AshtonHale

Sequential Test for Flood Risk Assessment

232-236 Palatine Road, Didsbury

1.1 This note has been prepared on behalf of Marco Living in relation to the proposed redevelopment of 232-236 Palatine Road, Didsbury ("the Site") for residential use. It considers alternative sites for the development in the context of the flood risk and sequential approach set out in planning policy.

1.2 The site is currently occupied by 3 detached houses which have been converted and extended to accommodate 22 separate apartments in total. It is proposed to demolish the existing buildings and create a new build apartment block containing 54 no. apartments, and a mixture of 16 townhouses/ semi-detached houses.

Planning Policy Context

1.3 Paragraph 173 of the National Planning Policy Framework states:

> *When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:*
>
> *a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;*
> *b) the development is appropriately flood resistant and resilient such that, in the event of a flood, it could be quickly brought back into use without significant refurbishment;*
> *c) it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;*
> *d) any residual risk can be safely managed; and*
> *e) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.*

1.4 The site is within Flood Zone 3 and therefore a site-specific Flood Risk Assessment is required to support the planning application. This document has been prepared to address the sequential test element.

1.5 Paragraph 168 of the NPPF 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. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.*

1.6 Paragraph 169 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. The strategic flood risk assessment will provide the basis for applying this test. The sequential approach should be used in areas known to be at risk now or in the future from any form of flooding.*

1.7 Planning Practice Guidance 'The sequential approach to the location of development' provides further guidance on the matter. It states:

> *"Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:*
>
> - *Within medium risk areas; and*
> - *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas.* [1]

1.8 With reference to who has responsibility for deciding whether the Sequential Test is passed, it states:

> *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.*

[1] Paragraph: 024 Reference ID: 7-024-20220825

1.9 PPG defines 'reasonably available sites'[2] as *"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'."*

1.10 The remainder of this document undertakes the exercise in line with the methodology described above.

Area of Search

1.11 It has been agreed with Manchester City Council that the appropriate search area for other suitable alternative sites for the development proposed on the Site would be the West Didsbury Ward. This has also previously been agreed with the Environment Agency. The Ward Boundary is indicated on the attached Plan (Appendix I).

Reasonably Available Sites Allocated in Adopted Development Plans

1.12 The Proposals Map at Appendix II shows allocations in Places for Everyone (adopted 2024), the Core Strategy (adopted 2012) and any saved from the Unitary Development Plan (UDP).

1.13 It can be seen that no 'New Housing' sites are located within the West Didsbury ward. As such, it can be concluded there are no reasonably available sites identified in Adopted Development Plans.

Reasonably Available Sites Identified in Land Availability Assessments

1.14 The most recent Strategic Housing Land Availability Assessment was published in 2024. A map of the identified sites within the West Didsbury Ward is shown at Appendix III, outlined in light blue.

1.15 Out of the 18 sites:

- 2 are 'under construction', and are therefore not reasonably available
- 1 is a 'capacity site', i.e. does not have planning permission but could have the potential to be developed for housing
- 15 have planning permission for residential development

1.16 The 16 sites that could be reasonably available are set out below with their assessed capacity.

[2] Paragraph: 028 Reference ID: 7-028-20220825

1) 758A Wilmslow Road M20 2DW – 3 dwellings
2) 246 Palatine Road M20 2WF – 1 dwelling
3) Jessiefield, Spath Road M20 2TZ – 26 dwellings
4) 123 Barlow Moor Road M20 2TS – 4 dwellings
5) 129 Barlow Moor Road M20 2AJ – 1 dwelling
6) 174 Palatine Road – 6 dwellings
7) Flat 7 1 Moorfield Road M20 2UZ – 1 dwelling
8) 286 Burton Road – 1 dwelling
9) 78 Clyde Road – 1 dwelling
10) 21 Old Lansdowne Road – 1 dwelling
11) The Rossett 123 Palatine Road M20 3YA – 1 dwelling
12) Didsbury Point – 76 dwellings
13) Land To The South Of Cavendish Road – 2 dwellings
14) 628 Wilmslow Road, M20 3QX – 1 dwelling
15) Ground floor 574 Wilmslow Road – 1 dwelling
16) 95 Palatine Road – 24 dwellings (capacity site)

1.17 It is clear from the above that there are no reasonably available sites in the West Didsbury Ward that could accommodate the proposed 70 dwellings. If the proposals were split into the apartments and townhouses (i.e. to allow it to be across multiple sites), there is no one site that could accommodate the entirety of the apartment block. As such, it can be concluded there are no reasonably available sites identified in Land Availability Assessments.

Assessment of Need and Demand

1.18 The Places for Everyone Plan, adopted in March 2024, provides the following commentary on the housing market in South Manchester:

"4.60 The southern areas of Greater Manchester are typically characterised by high levels of demand and forecast growth and include some of the city region's most popular neighbourhoods. Large parts of the south, extending into north Cheshire, have high house prices and relatively high household incomes, but also significant issues of affordability."

1.19 In summary, property in South Manchester is highly sought after and the market is very competitive. It is clear from the above exercise that there are very limited sites available for major residential development in the West Didsbury Ward. A major development of the scale proposed will increase the housing stock in the area, diversify the offer, and help address affordability issues by increasing supply.

1.20 The Manchester Housing Need Assessment 2023 is the most up to date study prepared by Manchester City Council to address housing need and demand.

1.21 The below table identifies the need in South Manchester by number of bedrooms:

Table ES4 Summary of overall dwelling mix by tenure : South Manchester

Number of bedrooms	Tenure			
	Market	Social/ Affordable Rented	Affordable Home Ownership	Total
1	2-5%	20-25%	5-10%	5-10%
2	30-35%	50-55%	45-50%	35-40%
3	45-50%	20-25%	40-45%	40-45%
4 or more	15-20%	2-5%	0-2%	10-15%
Overall need for level-access dwellings	10-15%	25-30%	15-20%	15-20%

1.22 This identifies a particular need for 2 and 3-bedroom dwellings, which collectively account for 43% of the proposed scheme. 1 and 4 bed properties are also proposed, accounting for 34% and 23% respectively. As such, it can be concluded that the proposed development on this site would address the dwelling mix identified as in need in South Manchester.

Conclusion

1.23 The above analysis has demonstrated that there are no suitable or available sites in the defined search area of the West Didsbury Ward to accommodate the proposed development either together or in their distinct parts.

1.24 This is a site already used for residential development, and which is immediately adjacent to a block of apartments which are occupied at ground-floor level.

1.25 The proposed development addresses the high demand and identified need in terms of dwelling mix in the South Manchester area.

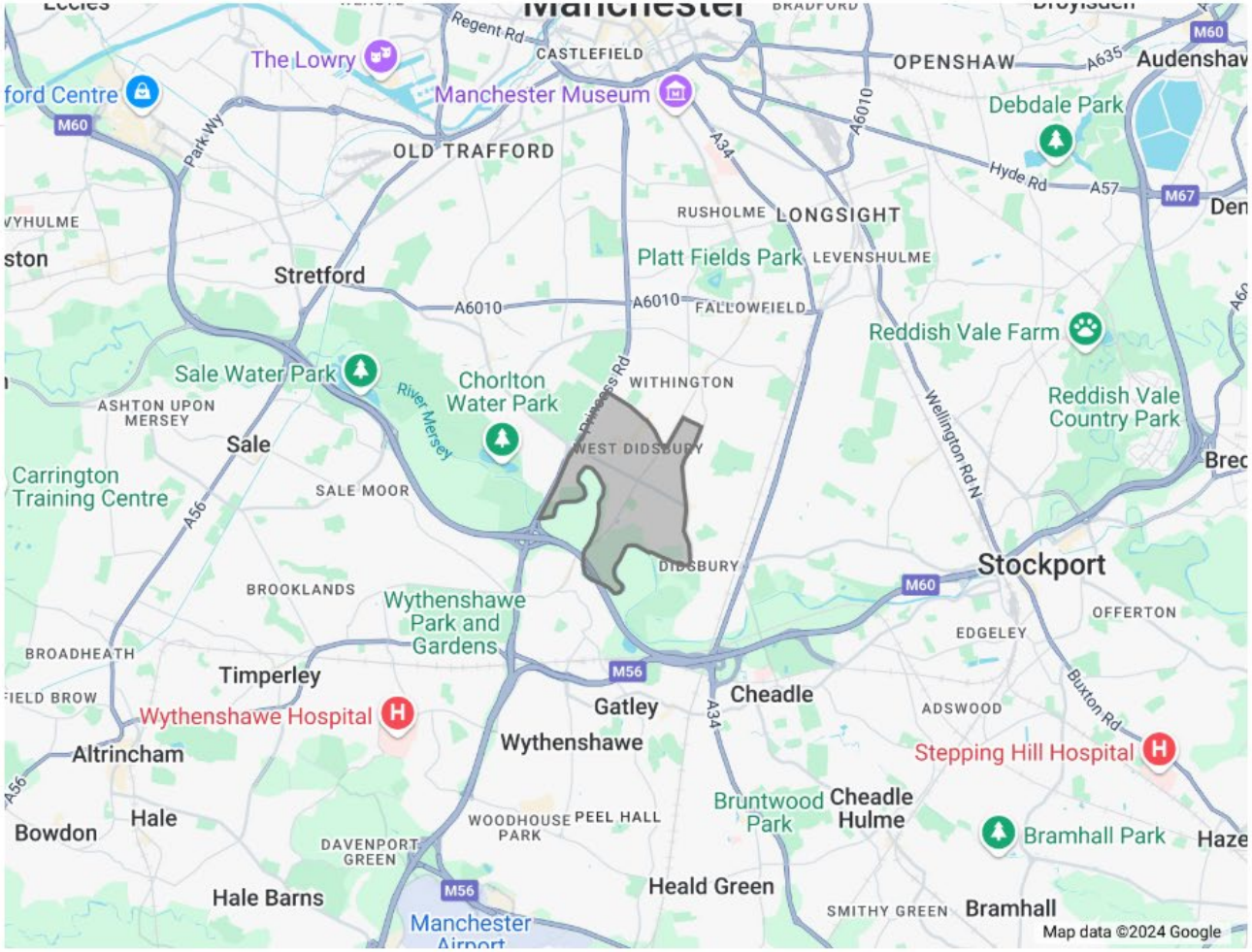
1.26 In the event of planning permission not being granted to redevelop the site, it will remain in its current state and an opportunity to improve the quality of the accommodation, the visual amenities of the area and the flood protection measures on site will be lost.

Appendix I – Ward Map – West Didsbury

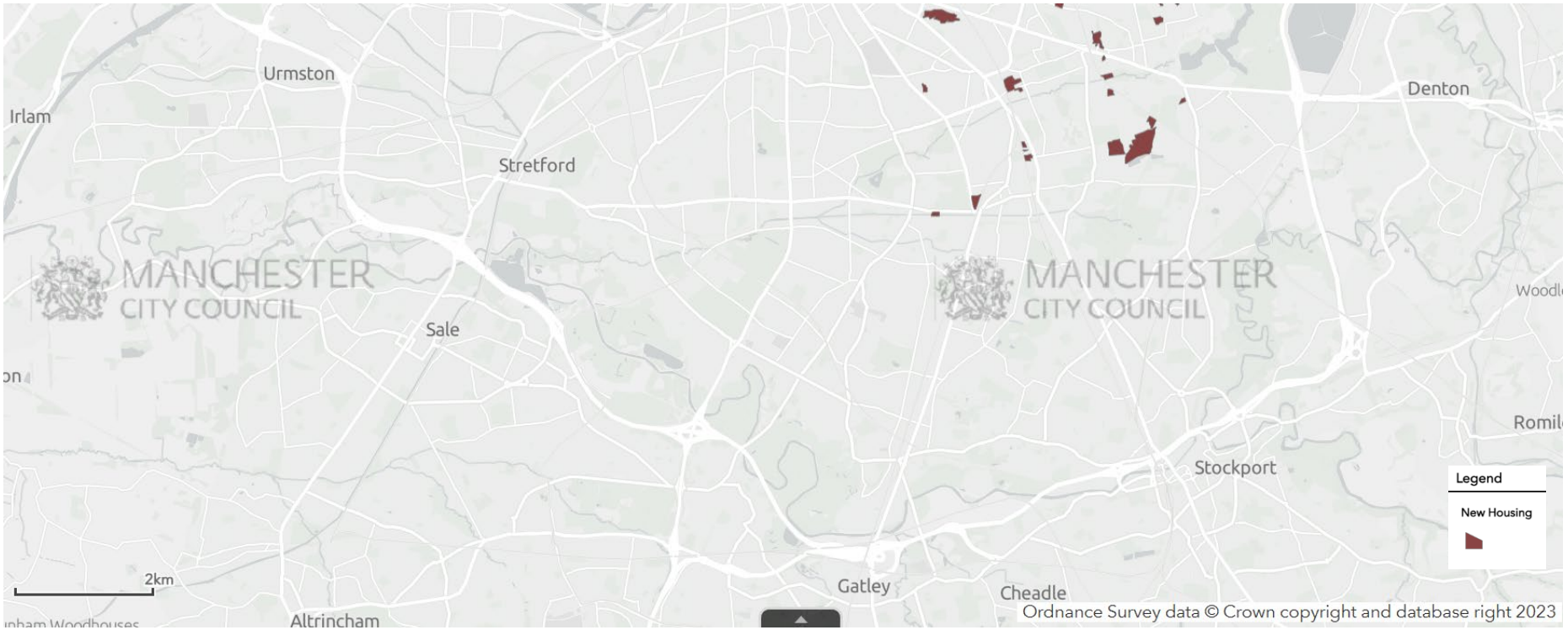
Didsbury West

Didsbury West ward

Didsbury West ward



Appendix II – Proposals Map Extract


Urmston
Irlam
Stretford
Sale
MANCHESTER
CITY COUNCIL
MANCHESTER
CITY COUNCIL
Denton
Stockport
Gatley
Cheadle
Altrincham
2km
Legend
New Housing
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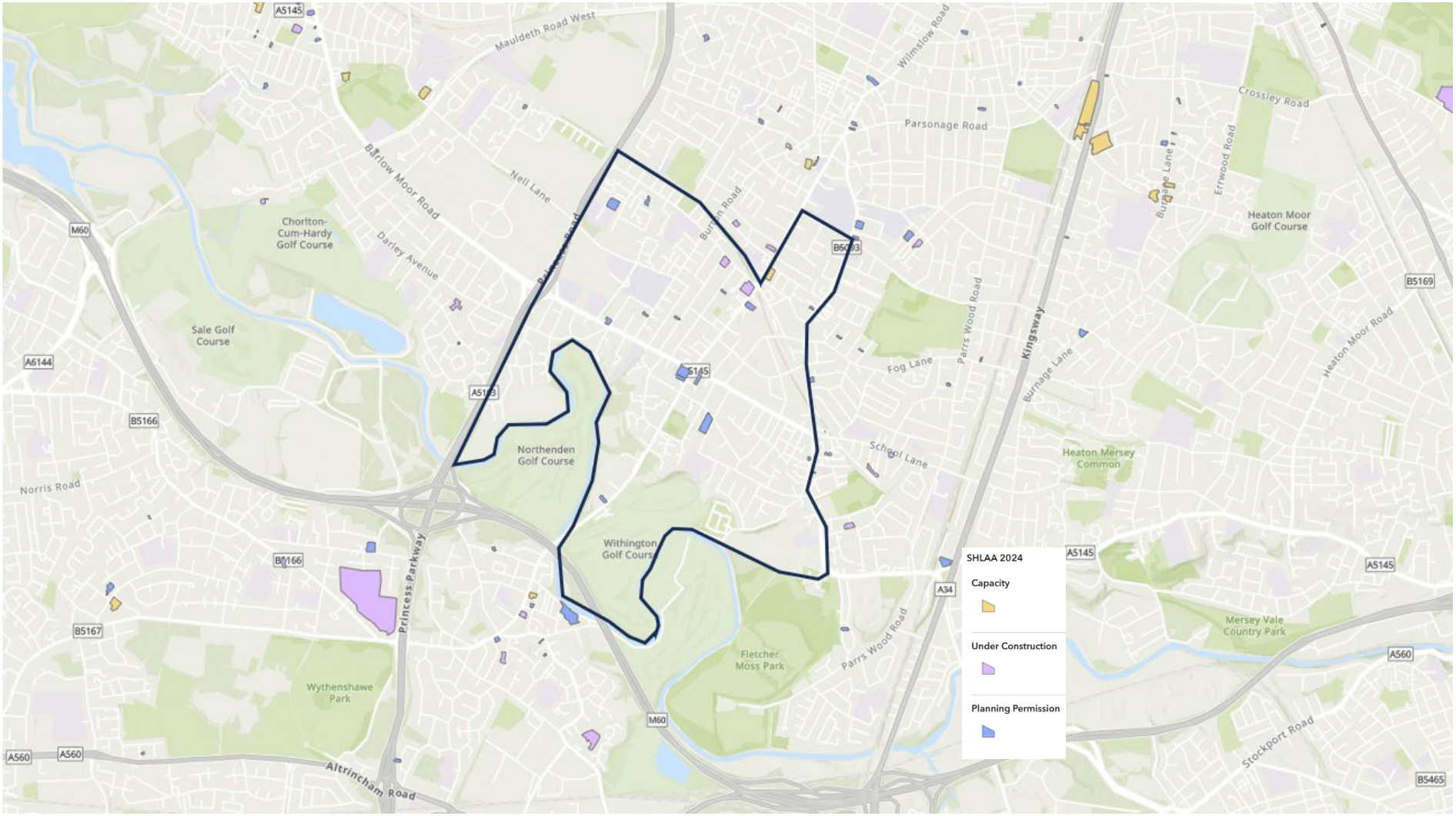
Appendix III – SHLAA Map Extract


A5145
Mauldeth Road West
Wilmslow Road
Parsonage Road
Crossley Road
Errwood Road
Barlow Moor Road
Nell Lane
Burnage Lane
Heaton Moor Golf Course
M60
Chorlton-Cum-Hardy Golf Course
Darley Avenue
Palatine Road
Burnage Road
B6093
B5169
Sale Golf Course
A6144
A5145
Fog Lane
Parrs Wood Road
Kingsway
Burnage Lane
Heaton Moor Road
B5166
Northenden Golf Course
School Lane
Heaton Mersey Common
Norris Road
Withington Golf Course
A5145
A5145
B5166
Princess Parkway
A34
B5167
Mersey Vale Country Park
Fletcher Moss Park
Parrs Wood Road
A560
Wythenshawe Park
M60
A560
A560
Altrincham Road
Stockport Road
B5465
SHLAA 2024
Capacity
Under Construction
Planning Permission