



Crown Street Plot D, Manchester
Flood Sequential Test

August 2025

Contents

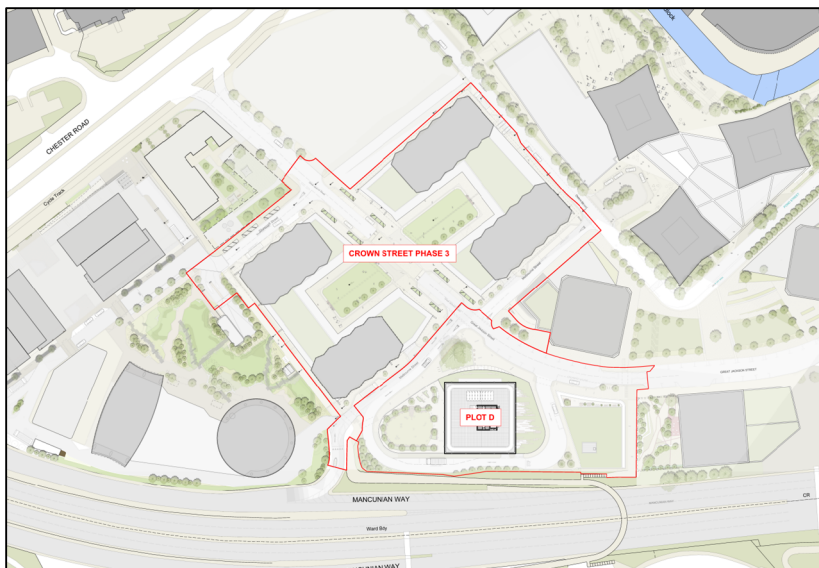
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1. Introduction

Introduction

- 1.1. This Flooding Sequential Test (the “Report”) has been prepared by Deloitte LLP on behalf of Renaker Build Limited (the “Applicant”).
- 1.2. This Sequential Test accompanies an application for planning permission (Ref: 137227/FO/2023) for a site known as Crown Street Plot D. The application for planning permission relates to a mixed-use development consisting of residential development (Use Class C3) alongside flexible commercial, leisure, food and drink uses (all Use Class E) and / or drinking establishment (Sui Generis), an office building (Use Class E), basement parking, public realm improvement, and other associated works (the “Proposed Development”).
- 1.3. The description of the Proposed Development as detailed on Public Access is:
“Full planning permission for the demolition of existing structures and the erection of one residential building to a height of 71 storeys comprising 642 homes (Use Class C3) with food and drink uses (Use Class E) and / or drinking establishment (Sui Generis); and one office building (Use Class E); with basement car parking, cycle parking, landscaping and public realm, servicing and access arrangements, highways alterations and associated works.”
- 1.4. This Report has been prepared in response to the risk of surface water flooding within the Site of the Proposed Development. It considers the application of the Sequential Test and subsequently the Exception Test set out in the National Planning Policy Framework (‘NPPF’) and Planning Practice Guidance (‘PPG’).
- 1.5. Please refer to Figure 1 below for the Site Location Plan (Ref: 10419-Z1-SHO-G000-PL-XX-B5D821-P01) of the Proposed Development (area marked up as “Plot D”).

Figure 1 Site Location Plan



The Application Site

- 1.6. The Site measures approximately 0.661ha and is bounded by Great Jackson Street, Melbourne Street and the Mancunian Way Ring Road.

- 1.7. As a site located within Manchester City Centre and the Regional Centre, the Site has been underutilised. It currently comprises a concrete batching area, associated with the surrounding residential development within the Great Jackson Street area.
- 1.8. The vision of the Great Jackson Street Development Framework (the “Framework”) for the area (the “Framework Area”) has remained consistent since the 2015 endorsed version of the Framework to “create a vibrant, safe, secure and sustainable community”¹. The Framework envisions that Great Jackson Street will be characterised by high rise residential development.
- 1.9. The area immediately surrounding the Site is characterised by new residential developments, including Deansgate Square, Crown Street Phase 1, Crown Street Phase 2, and Plot F Great Jackson Street.

Environment Agency Designation

- 1.10. A Flood Risk Assessment and Drainage Strategy (the “FRA”) (Prepared by Curtins, Dated March 2023) has been submitted in support of the full planning application (Ref: 137227/FO/2023). An FRA Addendum (August 2025) has also been submitted, which considers the most recent updates to the Environment Agency flood data.
- 1.11. As noted in the submitted FRA and FRA Addendum and the NPPF, the Sequential Test aims to steer developments to areas with the lowest risk of flooding from any source.
- 1.12. Since the FRA was originally produced in March 2023, the Environment Agency has released updated flood risk data and maps. Figures 2 and 3 set out the latest fluvial flood risk and the surface water flood risk respectively. This new data has therefore been reviewed to ensure the conclusions from the FRA are still valid, as contained within the FRA Addendum (August 2025).

Figure 2 Flood Map (Fluvial Flooding)



¹ The Great Jackson Street Development Framework was originally endorsed in 2015, and subsequently refreshed in 2018.

Figure 3 Flood Map (Surface Water)



- 1.13. Within this context, the Site is still located within Flood Zone 1 therefore the fluvial flood risk conclusions of the original FRA remain valid.
- 1.14. Regarding the risk of flooding from surface water, the updated EA data indicates that there are pockets of areas within the Site that are susceptible to surface water flooding, with its annual exceedance probability being 0.1% (1 in 1,000) chance of flooding each year.
- 1.15. It is noted that the majority of the Site is considered at 'very low' risk of surface water flooding, with minor occurrence of surface water flooding on roads i.e. Melbourne Street bordering the Site which will be confined to the roads where levels are lower. There is one localised area of potential surface water flooding within the Site at 'medium' risk.
- 1.16. Overall, when the post-development context is considered i.e. drainage system in place, the FRA and the FRA Addendum confirms that the Site is at 'low' risk of surface water flooding.
- 1.17. Potential surface water flooding within the Site boundary requires the submission of a Sequential Test in accordance with Paragraph 174 of the National Planning Policy Framework (2024).

2. Planning Policy Context

National Planning Policy Framework (NPPF) (2024)

- 2.1. Paragraphs 170-182 of the NPPF set out the approach for planning and flood risk.
- 2.2. Paragraph 173 of the NPPF states that a sequential risk-based 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 (Paragraph: 004 Reference ID: 7-004-20220825).
- 2.7. The advice in respect of the application of the Sequential Test is set out within the section of the PPG entitled “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 adopted Development Plan for the Site comprises the following:
- Greater Manchester Combined Authority Places for Everyone Plan (2024)
 - Greater Manchester Joint Waste Development Plan (2012)
 - Greater Manchester Joint Minerals Plan (2013)
 - Manchester Core Strategy (2012) and Addendum to Manchester Core Strategy (2024)
 - Saved Policies of the Unitary Development Plan (1995)
- 2.11. The Great Jackson Street Development Framework 2018 (the “Framework”) also forms a material consideration to the Proposed Development.
- 2.12. The Core Strategy Policy EN14 ‘Flood Risk’ states 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).”*
- 2.13. It should be noted that the Site was not considered by the SFRA.
- 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. PPS25 has been replaced by the NPPF and the PPG.
- 2.16. In addition to the above local policy, the Places for Everyone Plan Policy JP-S4 ‘Flood Risk and the Water Environment’ requires all development proposals to work with natural processes and adopt a natural flood management approach, and to locate and design development so as to minimise the impacts of current and future flood risk.

3. Methodology for the Sequential Test

Introduction

- 3.1. The adopted methodology for the Sequential Test for the Proposed Development 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 (in summary) three key elements to be considered, namely:
 - The geographical area across which the test is applied;
 - The range of alternative sites to be considered; and
 - Whether the alternative site(s) is 'reasonably available'.

Geographical Area

- 3.3. A "region-wide" 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 region (e.g. high-density urban centre development would not be considered appropriate within suburban and rural areas).
- 3.4. The endorsed Framework vision identifies an ambition for this area of Manchester City Centre to be the *"residential-led neighbourhood of choice"* and emphasises the opportunity to introduce high density developments of heights given the Framework Area's gateway location. The Framework also recognises the opportunity to encourage residential development that creates a significant amount of public space / active frontages.
- 3.5. As part of the overarching vision of the Framework, the Framework Area (covering the Site) is earmarked to be turned into a residential-led community.
- 3.6. The Site also falls under the Manchester City Centre boundary which is expected to see the most intensive form of development of housing in the City.
- 3.7. The application of this Sequential Test for the Proposed Development therefore considers development sites within the Manchester City Centre boundary area. For the sake of completeness, there are also specific areas on the outskirts of the City Centre (covered by respective Strategic Regeneration Framework e.g. Victoria North and Strangeways) which were identified to be suitable for high density residential developments and, therefore, they are also included within the geographical search area of this Sequential Test for the Proposed Development.
- 3.8. It is considered that this geographical search area is appropriate for this search given the form of the Proposed Development, which is a tall building and dense residential development, comprising flats, which would not be considered suitable further out of the City Centre and its periphery. This is together with consideration of the importance of having mixed-use schemes in the wider City Centre regeneration strategy, 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 search area (i.e. Manchester City Centre and its periphery) potential alternative sites need to be identified and assessed for their availability.

- 3.10. It is proposed that a +/- 20% buffer is applied to the capacity of the development to create a range within which potential alternative sites can be identified and allow an assessment of similar sites that could deliver a similar amount of housing.
- 3.11. The Proposed Development (under planning application ref. 137227/FO/2023), indicates the number of homes to be delivered on the Site is 642no. units, which generates a range of comparison sites between 513no. and 770no. units.
- 3.12. The 20% comparator is only applied to the residential element of the Proposed Development, with the minor flexible commercial floorspace and the commercial building 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 separately assessed for flood risk purposes 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 relevant requirements of the NPPF and PPG, 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 being Flood Zone 1 that are not impacted by any surface water flooding.
- 3.15. A Council will typically accept that a Sites 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. In these instances, it is presumably very unlikely that the developer in question would make parts of an implemented site available for development by others.
- 3.17. Evidence that a planning permission is likely to be implemented can include (as the case may be):
- 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 reserved matters applications.
- 3.18. Paragraph 7-028-20220825 of 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

- 3.19. Following the above methodology, the findings of the Sequential Test assessment are outlined in the following section.
- 3.20. This is followed by an overview of the requirement for the Exception Test, which is not considered applicable in this instance.
- 3.21. The sources for identifying potential alternative sites are as follows²:
- Manchester City Council Strategic Housing Land Availability Assessment 2024;
 - Manchester City Council Planning Portal database; and,

² There are no Local Plan Site Allocations under the Manchester City Council Local Development Plan.

- Open Market Sites: Estates Gazette, Right Move, On the Market and Zoopla.

4. Flood Risk Sequential Test Assessment

- 4.1. As outlined in Chapter 3 – Methodology above, in order for development proposals to satisfy 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 any surface water flooding).
- 4.2. In the present case, this reduces the geographical area for potential alternative sites given there are substantial areas of localised surface water flooding spread across Manchester City Centre and its periphery.

Site Sifting

- 4.3. The first step is to review the sources of information outlined above to establish the extent of sites within the City Centre (and its periphery) that are within the potential alternative site range parameter of 513no. and 770no. units.

Manchester City Council Strategic Housing Land Availability Assessment (SHLAA) 2024

- 4.4. All sites with planning permission are included within the Manchester City Council Five-year Housing Land Supply Statement – Annex, as of 1st April 2024.
- 4.5. Following a review of the SHLAA, there is 7no. alternative sites that fall within the specified site range parameters namely:
- Great Northern Complex (Ref: Dean2100).
 - Lower Medlock (Ref: Brad_Cap_141).
 - Piccadilly Tower, Ducie Street (Ref: CC_Cap_1001).
 - Weston Hall and Pendulum Hotel, Sackville Street (STUDENT) (Ref: Picc2403).
 - North Manchester General Hospital (Ref: Crum2100).
 - Wythenshawe Civic Centre: Shell site (Ref: Wood2301).
 - Victoria Point 44 Hathersage Road (STUDENT) (Ref: Ardw2401).
- 4.6. The 7no. alternative sites identified are discounted for further consideration based on the following reasons:
- Great Northern Complex (Ref: Dean2100) – Presence of localised areas of surface water flooding risk.
 - Lower Medlock (Ref: Brad_Cap_141) – Substantial areas of the site situated within Flood Zone 2 and Flood Zone 3, together with localised areas of surface water flooding risk
 - Piccadilly Tower, Ducie Street (Ref: CC_Cap_1001) – The site is earmarked for mixed-use development under the Manchester Piccadilly Strategic Regeneration Framework (2018) however the site is discounted due to large proportion of the site under risk of surface water flooding.
 - Weston Hall and Pendulum Hotel, Sackville Street (STUDENT) (Ref: Picc2403) – A large proportion of the site falls under Flood Zone 2, and it is also impacted by surface water flooding. The site is also discounted on the assumption that it is earmarked for purpose built student accommodation (PBSA) use.

- North Manchester General Hospital (Ref: Crum2100) – Presence of localised areas of surface water flooding risk.
- Wythenshawe Civic Centre: Shell site (Ref: Wood2301) – the area falls under Wythenshawe Town Centre Development Framework (2022) and was earmarked to create a new neighbourhood. However, the site is discounted due to presence of localised areas of surface water flooding risk.
- Victoria Point 44 Hathersage Road (STUDENT) (Ref: Ardw2401) – Presence of localised areas of surface water flooding risk. The site is also discounted on the assumption that it is earmarked for purpose built student accommodation (PBSA) use.

4.7. As a result, the 7no. alternative sites are all discounted for further consideration as they are all affected by fluvial / surface water flooding to a similar / higher degree than the Site of the Proposed Development.

Planning Application Database

- 4.8. The Five-year Housing Land Supply Statement – Annex covers the period up to April 2024 and so a review of the online planning application database was carried out to ensure no further ‘Major Dwellings’ extant planning permissions were missed in the subsequent period.
- 5.1. This covered the period from 1st January 2024 to 22nd July 2025, for sites within the Deansgate Ward, Piccadilly Ward, Ancoats and Beswick Ward, and Hulme Ward, and included a search for all planning applications that had been granted planning permission.
- 5.2. 1no. planning permission was listed within Deansgate Ward, no planning permission was listed within Piccadilly Ward, 2no. planning permissions were listed within Ancoats and Beswick Ward, and 1no. planning permission was listed within Hulme Ward. However, none of these are within the identified parameters and/or geographical area boundaries.

Sites for Sale

- 5.3. A search of the Estates Gazette Property was undertaken on 22nd July 2025 to review and establish if there were any alternative sites available on the market within Manchester City Centre and its periphery.
- 4.9. A search field of 5 miles from Manchester was entered for sites that were listed as ‘for sale’ or ‘at auction’ and all property types, tenure and price were considered.
- 4.10. To identify compatible sites to the Site (at 0.661ha), sites within a 25% parameter of the size of the Site (between 0.49575ha to 0.82625ha) were considered.
- 4.11. No alternative sites within 5 miles from Manchester were identified from Estates Gazette Property.
- 4.12. Searches were also taken on other comparable sites, including Rightmove, On the Market and Zoopla; which also identified no further sites as being available.

Assessed Alternative Sites

- 4.13. As identified above, we have utilised a multi-method approach to identify any reasonably available alternative sites in accordance with the NPPF and PPG.
- 4.14. We have identified no appropriate sites and have not been informed of any alternative sites by Manchester City Council.

Disaggregation

- 4.15. 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.”

- 4.16. 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)

- 4.17. In this regard, the case of Mead Realisations Ltd v The Secretary of State for Levelling Up, Housing And Communities & Anor [2024] EWHC 279 (Admin) (12 February 2024) (‘Mead’) is an important judgment on the interpretation and application of the Flood Risk Sequential Test in national policy. Paragraph 110 of the judgment 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.”

- 4.18. The Mead judgement confirms that whilst it is possible to consider smaller sites, there must be some connection between them and that the smaller sites should not be disconnected or not connected to one another.

- 4.19. When considering the potential for parts of larger sites to be counted as ‘reasonably available’ paragraph 109 of the Mead judgment 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.”

- 4.20. 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 and its periphery. 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”*.

- 4.21. We therefore conclude that most larger sites are unlikely to be reasonably available to the Applicant at the point in time envisaged for the proposed development. The Applicant has ambitions to commence construction and therefore the development within a short timeframe in order to meet funding and grant deadlines, upon receipt of Planning Permission. The Applicant has a proven tracked record in delivering similar development proposals within the Great Jackson Street area and wider afield in Manchester City Centre. Upon receipt of any Decision Notice, the Applicant is intending to start on Site as soon as possible and build out the Proposed Development in accordance with the overall timescales outlined in the indicative delivery programme in the Environmental Statement.

Review of Smaller Sites

- 4.22. Applying the Mead judgment to the present case and following a review of the latest SHLAA, we do not consider there to be a series of smaller sites that have any indication of any connection or relationship that in combination could be considered to amount to a reasonable alternative site.

Review of Larger Sites

- 4.23. With regard to the larger sites, there are no sites within the SHLAA that are located in the City Centre and its periphery and could merit further consideration as to whether part of the site could reasonably form an alternative site.
- 4.24. There are no sites included within the SHLAA (within Manchester City Centre and its periphery) that can deliver the same / greater number of homes than the Site under the Proposed Development, at more than 70-storey height delivering 642no. units, which has lower risk of flooding (Flood Zone 1 where not impacted by any surface water flooding).

Summary

- 4.25. As set out within the above analysis, this Report has established that there are no sequentially preferable sites in the Manchester City Centre boundary and its periphery that could accommodate the proposed development in areas with a lower risk of flooding and are reasonably available in accordance with the relevant provisions of the NPPF and PPG.
- 4.26. As such, it is considered that the Flood Risk Sequential Test for the Proposed Development is satisfied.

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 dwelling houses” as “More 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 located within Flood Zone 1 with localised areas of surface water flooding within the Site, therefore the Site has been assessed throughout within the context of Flood Zone 1.

5.5. In accordance with the NPPF identifying proposed dwellings uses as “More 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 Renaker Build Ltd and is submitted in support of planning application Ref. 137227/FO/2023, which received resolution to grant at Manchester City Council Planning Committee in August 2024.
- 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. Further consideration has been given to specific areas on the outskirts of the City Centre (covered by respective Strategic Regeneration Framework e.g. Victoria North and Strangeways) which were identified to be suitable for high density residential developments.
- 6.4. The Sequential Test in this report has considered the current Manchester City Council Five Year Housing Land Supply Statement (2024), SHLAA, extant planning permissions, sites for sale on the open market and has identified no reasonably available sites appropriate for the proposed development in areas with a lower risk of surface water flooding.
- 6.5. There is no need to undertake the Exception Test for this Site.



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