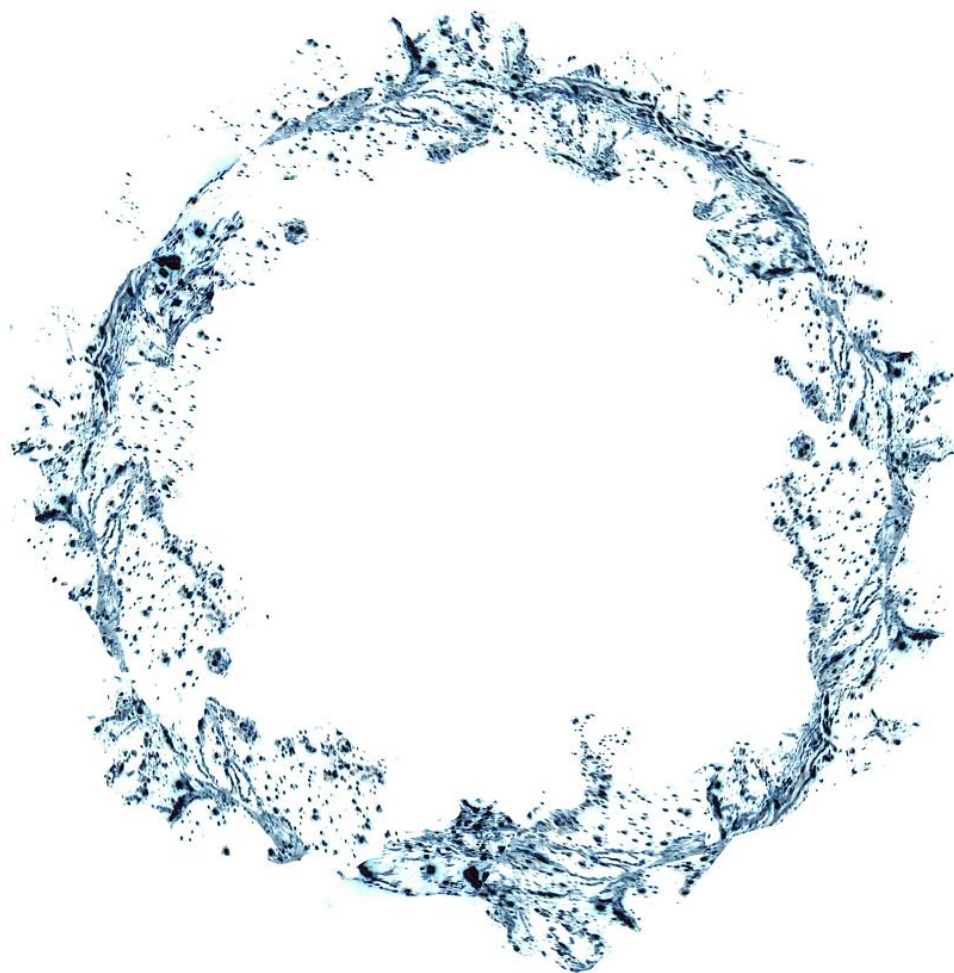




Bennet Street, West Gorton

Sequential Test

January 2023

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1. Introduction

- 1.1. This Sequential Test is submitted on behalf of Kellen Homes Ltd ('the Applicant') and accompanies the Full Planning Application for a residential-led scheme on the land at Bennett Street in West Gorton (the 'Site').
- 1.2. A planning application was submitted to Manchester City Council in July 2022, which seeks:
- "Full planning permission for demolition of existing buildings and structures on the site and erection of 272 homes (Use Class C3) and a new community building (Use Class F2(b)), with associated car parking, access, highways, landscaping and new public realm creation, and other associated works."***
- 1.3. In summary, the Proposed Development includes the following:
- Demolition of existing buildings on Site and full remediation;
 - Up to 272 residential homes (Use Class C3), providing a mix of 2 bed apartments and 2 bed, 3 bed and 4 bed houses;
 - A Community Hub building, comprising 862 sq ft floorspace (Use Class F2(b));
 - 2,882 sqm of green infrastructure / public realm, including the planting of 187 trees;
 - 100% secure cycle parking / storage for residents in rear gardens or garages.
- 1.4. This report has been prepared in line with the key requirements and policy considerations set out above. It follows the Government Guidance for "Flood risk assessment: the sequential test for applicants" (Available at: [Flood risk assessment: the sequential test for applicants - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/flood-risk-assessment-the-sequential-test-for-applicants)).

The Site

- 1.5. The Site is situated within West Gorton which is southeast of the city centre. It extends to 5.17 hectares and is currently occupied by a freight depot and for the storage of inert waste materials. At its southern boundary, adjacent to Bennett Street, the Site comprises a building used as office space and for storage by a container business while the centre and north of the Site largely comprises areas of hardstanding used for the open-air storage of shipping containers and scrap vehicles. The Site's topography is predominantly flat and no trees of significance are located on site.
- 1.6. The Site is bound to the north and west by a railway line and viaduct which leads directly to Ardwick Station and then Manchester Piccadilly Station to the north, to the east by low-rise residential development at Anthony Close and Hayfield Close and to the south by Bennett Street.
- 1.7. The south-western corner of the Site is occupied by a large, single-storey industrial building which originated as a parcel depot in the 1920s and was known as the Transport Permanent Way Depot (Manchester Corporation).



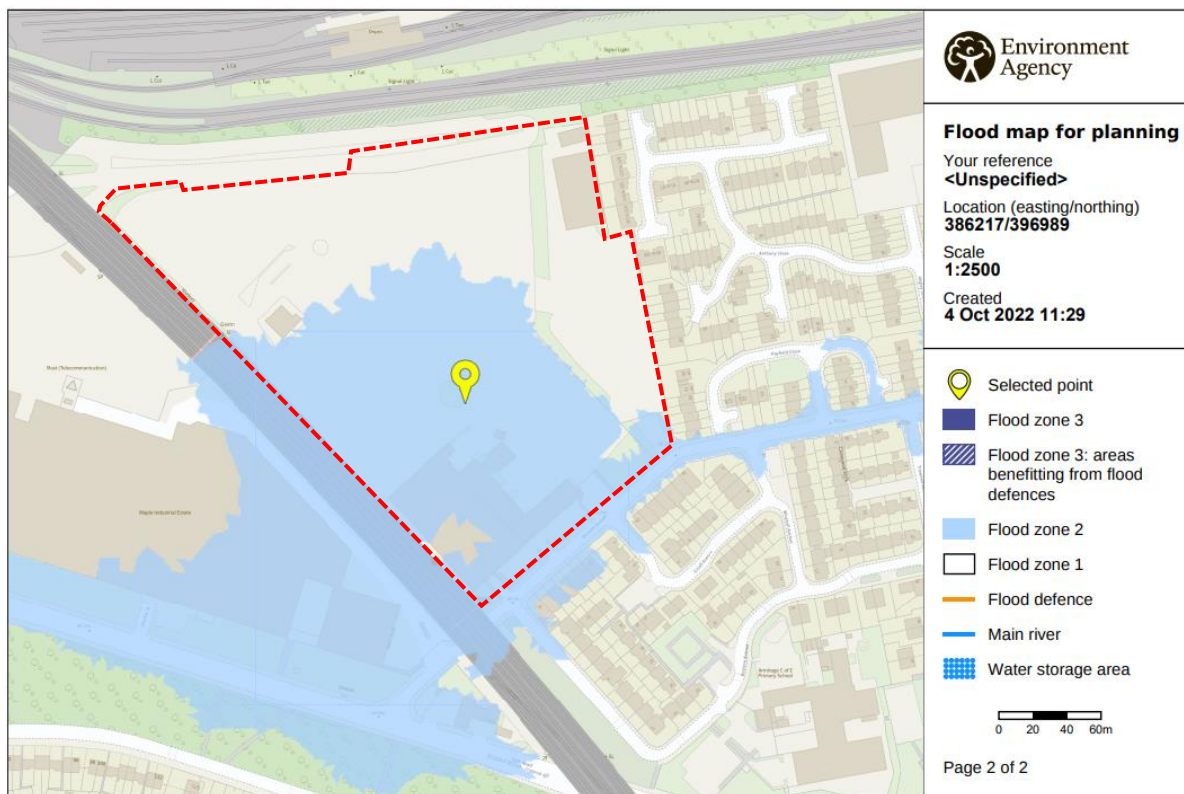
Figure 1 Aerial view of the Site in its current form

- 1.8. The Site is within close-proximity to several local services and amenities as detailed in Section 2 of the submitted Planning Statement. This includes schools, a medical centre, local businesses, and retail offering, as well as an existing residential community with recreational facilities.
- 1.9. An overview of the sustainable location of the Site is also provided in Section 2 of the Planning Statement, providing details of strong links to Manchester City Centre and subsequently other transport links further afield.

2. Reason required

- 2.1. Part of the Site falls within Flood Zone 2. The Sequential Test, as explained within Paragraph 161 of the National Planning Policy Framework (NPPF), aims to steer new developments to areas at the lowest risk of flooding and to ensure that the development type proposed is appropriate by reference to the flood risk.
- 2.2. Chapter 14 of the NPPF (2021) provides policy guidance on climate change, flooding, and coastal change. Paragraph 159 explains the basic principle that inappropriate development in the areas at risk of flooding should be avoided. This is achieved through applying a Sequential and Exception Test (when appropriate) as governed by Paragraphs 161-165.
- 2.3. Para. 161 of the NPPF states:

“All plans should apply a sequential, risk-based approach to the location of development – taking into account 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...applying the sequential test and then, if necessary, the exception test...”
- 2.4. Para. 153 states that plans should take a proactive approach to mitigating and adapting to climate change, taking account of the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures.
- 2.5. The northernmost part of Site is mainly located within Flood Zone 1 from river and sea sources, which means that there is less than 0.1% chance of flooding per annum. The southernmost part of the Site is located in Flood Zone 2, meaning that there is a medium probability of flooding in this area. The below plan illustrates the probability of flooding from rivers and seas



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Figure 2 Flood Zone within the site boundary (rivers and seas) Source: Environment Agency

2.6. The Site also has a low probability of flooding, with a few spots of medium probability, from surface water as illustrated below.

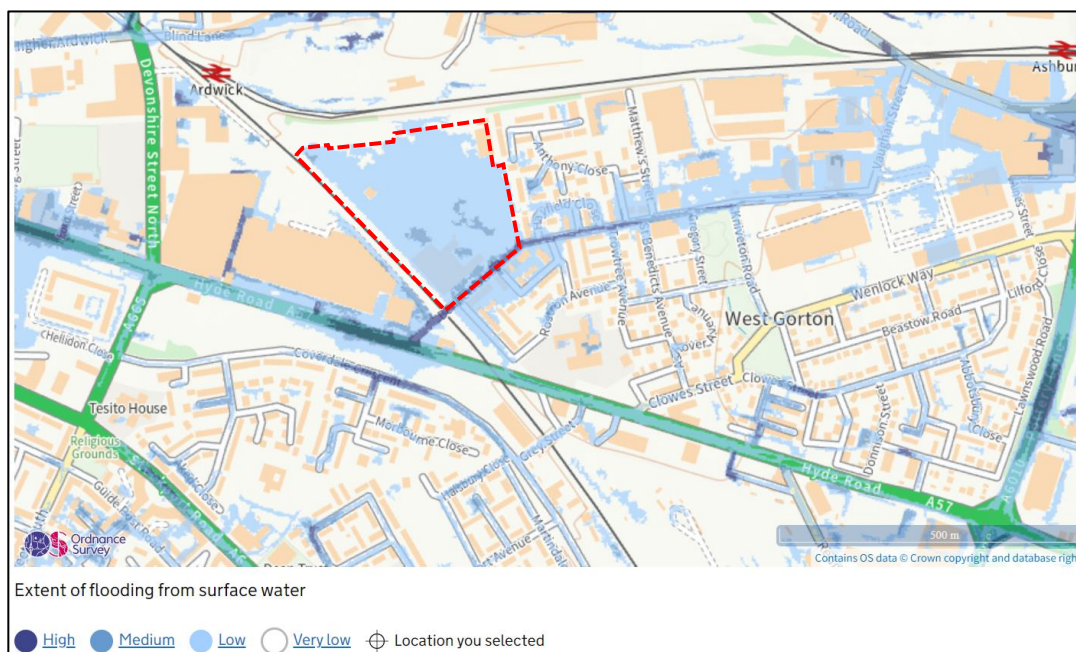


Figure 3 Flood Zone within the site boundary (surface water) Source: Environment Agency

3. Why the Site has been chosen for development

3.1. The Site is proposed for development as it is suitable and available, as evidenced in this section.

Manchester City Council Development Plan

3.2. The Site is located within Central Manchester, as defined by Policy EC8 and H5, as well as an Inner Area as defined by Policy SP1. Housing in Central Manchester, as defined by Policy H5, will accommodate around 14% of new residential development. Priority will be given to family housing and other high value, high quality development where this can be sustained. Between 2021-2027, there is an annual housing delivery target of 280 units and a total target of 1,680 units for this period.

3.3. Policy SP1 defines that development in Inner Areas of the City should make a positive contribution to neighbourhoods of choice including:

- Creating well designed places that enhance or create character;
- Making a positive contribution to the health;
- Safety and wellbeing of residents considering the needs of all members of the community regardless of age, gender, disability, sexuality, religion, culture, ethnicity or income;
- Protect and enhance the built and natural environment;
- Minimise emissions, ensure efficient use of natural resources and reuse previously developed land wherever possible; and
- Improve access to jobs, services, education and open space by being located to reduce the need to travel and provide good access to sustainable transport provision.

3.4. Policy H2 (Strategic Housing Location) states that:

“Housing proposals in the Strategic Housing Location, in particular in West Gorton, the Irk Valley, Holt Town and the Lower Medlock Valley, will need to take account of the flood risk issues in line with policy EN14 - Flood Risk”.

3.5. Policy EN14 (Flood Risk) of the Manchester City Council Core Strategy requires:

“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 and Trafford SFRA.”

Places for Everyone

- 3.6. As the Proposed Development is within a brownfield site, it is in line with the Places for Everyone Plan 'brownfield preference' policy, which is adopted in the Plan, which has sought to *"enable most efficient use of our brownfield land supply"* and *"maximise the supply of the brownfield land at the core of the conurbation and limit the need extent of Green Belt release"*.
- 3.7. Draft Policy JP-S 5 (Flood Risk and the Water Environment) of the Places for Everyone JDP (Publication/ Submission Plan) outlines that an integrated catchment-based approach will be taken to managing flood risk in a number of ways, including:
- "...locating and designing development so as to minimise the impacts of current and future flood risk; and expecting developments to manage surface water runoff through sustainable drainage systems and as close to source as possible..."*

Strategic Housing Land Availability Assessment (2022)

- 3.8. The site is included in the 2022 annual Strategic Housing Land Availability Assessment (SHLAA), which outlines that MCC considers the land suitable for residential development and expects it to delivered housing over the next 15 years or more.

Manchester City Council Brownfield Register (2022)

- 3.9. The site is identified in the Brownfield Register (2022) as having capacity for 370 homes (ref: Ardw1905). The purpose of the Brownfield Land register is to provide up-to-date and consistent information on sites that local authorities consider to be appropriate for residential development. For those reasons, it is clear that MCC considers the site appropriate for development.

Our Manchester Strategy: 2016-2025

- 3.10. Our Manchester Strategy: 2016-2025 sets out MCC's ambitions to support the growth of the city through providing a balanced housing market which caters to all residents, including through the delivery of higher value homes, and at the same time supporting Manchester residents to access decent housing that they can afford. In line with the Proposed Development the Strategy sets out aim to:
- "continue emphasis on directing new housing to brownfield land in urban locations, limiting the requirement for Green Belt development and enhancing the quality of life in our existing urban areas"*.
- 3.11. In addition, the Strategy sets out the aim to *"increase supply and density and the conurbation core on brownfield sites within the Northern and Eastern Gateways"*.

The Greater Manchester Strategy: Our People, Our Place (2017)

- 3.12. The proposals will also assist in delivering on the ambitions of The Greater Manchester Strategy: Our People, Our Place (2017) in providing high-quality housing nearby to employment locations in order to

support the city's growing population. The Strategy also highlights the preference on developing on brownfield land.

West Gorton Regeneration

3.13. In 2009, Manchester City Council's Executive Committee approved a masterplan for the regeneration of West Gorton which included the following elements:

- The refurbishment of existing council owned homes through the transfer of this stock to Guinness Northern Counties (GNC) Limited;
- The demolition of c. 400 existing obsolescent homes (including two tower blocks);
- The development of up to 1,000 new homes including the re-provision of social rented properties and new homes for sale;
- The development of a new Community Park and the delivery of a programme of environmental and public realm improvements;
- The development of a Community Hub providing a new replacement Medical Centre and new and replacement retail facilities; and
- The retention of the former Fujitsu Tower and R&D Building for employment uses.

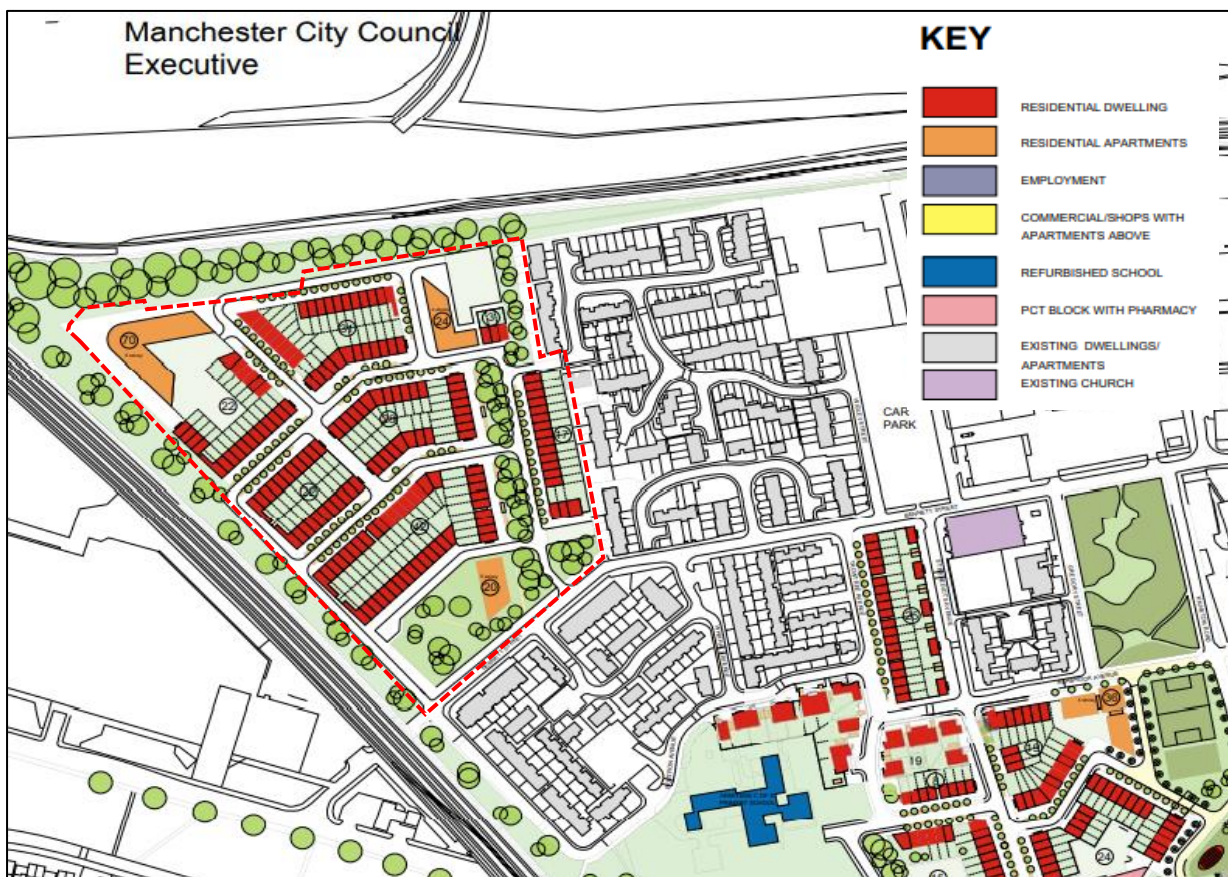


Figure 4 Indicative Masterplan for Regeneration, with the Proposed Development boundary overlaid in red dash

3.14. The site is therefore considered as suitable in the context of it being identified for housing within the SFRA 2011 (Ref: M0010), as well as the SHLAA 2022 (Ref: ARDW1905) and MCC Brownfield Register.

- 3.15. The applicant has prepared and submitted a detailed planning application for approval. The plans have been developed in line with flood risk and policy requirements, as detailed in the Planning Statement submitted with this application. Subject to planning permission being granted, Kellen Homes will be acquiring the site. The site is therefore considered available for the Proposed Development.
- 3.16. Finally, at a wider scale, the Manchester, Salford, and Trafford Strategic Flood Risk Assessment (SFRA) highlights the site is within an area suitable for housing as illustrated in **Figure 5**.

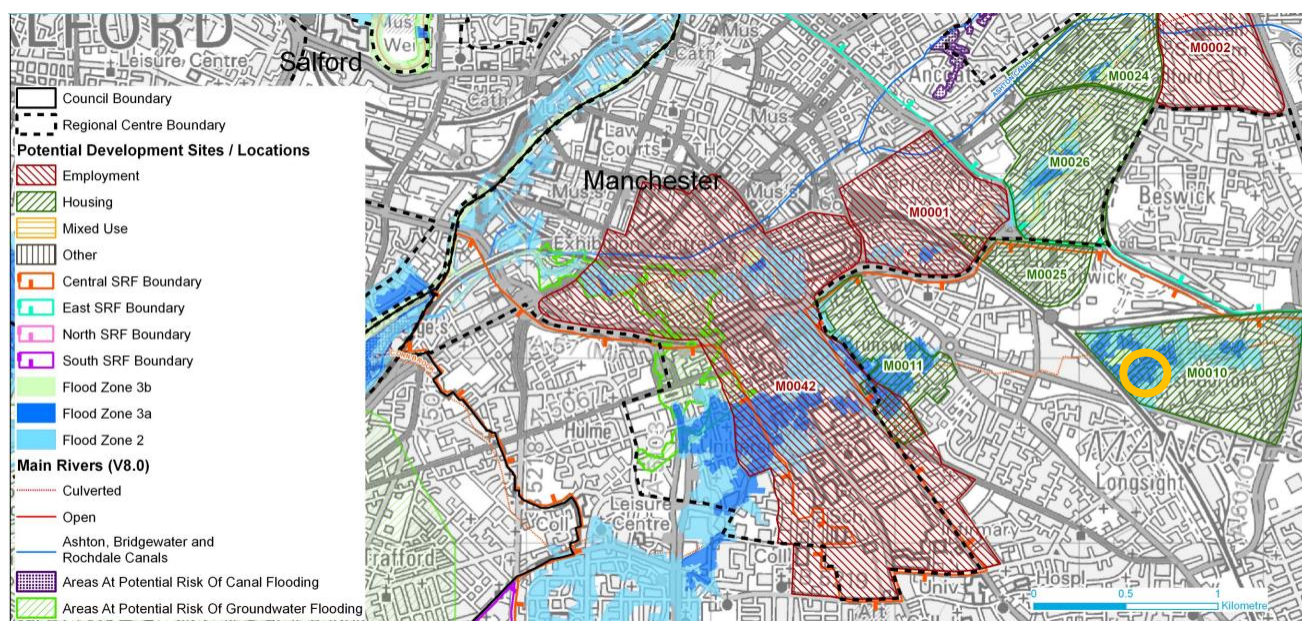


Figure 5 Site within the SFRA (area highlighted in orange)

- 3.17. Please note that the above map taken from the SFRA identifies the site as Flood Zone 2 and 3; however it is important to highlight that this is from 2011 and since then the area has been reclassified as Flood Zones 1 and 2 and shown by the Environment Agency (). The Environment Agency maps were accessed in October 2022. which is the most up to date information.

4. Sequential test site area and considerations

4.1. The area in red has been considered as the sequential test site area. This is agreed with the case officer.

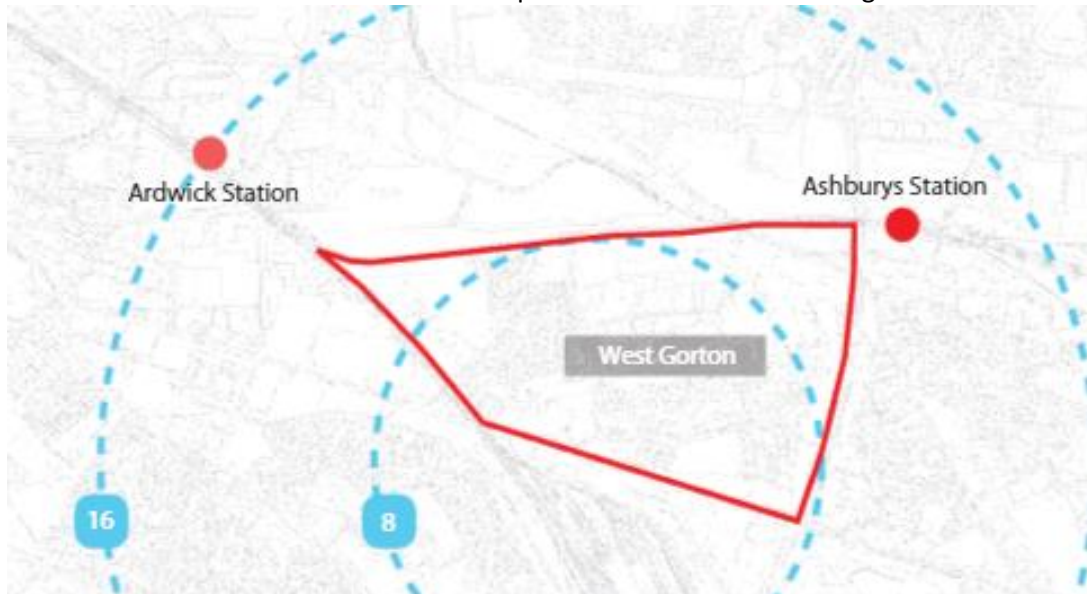


Figure 6 Area of sequential test outlined in red

Site Allocations

- 4.2. The Manchester City Council Strategic Housing Land Availability Assessment (SHLAA) identifies the Site as a Capacity Site (2022, Site Reference: Ardw1905) and within the Brownfield Register Sites (2020, Site Reference: Ardw1905). It is due to come forward in Year 1 – 5 and is identified as having capacity for 370 units.
- 4.3. As the site has already been identified as suitable for housing within the SHLAA; the principle of the proposed development is established and accepted.

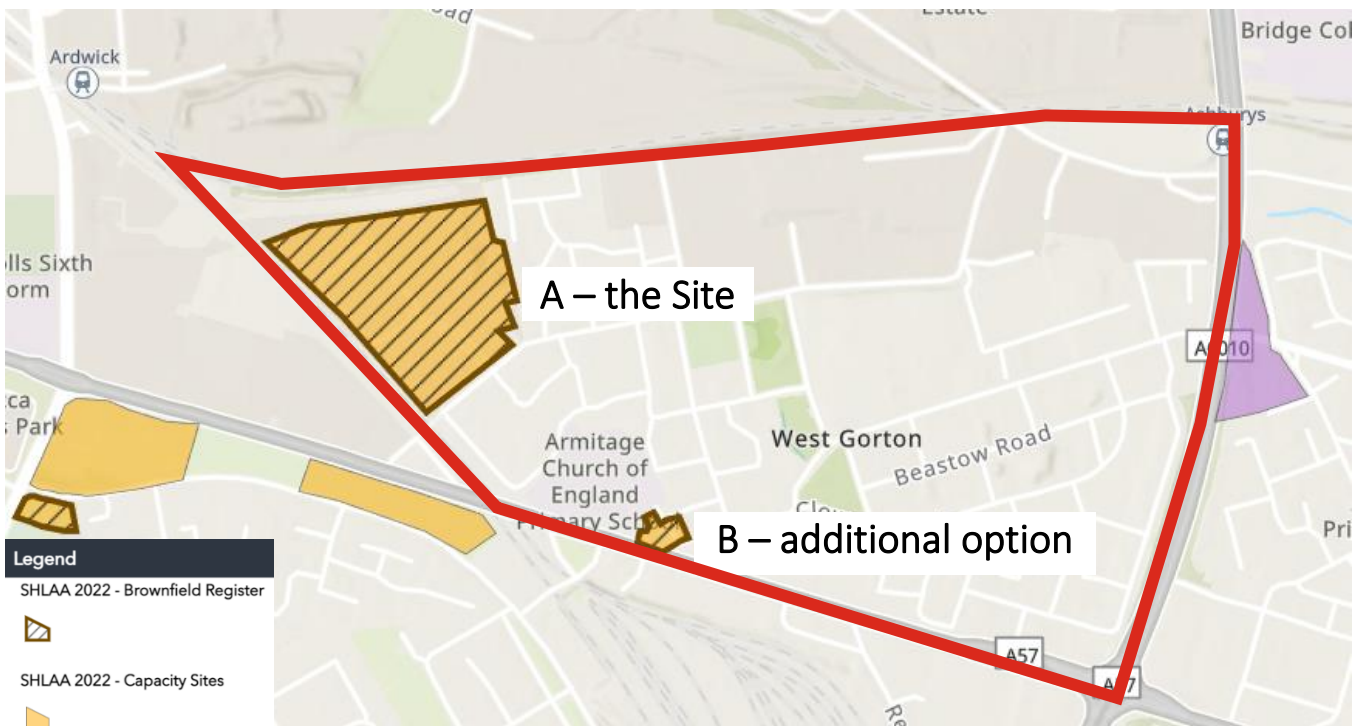


Figure 7 Site identified as suitable for housing in the 2022 SHLAA, marked as Site S (Available at: [SHLAA 2020 with Brownfield Sites \(arcgis.com\)](https://www.arcgis.com/webapp/shl2022/))

- 4.4. There is only one additional site within the search area (marked as B), Site Reference: Adwick1902. This site is due to come forward at a later stage (Year 11 – 15) and has a much lower capacity of 25 units.
- 4.5. It is spread across two small sites on Haverford St, Manchester, to the rear of Armitage CE Primary School.



Figure 8 Indicative site area

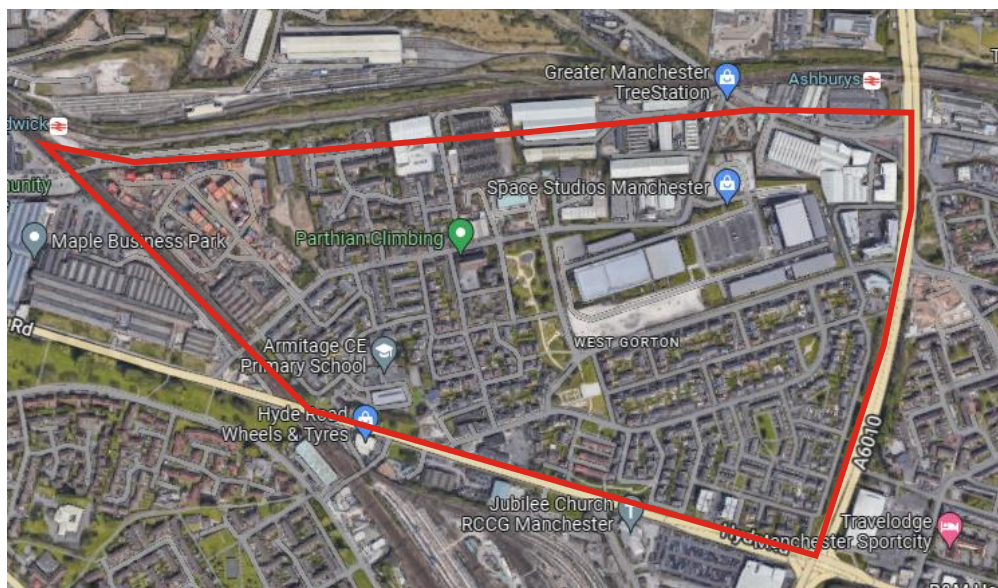
- 4.6. The purpose of this site is for the provision of additional units within the West Gorton Masterplan.
- 4.7. The site is not at risk of surface water flooding, however, given the size of this site, it is not a like-for-like replacement of the Proposed Development. Plainly, using SHLAA figures, it has capacity for 345 less homes.
- 4.8. Finally, an online search does not indicate that the site has been available for purchase and our client does not have any agreement in place to develop the site, unlike the Proposed Development site. Therefore, this option is not a meaningful alternative as the site is not available for development.

Approved schemes (undelivered)

- 4.9. The 2022 SHLAA sets out that no schemes within the search area have been approved for development and undelivered.

Windfall sites

- 4.10. Windfall sites are sites which have not been specifically identified as available in the Local Plan process. Given the degree of existing development within the search area (see below), much of which is relatively new regeneration, it is considered very unlikely that any site of a similar size will come forward.



Summary

- 4.11. The Site is identified as suitable for housing, with very limited options for brownfield re-development within the vicinity of the area.
- 4.12. It supports local and sub-regional aspirations to deliver regeneration to the area and can contribute to meeting housing targets.
- 4.13. Additional Flood Risk information is in the Flood Risk Assessment submitted with this application.
- 4.14. The only alternative site has a much lower capacity and cannot be confirmed as available for development within the same timeframe as the Proposed Development.

5. Summary

- 5.1. This report has demonstrated that Sequential Test has been met for the proposed development.
- 5.2. In accordance with the NPPF (para 162) alternative sites were considered. It is though demonstrated that there are no other 'reasonably available' sites within the search area. The Sequential Test is therefore passed
- 5.3. An overview of the flood risk on Site is provided and the detailed assessment is in the FRA submitted with the planning application, which justifies the acceptability and sustainability of the Site for development.
- 5.4. To re-emphasise:
- There is an established strategic need for housing in this broader locality as identified within Places for Everyone , the Development Plan and supporting Guidance (such as Our Manchester Strategy 2016 – 2025)to prioritise the development of brownfield sites at appropriate densities
 - The site is identified for residential development in the 2022 SHLAA.
 - The most up to date EA flood zone maps identify the site Flood Zone 1 and 2
- 5.5. In conclusion, Para. 167 of the NPPF is met as:
- limited sites are available for development in the area, and brownfield regeneration is met; and
 - flood mitigation measures are proposed to manage any risk, such as swales and rain gardens.

Appendix 1: Environment Agency response to the submitted application

On 21st September a response was received from the Environment Agency which included the following:

“Note to LPA - Flood Risk Commentary and Assessment

Review of the mapping held by the Environment Agency confirms that the proposed development is situated primarily within Flood Zone 2, which is land defined under the associated planning practice guidance at being at risk of flooding.

Studying the scope of proposed development / the application they note that the development is for the creation of a residential development with associated landscaping and infrastructure. As identified under Annex 3 of the NPFF, associated with determining flood risk vulnerability, they note that this form of development is classified as a ‘More Vulnerable’ form of development. This vulnerability classification in conjunction with Table 2 (Flood risk vulnerability and flood zone ‘incompatibility’) of flood risk planning practice guidance does not require application of the Exceptions Test.

Re-assessment of flood risk vulnerability will be required should alteration to the quantum of development be proposed e.g. the introduction of basement dwellings which has associated with it a greater flood risk vulnerability classification.

In relation to development proposal which meet the criteria detailed above, they produced a series of standard comments for local planning authorities and planning applicants to refer to, known as our Flood Risk Standing Advice (FRSA) and which replace the need for direct consultation with the EA for this aspect (flood risk) of a development. This development proposal falls within this category.

Our FRSA can be viewed at <https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice>. They recommend that their standing advice in full before determining the application/ this aspect of the proposal and that consultation from the Lead Local Flood Authority on the wider contents of the Flood Risk Assessment (FRA) is sought.

However, further to the above, they would also like to take this opportunity to provide the following advice and guidance.

They note from the contents of the FRA (FD019) submitted that reference is made to Table 3 enabling determination as to whether the Sequential Test is passed. In relation to this, they would advise that the following-on from date in which the FRA the associated with this application has been prepared the flood risk planning practice guidance has been updated.

‘Table 3’ reference within the FRA is now ‘Table 2’ within the latest iteration of the flood risk planning practice guidance. However, this alternation of number notwithstanding, they advise that as detailed

within notes associated with this guidance table, reference to this should not be considered to sufficiently demonstrate application of the sequential test.

In accordance with the National Planning Policy Framework (paragraph 162), development in flood risk areas should not be permitted if there are reasonably available alternative sites, appropriate for the proposed development, in areas with a lower risk of flooding. The sequential test establishes if this is the case. Development is in a flood risk area if it is in Flood Zone 2 or 3, or it is within Flood Zone 1 and the strategic flood risk assessment shows it to be at future flood risk or at risk from other sources of flooding such as surface water or groundwater.

The only developments exempt from the sequential test in flood risk areas are:

- Householder developments such as residential extensions, conservatories or loft conversions*
- Small non-residential extensions with a footprint of less than 250sqm*
- Changes of use (except changes of use to a caravan, camping or chalet site, or to a mobile home or park home site)*
- Applications for development on sites allocated in the development plan through the sequential test, which are consistent with the use for which the site was allocated.*

Avoiding flood risk through the sequential test is the most effective way of addressing flood risk because it places the least reliance on measures such as flood defences, flood warnings and property level resilience.

It is for the LPA to decide whether the sequential test has been satisfied, but the applicant should demonstrate to you, with evidence, what area of search has been used. Further guidance on the area of search can be found in the planning practice guidance [here](#) .

They can advise on the relative flood risk between the proposed site and any alternative sites identified - although the strategic flood risk assessment should allow you to do this yourself in most cases. They will not advise on whether alternative sites are reasonably available or whether they would be suitable for the proposed development. They also won't advise on whether there are sustainable development objectives that mean steering the development to any alternative sites would be inappropriate."



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