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Flood Risk Assessment

in support of a change of use application for
3 Mirabel Street, Manchester, M3 1PJ



Site Location:	3 Mirabel Street, Manchester, M3 1PJ
Date:	April 2026
Planning Authority:	Manchester City Council
Author:	Antony Riozzi BEng Hons
Organisation:	Homz

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Site Address:	3 Mirabel Street, Manchester, M3 1PJ
Local Planning Authority:	Manchester City Council (MCC)
LLFA:	Manchester City Council (as unitary authority)
Proposal:	Change of use of existing commercial unit (railway arch) to indoor gym and fitness facility (Use Class E(d))
Client:	Nikko Shillabeer
Prepared For:	Nikko Shillabeer (c/o Homz)
Prepared By:	Homz – Planning and Environmental Consultants
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Date:	April 2026
Version:	Rev 6
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This report has been prepared by Homz with all reasonable skill, care and diligence, within the terms of the client's appointment and in accordance with accepted professional practice for flood risk assessments. The findings are based on information available at the time of writing, including Environment Agency mapping, applicant-supplied planning drawings, and other published data sources referenced herein. No intrusive ground investigation or topographical survey has been undertaken.

This document is intended solely to support the planning application for 3 Mirabel Street, Manchester, M3 1PJ and must not be reproduced, circulated, or relied upon by any third party without the prior written consent of Homz.

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Validation Compliance Statement

This Flood Risk Assessment has been prepared in accordance with the National Planning Policy Framework (NPPF, December 2024), Planning Practice Guidance (PPG): Flood Risk and Coastal Change (updated September 2025), and the Environment Agency Standing Advice for flood risk assessments in Flood Zone 2.

It provides the level of information required by Manchester City Council's Local Validation Checklist for change of use applications within Flood Zone 2, demonstrating that the proposed development is appropriate in flood risk terms and will not increase flood risk on or off the site.

Executive Summary

This Flood Risk Assessment (FRA) has been prepared by Homz to support a planning application for the change of use of an existing commercial unit at 3 Mirabel Street, Manchester, M3 1PJ to an indoor gym and fitness facility (Use Class E(d)), submitted to Manchester City Council (MCC).

Topic	Summary
Flood Zone Classification	Flood Zone 2 (EA Flood Map for Planning, 04 April 2026; Easting/Northing 383815/398978). Flood Zone 3 is present in the immediate vicinity, associated with the River Irwell and River Irk. A flood defence is present on the Irwell corridor. EA Long-Term Flood Risk mapping indicates a medium to high chance of flooding in the 2036–2069 epoch.
Vulnerability Classification	Use Class E(d) – indoor sport, recreation or fitness – falls within the 'assembly and leisure' category in PPG (September 2025) Table 2, which is explicitly classified as Less Vulnerable. No sleeping accommodation is provided.
Sequential Test	Applied (non-householder change of use application). The test is satisfied: the proposed use is tied to a specific existing commercial railway arch unit with no realistically available and comparable sequentially preferable alternative within the defined search area of the Mirabel Street / Manchester Victoria locality.
Exception Test	Not required. PPG (September 2025) Table 3 confirms that Less Vulnerable development (assembly and leisure) is acceptable in Flood Zone 2 without the Exception Test.
Surface Water Risk	Very Low. The railway viaduct structure sits proud of the surrounding street levels. EA Risk of Flooding from Surface Water mapping confirms the arch unit is outside all RoFSW extents at the 1 in 30, 1 in 100 and 1 in 1,000 year return periods.
Flood Risk to Unit	The existing railway arch provides inherent flood resistance: solid masonry construction, floor level approximately 28.1m AOD, and no change to the external structural envelope or floor level proposed.
Historic Flooding	EA Historic Flood Extent mapping has been reviewed. The mapping reflects the fluvial FZ2 designation in this area associated with the River Irwell. No recorded inundation of the arch unit itself has been identified.
Drainage	No change to drainage arrangements, impermeable area or external works is proposed. The application involves internal alterations only. No SuDS assessment or drainage calculations are required.
Flood Warning and Evacuation	Recommended that the operator registers for EA Flood Warnings Direct covering the River Irwell at Manchester and maintains a simple Flood Response Plan for the premises.
Overall Conclusion	The proposed change of use to a Use Class E(d) gym is acceptable in flood risk terms. The development is Less Vulnerable, in Flood Zone 2, the Sequential Test is satisfied, and no Exception Test is required. No increase in flood risk on or off site will result.

Abbreviations and Acronyms

Abbreviation	Definition
AOD	Above Ordnance Datum
AEP	Annual Exceedance Probability
CC	Climate Change
EA	Environment Agency
FMP	Flood Map for Planning (EA)
FRA	Flood Risk Assessment
FZ1/FZ2/FZ3	Flood Zone 1 / 2 / 3 as defined by the EA Flood Map for Planning
GMSFRA	Greater Manchester Strategic Flood Risk Assessment
MCC	Manchester City Council (Local Planning Authority and LLFA)
LLFA	Lead Local Flood Authority
NPPF	National Planning Policy Framework (December 2024)
PPG	Planning Practice Guidance: Flood Risk and Coastal Change (updated September 2025)
RoFSW	Risk of Flooding from Surface Water (EA national mapping)
SFRA	Strategic Flood Risk Assessment
UU	United Utilities (sewerage undertaker for the Manchester area)

1. Introduction

1.1 Appointment

Homz has been appointed to prepare this Flood Risk Assessment to support a planning application for the change of use of an existing commercial unit at 3 Mirabel Street, Manchester, M3 1PJ to an indoor gym and fitness facility (Use Class E(d)), submitted to Manchester City Council (MCC). This report has been prepared by Antony Riozzi BEng Hons (Flood Risk & Drainage Consultant, Homz).

1.2 Report Rationale

The NPPF (December 2024) and PPG: Flood Risk and Coastal Change (updated September 2025) require a site-specific flood risk assessment for planning applications in Flood Zones 2 or 3. The EA Flood Map for Planning (04 April 2026) confirms the application site is within Flood Zone 2. This FRA has been prepared to demonstrate that the proposed use is compatible with the flood zone designation, that the development is safe for its users and will not increase flood risk elsewhere.

1.3 Project Understanding

The application site is an existing commercial unit located within a railway arch on the south side of Mirabel Street, Manchester M3 1PJ, forming part of a continuous row of railway arch commercial units beneath the elevated viaduct infrastructure adjacent to Manchester Victoria station. The existing lawful use is commercial (Use Class E). The proposal seeks to change this to an indoor gym and fitness facility (Use Class E(d)). All works are internal only: open-plan fitness space, changing areas, WCs, reception zone, a metal functional fitness rig and OSB wall lining. No external building works, changes to the floor level, or increase in impermeable area are proposed.

1.4 Scope of Report

This report addresses the following matters:

- Flood zone classification of the application site
- Sequential Test and Exception Test applicability under PPG (September 2025)
- Flood risk vulnerability classification of the proposed use
- All sources of flood risk to and from the site
- Historic flood extent review
- Flood risk characteristics of the existing railway arch structure
- Safe access and egress
- Flood warning and evacuation considerations
- Drainage — confirmation that no new measures are required
- Compliance with national, strategic and local planning policy

1.5 Exclusions from Scope

Structural assessment of the railway arch or viaduct is excluded. Detailed hydraulic modelling of the River Irwell or its tributaries has not been undertaken; EA Flood Map for Planning extents are used throughout, which is appropriate and proportionate for a change of use application involving no external works. No drainage strategy or SuDS calculations are required as no change to impermeable area or external drainage arrangements is proposed.

1.6 Sources of Information

Source	Application
EA Flood Map for Planning (04 April 2026) Easting/Northing: 383815/398978	Flood zone classification; FZ2 confirmation
EA Long-Term Flood Risk Tool (2026)	2036–2069 epoch flood chance mapping; surface water risk ratings
EA Risk of Flooding from Surface Water 1 in 30 / 1 in 100 / 1 in 1,000 year extents (2026)	Surface water flood risk assessment at three return periods
EA Historic Flood Extent mapping (2026)	Review of recorded historic flooding in the site area
Greater Manchester Strategic Flood Risk Assessment (GMSFRA, Level 1)	Strategic flood risk context; River Irwell and Manchester city centre flood risk

NPPF December 2024	National planning policy on flood risk
PPG: Flood Risk and Coastal Change (updated September 2025)	Sequential/Exception Test; vulnerability classification; FRA scope
Homz Planning Drawings H-0603 series (26.03.2026)	Block plan, elevations; floor level and site configuration
Homz Planning Statement (March 2026)	Development description, policy context, use class confirmation
Manchester Core Strategy (2012, updated March 2024)	Local planning policy on flood risk and development management
Places for Everyone Joint Development Plan (adopted 2024)	Greater Manchester strategic planning policy
EA Climate Change Allowances (2022 update)	North West River Basin District allowances referenced

2. Purpose and Policy Context

2.1 National Planning Policy Framework (NPPF, December 2024)

The NPPF (December 2024) sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from the areas at highest risk. Where development is necessary in areas of flood risk, it should be made safe for its lifetime without increasing flood risk elsewhere. The NPPF requires a site-specific FRA for all applications in Flood Zones 2 and 3. This report satisfies that requirement.

2.2 Sequential Test

PPG (September 2025) requires that applicants demonstrate through the Sequential Test that there are no reasonably available sites in areas of lower flood probability that would be appropriate for the proposed development. The Sequential Test applies to this non-householder change of use application.

The Sequential Test is satisfied for the following reasons:

- The application relates to a specific, identifiable existing commercial unit within a railway arch at 3 Mirabel Street. The proposed gym use is operationally and commercially tied to this particular unit, which is held by the applicant.
- The relevant search area for a sequentially preferable site is the Mirabel Street / Manchester Victoria locality, within which no comparable railway arch or equivalent unit at a lower flood risk (Flood Zone 1) has been identified as available and suitable for this type of use.
- The change of use of an existing commercial unit to another commercial use within the same broad Use Class (E) does not trigger a search across the whole of the Manchester administrative area; the sequential search is appropriately constrained to the local area where the development is proposed.
- This conclusion is consistent with the approach endorsed by PPG (September 2025), which confirms that the Sequential Test should be applied in a proportionate and site-specific manner.

2.3 Exception Test

The Exception Test is not required in this case. PPG (September 2025) Table 3 (Flood risk vulnerability and flood zone compatibility) confirms that Less Vulnerable development is appropriate in Flood Zone 2 without requiring the Exception Test. As demonstrated in Section 2.4 below, the proposed use is Less Vulnerable. No Exception Test is therefore required.

2.4 Vulnerability Classification

PPG (September 2025) Table 2 sets out the flood risk vulnerability classification of different development types. The proposed use — an indoor gym and fitness facility (Use Class E(d): indoor sport, recreation or fitness) — falls within the 'assembly and leisure' category explicitly listed in PPG (September 2025) Table 2 as Less Vulnerable.

This classification is confirmed by the following characteristics of the proposed use:

- It is a commercial daytime and evening use — not a residential, sleeping or emergency services use.
- No sleeping accommodation is provided at the premises.
- Occupants (gym users and staff) are assumed to be able-bodied adults capable of self-evacuation.
- The use does not fall within the Highly Vulnerable or More Vulnerable categories defined in PPG (September 2025) Table 2.

PPG (September 2025) Table 3 confirms that Less Vulnerable development (including assembly and leisure) is appropriate in Flood Zones 1 and 2 without an Exception Test.

2.5 Local Planning Policy

Planning applications in Manchester are assessed against the statutory development plan, comprising the Manchester Core Strategy (2012, updated March 2024), the Places for Everyone Joint Development Plan (adopted 2024), and saved Unitary Development Plan (UDP) policies. The Core Strategy includes flood risk policies requiring development to be directed away from high-risk flood areas where possible, and where development is proposed in areas of flood risk, it must be designed to manage that risk appropriately and not increase flood risk elsewhere.

The Greater Manchester Strategic Flood Risk Assessment (GMSFRA) has been prepared to inform planning decisions across Greater Manchester. The GMSFRA confirms the River Irwell corridor as a significant source of fluvial flood risk within Manchester city centre, consistent with the FZ2 designation at this site. This FRA has been prepared having regard to the GMSFRA and is consistent with its findings and recommendations for development in the River Irwell floodplain.

The proposed change of use to a Less Vulnerable use (assembly and leisure) in Flood Zone 2 is consistent with both the Core Strategy flood risk policies and the Places for Everyone plan, which supports regeneration and the activation of existing commercial units within the city centre.

3. Site Description and Existing Conditions

3.1 Site Location

The application site is located at 3 Mirabel Street, Manchester, M3 1PJ (Easting 383815, Northing 398978), on the south side of Mirabel Street within Manchester city centre. The unit is located within a railway arch forming part of the continuous viaduct infrastructure associated with the approach lines to Manchester Victoria station. Mirabel Street is a mixed commercial and residential road on the edge of the city centre, within the Greengate / Deansgate area of Manchester. The area has undergone significant regeneration, with recent planning approvals for large mixed-use residential and commercial developments on Mirabel Street and Great Ducie Street.

3.2 Description of the Application Unit

- Existing use: commercial (Use Class E)
- Proposed use: indoor gym and fitness facility (Use Class E(d))
- Construction: existing railway arch — solid Victorian masonry within the historic viaduct structure
- All proposed works are internal only: open-plan fitness space, changing areas, WCs, reception zone, metal functional fitness rig and 18mm OSB wall lining
- No external building works; no change to the external structural envelope; no change to the floor level
- No increase in impermeable area; no new hardstanding
- No sleeping accommodation provided
- The site lies within the setting of several Grade II listed structures including the Sorting Office (7 Mirabel Street), North Bridge and Middle Bridge (Victoria Street)

3.3 Topography and Floor Levels

Block plan spot levels from the submitted drawings (H-0603 series) indicate ground and floor levels in the area of approximately 28.1m AOD at the arch unit and 29.1–29.2m AOD to the north of the site. The arch floor level is taken as approximately 28.1m AOD for the purposes of this assessment, consistent with the block plan. No formal topographic survey has been undertaken; this is appropriate and proportionate for a change of use application with no proposed physical alterations.

3.4 Watercourses

The River Irwell flows generally north to south to the west of the site, with the River Irk joining from the north-east in the vicinity of Manchester Victoria station. Both rivers are designated Main Rivers. The EA Flood Map for Planning confirms Flood Zone 2 at the application site, with Flood Zone 3 present in proximity to the river channels to the north and east. A flood defence (orange line on the FMP) is visible on the Irwell corridor to the north-west of the site, associated with the Manchester city-centre flood defence scheme.

3.5 Geology and Groundwater

The site is within a dense urban environment in Manchester city centre, underlain by made ground and urban substrates overlying Carboniferous bedrock. No groundwater flood alert area is identified for this location. Groundwater is not considered a material flood risk source for this application.

3.6 Existing Drainage

No change to the drainage arrangements is proposed. The change of use is entirely internal. No new impermeable area is introduced and the proposed gym use does not alter surface water runoff characteristics. United Utilities (UU) is the sewerage undertaker for the area. No drainage assessment, SuDS strategy or drainage calculations are required.

4. Flood Zone Classification

4.1 EA Flood Zone Definitions

The Environment Agency defines flood zones for planning purposes as follows:

- Flood Zone 1 (Low Probability): Annual probability of flooding less than 0.1% (less than 1 in 1,000 year). No flood zone shading on EA maps.
- Flood Zone 2 (Medium Probability): Annual probability of fluvial flooding between 0.1% (1 in 1,000) and 1% (1 in 100).
- Flood Zone 3a (High Probability): Annual probability of fluvial flooding of 1% (1 in 100) or greater.
- Flood Zone 3b (Functional Floodplain): Land where water flows or is stored in times of flood.

4.2 EA Flood Zone Classification – Application Site

Figure 1 below reproduces the EA Flood Map for Planning extract for the application site (Easting 383815, Northing 398978), obtained on 04 April 2026. The FMP certificate confirms the selected location is within Flood Zone 2 (medium probability of flooding).

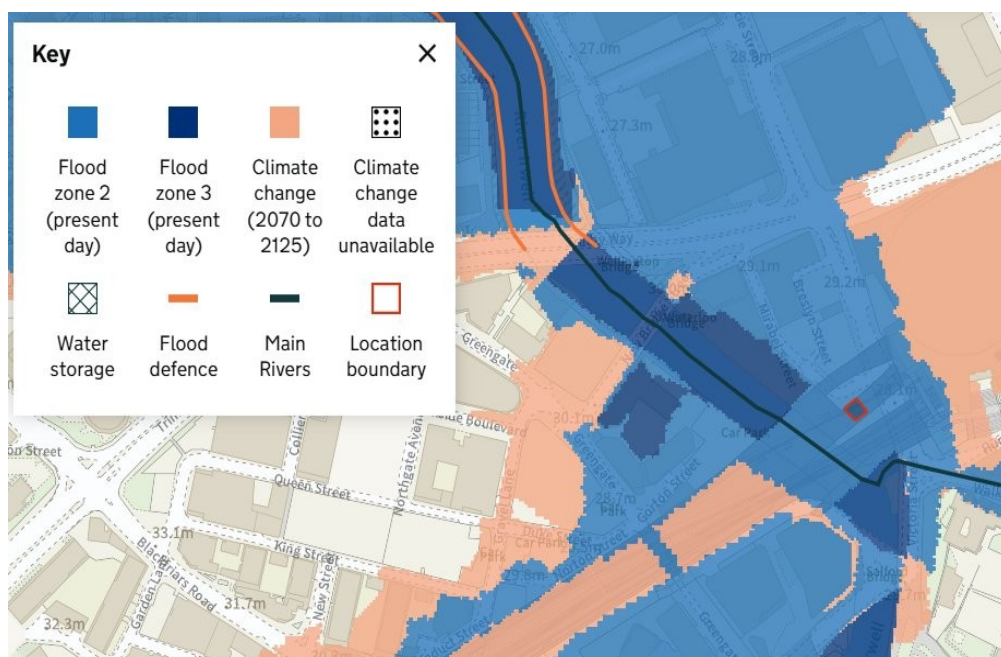


Figure 1: EA Flood Map for Planning – Flood Zone Classification, 3 Mirabel Street, Manchester M3 1PJ (Source: EA, April 2026)

The FMP map shows the application site (red square boundary) within Flood Zone 2 (light blue shading). Flood Zone 3 (dark blue) is present to the north associated with the River Irk, and to the east/south-east associated with the River Irwell. The orange line represents the flood defence feature on the Irwell corridor. The dark green line indicates the Main River (River Irwell). A Climate Change overlay (salmon/orange shading) extends across the wider area for the 2070–2125 epoch; this is addressed in Section 6.3.

4.3 Long-Term Flood Risk (2036–2069 Epoch)

Figure 2 shows the EA Long-Term Flood Risk mapping for the site, indicating projected flood chance from rivers and sea for the 2036–2069 epoch, accounting for the effects of climate change.

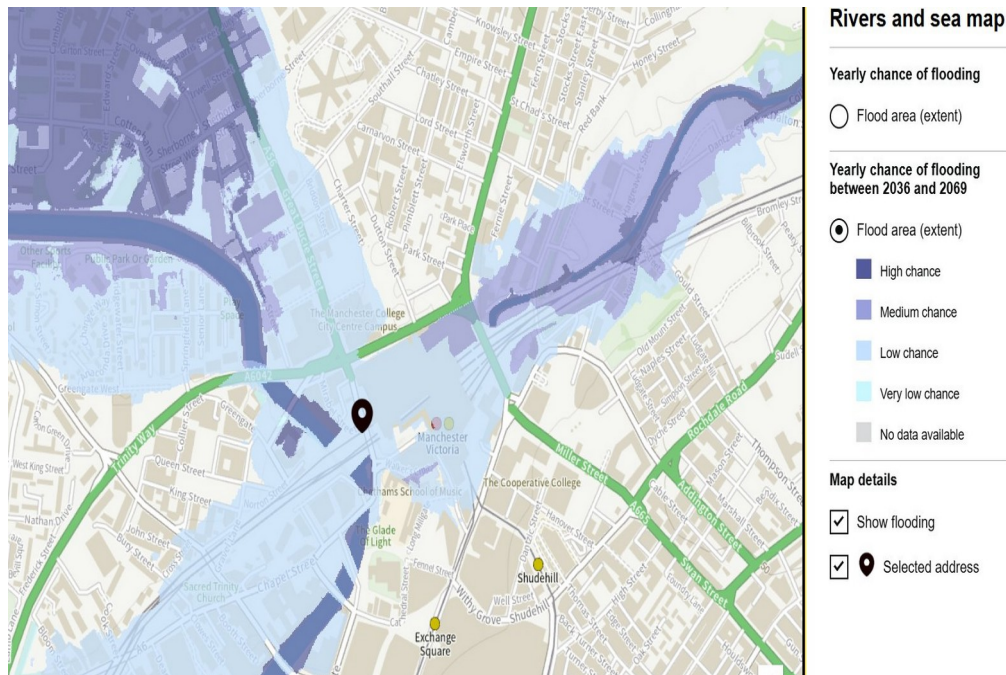


Figure 2: EA Long-Term Flood Risk from Rivers and Sea (2036–2069 Epoch), 3 Mirabel Street, Manchester M3 1PJ (Source: EA, April 2026)

The long-term mapping indicates that the application site falls within a medium to high chance flood area for the 2036–2069 epoch, reflecting the projected influence of climate change on River Irwell flood extents. This is consistent with the FZ2 designation and is addressed in Section 6.3.

4.4 Historic Flood Extent

EA Historic Flood Extent mapping has been reviewed as part of this assessment. The historic flood extent data reflects past recorded flooding events in the River Irwell catchment and is consistent with the Flood Zone 2 designation in this part of Manchester city centre. No recorded inundation of the specific arch unit at 3 Mirabel Street has been identified from the EA historic flood extent mapping. The railway viaduct structure's elevation above surrounding street levels is considered a contributory factor. This is consistent with the unit having been in continuous commercial use within the flood zone.

4.5 Flood Zone Classification Summary

Element	Present-Day Flood Zone	Climate Change (2036–2069)	Commentary
Application site (arch unit)	Flood Zone 2	Medium–High chance (2036–2069)	FZ2 confirmed by EA FMP certificate 04.04.2026. Addressed in Sections 5 and 6.
Surrounding street level	FZ2 / FZ3 in proximity	Extended CC extents	FZ3 present in proximity to River Irwell and Irk. Flood defence present on Irwell corridor.

5. Sources of Flood Risk

All potential sources of flood risk to and from the application site have been assessed using available EA data and professional judgement. The findings are summarised in the table below.

Flood Source	Present Risk	Long-Term Risk	Commentary
Fluvial (rivers)	Medium (FZ2)	Medium–High (2036–2069)	Site is within FZ2 (EA FMP, April 2026). River Irwell and River Irk are in proximity. A flood defence on the Irwell corridor provides a degree of protection; residual risk behind the defence is acknowledged. No change to the site or its flood risk exposure is proposed. Flood risk to the unit is no greater than under the existing commercial use.
Surface water	Very Low	Very Low	EA RoFSW mapping reviewed at 1 in 30, 1 in 100 and 1 in 1,000 year return periods (Figures 3–5 below). The viaduct structure and arch unit are not within any surface water flood extent at any return period reviewed. Surface water collects in adjacent low-lying street areas but does not affect the elevated arch unit. Risk is Very Low.
Groundwater	Negligible	Negligible	EA Long-Term Flood Risk data confirms the site is outside a groundwater flood alert area. No groundwater levels are monitored at this location. The EA notes there may still be a residual risk of groundwater flooding; however, given the elevated nature of the viaduct structure and the absence of any below-ground floor areas, the risk to the arch unit is considered Negligible.
Sewer flooding	Low	Low	United Utilities serves the area. The change of use does not materially increase foul water flows. No new impermeable area introduced. No increase in sewer flooding risk.
Historic flooding	Consistent with FZ2	—	EA Historic Flood Extent mapping reviewed. No recorded inundation of the arch unit identified. Consistent with the unit's history of continuous commercial use within FZ2.
Reservoir	Remote	Remote	EA Long-Term Flood Risk data indicates there is a risk of flooding from reservoirs in this area. Reservoir failure is a very remote and extreme event; it does not affect the planning flood zone classification and is not a material planning constraint for this change of use application. No mitigation is required.
Artificial sources (other)	Negligible	Negligible	No canals, water mains or other artificial flood sources presenting significant risk identified.
OVERALL	Medium (FZ2)	Medium	Fluvial flood risk is the primary source, consistent with FZ2 designation. The proposed Less Vulnerable use is appropriate for FZ2. No increase in flood risk on or off site results from the change of use.

5.1 Surface Water Flood Risk Mapping

Figures 3, 4 and 5 below show the EA Risk of Flooding from Surface Water mapping at the 1 in 30, 1 in 100 and 1 in 1,000 year return periods respectively. The application site boundary is shown as the red square in each figure.

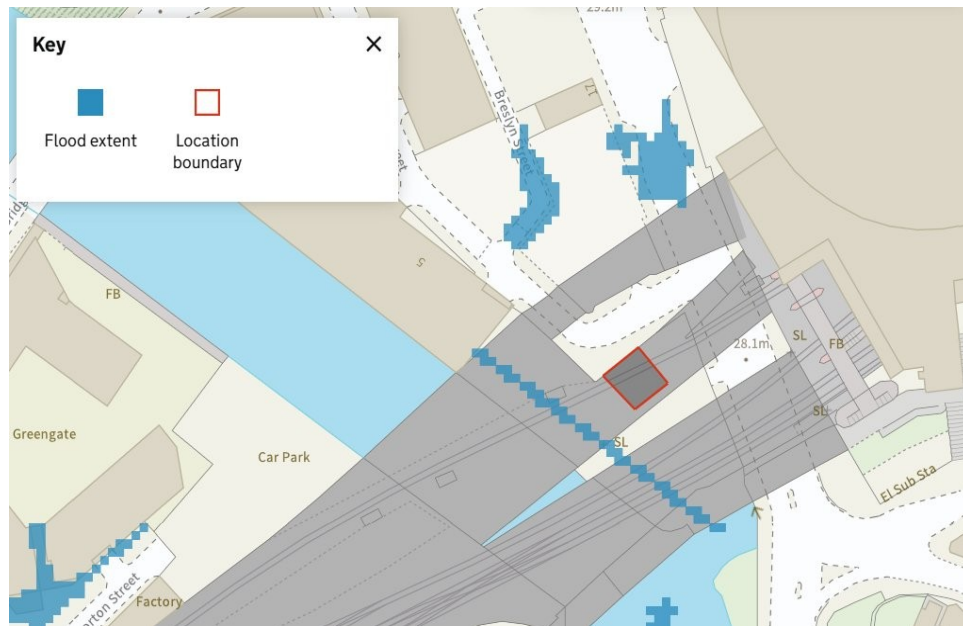


Figure 3: EA Risk of Flooding from Surface Water – 1 in 30 Year (3.3% AEP), 3 Mirabel Street, Manchester M3 1PJ
(Source: EA, April 2026)



Figure 4: EA Risk of Flooding from Surface Water – 1 in 100 Year (1% AEP), 3 Mirabel Street, Manchester M3 1PJ
(Source: EA, April 2026)

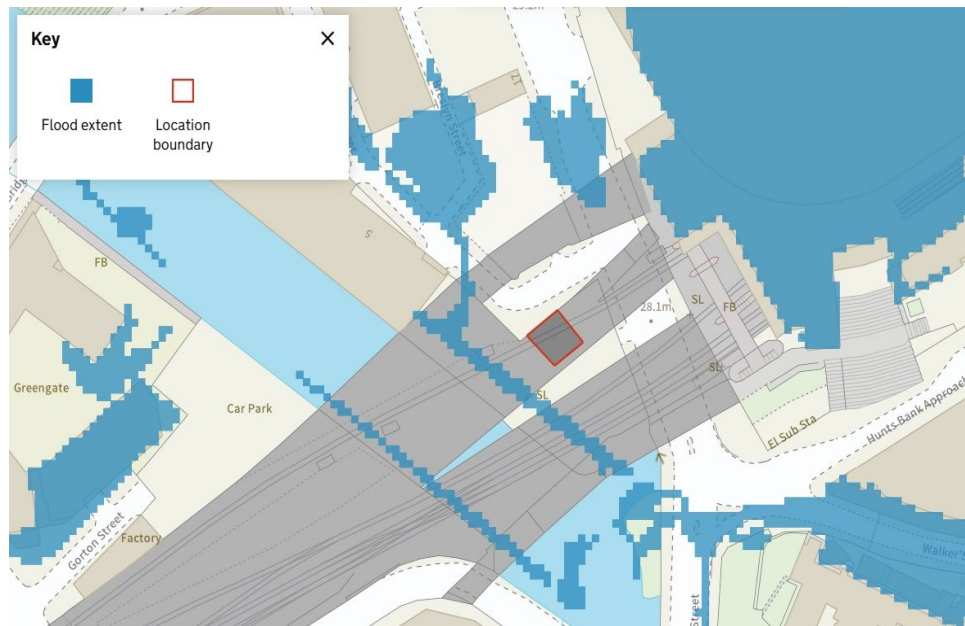


Figure 5: EA Risk of Flooding from Surface Water – 1 in 1,000 Year (0.1% AEP), 3 Mirabel Street, Manchester M3 1PJ
(Source: EA, April 2026)

As shown in Figures 3 to 5, the application site (railway arch unit within the viaduct structure) does not fall within any surface water flood extent at the 1 in 30, 1 in 100 or 1 in 1,000 year return periods. At extreme return periods, surface water flooding affects the surrounding street network but the elevated arch structure remains clear throughout. Surface water flood risk to the unit is Very Low.

6. Flood Risk Mitigation and Safe Access

6.1 Existing Structure – Inherent Flood Resistance

The application unit is located within an existing Victorian railway arch forming part of the historic viaduct at Mirabel Street. The arch structure provides the following inherent flood resistance characteristics, which are material to the assessment of flood risk to the proposed use:

- Solid masonry construction: the railway arch is constructed from robust Victorian brickwork and masonry, providing a structurally resistant enclosure that has withstood the conditions of the River Irwell floodplain for many decades.
- Elevated floor level: the arch floor level is at approximately 28.1m AOD (from block plan spot levels, Homz drawing H-0603 series). The masonry threshold at the arch entrance provides a degree of physical separation from external ground-level flooding.
- No change to floor level or structural envelope: the proposed change of use involves internal works only. No alteration to the floor level, threshold height, arch structure or external fabric is proposed.
- No basement or below-ground elements: the unit does not involve any below-ground floor area, reducing vulnerability to rapid inundation.
- Existing commercial use: the unit has been in continuous commercial use within Flood Zone 2, demonstrating that it has not been subject to inundation that has prevented its use to date.

6.2 Floor Level and Flood Level Relationship

No EA modelled flood level data for this specific location has been made available to inform this assessment, and detailed hydraulic modelling has not been undertaken. This is considered appropriate and proportionate for a change of use application involving no physical alterations to the structure.

For a change of use of an existing unit in Flood Zone 2 to a Less Vulnerable use, the relevant planning test is whether the use is compatible with the flood zone designation and whether safe access and egress can be maintained — not whether modelled flood depths are zero. The existing arch structure has demonstrably supported commercial use within Flood Zone 2 and the proposed gym use is no more vulnerable than the existing commercial use. Flood risk to the unit does not increase as a result of this application.

6.3 Climate Change

The EA Long-Term Flood Risk mapping indicates a medium to high chance of flooding in the 2036–2069 epoch, reflecting climate change projections for the River Irwell catchment. The North West River Basin District EA Climate Change Allowances (2022 update) are material to the assessment of long-term flood risk at this site. The following considerations apply:

- The proposed Use Class E(d) gym remains classified as Less Vulnerable for the lifetime of the development. PPG (September 2025) confirms that Less Vulnerable development is appropriate in Flood Zone 2 and in areas that may transition toward FZ2 under climate change projections.
- The proposed use involves no sleeping accommodation. Occupants can evacuate freely at any time during a flood event.
- No change to the floor level, external fabric or drainage is proposed. The climate change flood risk to the unit is the same as the existing situation.
- The flood warning and evacuation procedures recommended in Section 6.5 are the proportionate mitigation response to residual climate change risk for a Less Vulnerable commercial use.

6.4 Safe Access and Egress

The application site is accessed from Mirabel Street to the north. The following considerations apply to safe access and egress:

- The proposed use is a daytime and evening commercial use. No overnight occupation or sleeping accommodation is provided.
- Gym users and staff are assumed to be able-bodied adults capable of self-evacuation in the event of a flood warning.
- EA surface water mapping (Figures 3–5) does not indicate that Mirabel Street or the immediate access routes are at risk of significant surface water inundation. The principal flood risk is fluvial, which is subject to EA flood warning.
- In the event of a flood warning, the premises can be closed and evacuated in an orderly manner, consistent with standard commercial flood management practice.

- The site is in close proximity to Manchester Victoria station and within a highly connected city-centre transport network, providing multiple safe egress routes from the area.

Safe access and egress for a Less Vulnerable gym use at this location is considered satisfactory and proportionate, consistent with NPPF (December 2024) and PPG (September 2025) requirements.

6.5 Flood Warning and Evacuation

The River Irwell at Manchester is covered by EA Flood Warning areas. It is recommended that:

- The operator of the gym facility registers for EA Flood Warnings Direct (check-for-flooding.service.gov.uk) for the relevant River Irwell warning area covering the Manchester city centre reach.
- A simple Flood Response Plan (FRP) is maintained for the premises, setting out the actions to be taken upon receipt of a Flood Alert and Flood Warning, including safe evacuation of users and staff, and the protection of electrical equipment and contents.
- The FRP is reviewed annually and updated where the operational arrangements of the premises change.

These measures are proportionate to the scale and nature of the proposed Less Vulnerable use and represent good practice for a commercial premises in Flood Zone 2. This approach is consistent with EA Standing Advice and NPPF (December 2024) requirements for making development safe for its users.

6.6 Flood Risk Activity Permit

The EA Flood Risk Activities (Environmental Permitting) Regulations 2016 require a Flood Risk Activity Permit (or exempt activity registration) for certain works within Flood Zones 2 and 3 or within 8 metres of a Main River. The proposed development involves internal works only within an existing railway arch. No physical works to the external fabric, ground levels, or structure within the flood zone or in proximity to the Main River (River Irwell or River Irk) are proposed. No Flood Risk Activity Permit is therefore required for this application.

6.7 Drainage – No Change Required

No change to the drainage arrangements, impermeable area, or external works is proposed. The change of use is entirely internal. Surface water runoff from the application site will remain unchanged. No SuDS strategy, drainage assessment or drainage calculations are required to support this application. This is consistent with the requirements of Manchester City Council as LLFA for minor change of use applications involving no new external works.

7. Conclusion

This Flood Risk Assessment has been prepared by Homz (Antony Riozzi BEng Hons) to support a planning application for the change of use of an existing commercial unit at 3 Mirabel Street, Manchester, M3 1PJ to an indoor gym and fitness facility (Use Class E(d)), submitted to Manchester City Council. The key conclusions are as follows:

- The application site is within Flood Zone 2, as confirmed by the EA Flood Map for Planning (04 April 2026, Easting/Northing 383815/398978). Flood Zone 3 is present in the vicinity of the River Irwell and River Irk.
- Use Class E(d) (indoor sport, recreation and fitness) falls within the 'assembly and leisure' category in PPG (September 2025) Table 2, which is explicitly classified as Less Vulnerable. The proposed use is compatible with Flood Zone 2 without requiring the Exception Test (PPG September 2025, Table 3).
- The Sequential Test has been applied. The test is satisfied: the proposed use is tied to a specific existing commercial railway arch unit with no realistically available or comparable sequentially preferable alternative within the Mirabel Street / Manchester Victoria locality.
- The Exception Test is not required for Less Vulnerable development (assembly and leisure) in Flood Zone 2 (PPG September 2025, Table 3).
- Surface water flood risk to the arch unit is Very Low. EA RoFSW mapping confirms the unit is outside all surface water flood extents at the 1 in 30, 1 in 100 and 1 in 1,000 year return periods.
- No recorded historic inundation of the arch unit has been identified from EA Historic Flood Extent mapping, consistent with the unit's history of continuous commercial use within Flood Zone 2.
- The existing railway arch provides inherent flood resistance. No change to the floor level (~28.1m AOD), external fabric, or structural envelope is proposed. Flood risk to the unit does not increase as a result of this application.
- Safe access and egress is achievable for a daytime commercial Less Vulnerable use. No sleeping accommodation is provided. Occupants can evacuate freely during a flood event.
- It is recommended that the operator registers for EA Flood Warnings Direct for the River Irwell at Manchester and maintains a simple Flood Response Plan for the premises.
- No change to drainage, impermeable area, or external works is proposed. No SuDS assessment or drainage calculations are required.
- No Flood Risk Activity Permit is required for this application.
- The development is considered acceptable in flood risk terms and is consistent with NPPF (December 2024), PPG: Flood Risk and Coastal Change (updated September 2025), the Manchester Core Strategy flood risk policies, and the Places for Everyone Joint Development Plan.

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