

FLOOD RISK ASSESSMENT

1. Introduction and Scope

1.1 Purpose of the Assessment

This Flood Risk Assessment has been prepared in support of a full planning application seeking consent for the change of use of an existing industrial building at 11 Sherborne Street, Cheetham Hill, Manchester (M3 1JS) to an indoor sport and wellness facility within Use Class E(d), together with a modest ancillary café. The assessment has been prepared to an appeal-ready standard and adopts a strictly factual, policy-led and evidence-based approach, recognising that the site lies within Flood Zone 3 and that flood risk therefore represents a key material consideration in the determination of the application.

The purpose of this assessment is to demonstrate, in clear, technical and policy-compliant terms, that the proposed development is appropriate in flood risk terms notwithstanding its Flood Zone 3 location, that it will be safe for its lifetime taking into account the effects of climate change, that it will not increase flood risk elsewhere, and that it accords fully with the requirements of the National Planning Policy Framework, the Draft Manchester Local Plan 2025 and the Places for Everyone Joint Development Plan. The assessment has been structured to address these matters systematically, with particular emphasis placed on the correct application of national policy in relation to changes of use, the identification of the appropriate flood risk vulnerability classification, and the demonstration that residual risk can be appropriately managed through resilience and operational measures.

The proposal relates solely to the reuse of an existing building and does not involve any extension to the building footprint, any increase in impermeable area, any alteration to site levels or any modification to the established drainage regime serving the site. The physical characteristics of the site therefore remain entirely unchanged. This is a fundamental consideration in flood risk terms. Flood risk is principally influenced by changes to landform, runoff characteristics, flood storage capacity and drainage infrastructure. In the absence of any such changes, there is no mechanism through which the development could increase flood risk either on-site or elsewhere.

It is also important to distinguish clearly between the presence of flood risk and the acceptability of development. The fact that a site lies within Flood Zone 3 does not, in itself, render development inappropriate or unacceptable. National planning policy adopts a risk-based approach which requires consideration of the nature of the proposed use, its flood risk vulnerability classification and whether the development can be demonstrated to be safe for its lifetime. The proposed indoor sport and wellness facility falls within the “Less Vulnerable” category as defined by national Planning Practice Guidance and is therefore capable of being appropriate within Flood Zone 3, subject to the submission of a site-specific Flood Risk Assessment.

In preparing this assessment, full regard has been had to Environment Agency flood mapping, available site-specific information and the characteristics of the surrounding hydrological environment. The River Irwell, located approximately 250 metres to the south-west of the site, represents the principal source of fluvial flood risk. Available evidence indicates that flood levels associated with extreme events, including allowances for climate change, may approach or marginally exceed existing site levels. This establishes the presence of residual flood risk which must be appropriately assessed and managed. The purpose of this report is therefore not

to deny the existence of flood risk, but to demonstrate that the proposed development can safely operate within that context through appropriate resilience measures, operational controls and emergency planning procedures.

The scope of this assessment includes consideration of all relevant sources of flooding, including fluvial, surface water, sewer and groundwater flooding, together with an assessment of the likely interaction between those risks and the proposed development. It also considers the implications of climate change, the adequacy of safe access and egress arrangements, and the incorporation of flood resistance and resilience measures necessary to ensure lifetime safety. The methodology adopted is proportionate to the nature of the proposal, reflecting the fact that the development is a change of use within an existing building and does not involve operational or physical intensification of the site in hydrological terms.

A key principle underpinning this assessment is that the proposal does not alter the way in which the site physically interacts with floodwater. The existing building remains in situ, the established drainage system continues to operate as existing, and the impermeable characteristics of the site remain unchanged. As such, the proposal does not increase flood extent, flood depth, flood storage displacement or runoff rates. This is not a matter of planning balance or subjective judgement but of technical and physical reality.

The assessment also recognises that national policy requires a forward-looking approach to flood risk, ensuring that development remains safe over its lifetime taking account of climate change. The proposed use is inherently flexible and operationally manageable. It does not require permanent occupation, can respond effectively to flood warning systems and can cease operation in advance of extreme flood events where necessary. This operational flexibility is a significant factor in demonstrating compliance with national policy requirements relating to residual risk management and lifetime safety.

2. Policy Framework

2.1 National Planning Policy Framework

The National Planning Policy Framework establishes the overarching policy approach to the assessment and management of flood risk within the planning system. It requires that development is directed to areas of lowest probability of flooding through the application of the sequential approach, and that where development is proposed within areas at risk, it must be demonstrated to be safe for its lifetime without increasing flood risk elsewhere. It is critical, however, that these provisions are applied correctly and in full context. The Framework does not impose a blanket restriction on development within Flood Zone 3, nor does it require all forms of development within such areas to be refused. Instead, it adopts a nuanced and risk-based approach which differentiates between types of development, their vulnerability classification and the specific nature of the proposal.

A determinative provision of the Framework in this case is paragraph 176, which makes clear that applications for changes of use should not be subject to the sequential test or the exception test. This is not a discretionary position but an explicit policy instruction. The current proposal is a change of use within an existing building envelope, with no extension of footprint, no alteration to ground levels and no change to drainage characteristics. As such, the policy tests which would ordinarily apply to new development in Flood Zone 3 are expressly disappplied. The correct assessment must therefore focus on whether the development is safe

and whether flood risk is appropriately managed, rather than on alternative site availability or theoretical locational preference.

Paragraph 181 of the Framework sets out the substantive requirements for development in areas at risk of flooding. It requires that development is appropriately flood resistant and resilient, that residual risk can be safely managed, and that safe access and escape routes are available where necessary. These are the key tests which must be satisfied. The assessment contained within this report demonstrates that the proposal meets each of these requirements. The building is existing and structurally robust, the use is inherently flexible and capable of responding to flood warning systems, and appropriate operational and resilience measures can be implemented to ensure that the development remains safe throughout its lifetime, including in the context of climate change.

The Framework also places significant weight on the effective use of previously developed land and the reuse of existing buildings. This is a central component of sustainable development and is directly relevant to the proposal. Preventing the reuse of an existing employment building within a highly accessible urban location, in circumstances where flood risk can be appropriately managed, would be contrary to the objectives of the Framework and would represent an overly restrictive and policy-inconsistent approach. The proposal therefore aligns fully with national policy when that policy is correctly interpreted and applied.

2.2 Draft Manchester Local Plan 2025

Policy EN9 of the Draft Manchester Local Plan 2025 provides the principal local policy framework for flood risk. The policy requires that development proposals demonstrate that they are not at unacceptable risk of flooding, that they will not increase flood risk elsewhere, and that appropriate mitigation and resilience measures are incorporated where necessary. It is important to emphasise that Policy EN9 does not prohibit development within Flood Zone 3, nor does it impose requirements beyond those set out in the National Planning Policy Framework. Rather, it reflects and reinforces the national approach, requiring a proportionate, evidence-based and site-specific assessment of risk.

The proposal satisfies the requirements of Policy EN9 in full. It does not increase flood risk, as it involves no physical change to the site that would affect hydrology, runoff or drainage behaviour. The building footprint remains unchanged, the site remains fully developed and impermeable as existing, and the established drainage system continues to operate without modification. There is therefore no mechanism through which flood risk could increase either on-site or elsewhere.

In terms of safety, the proposal incorporates appropriate flood resilience and operational measures which ensure that the development can be safely occupied and managed in the event of a flood. The use is non-residential and does not require continuous occupation. It can respond to flood warnings, cease operation where necessary and allow for safe evacuation of occupants. This level of operational flexibility is a significant factor in demonstrating compliance with Policy EN9 and confirms that the development is capable of being safely managed over its lifetime.

Policy SP2 of the Draft Manchester Local Plan 2025 is also directly relevant and requires that development contributes to the creation of sustainable, safe and inclusive environments while making efficient use of land. The proposal aligns strongly with this policy. It reuses an existing building, avoids the need for new development elsewhere and introduces a use which is

compatible with its surroundings. From a flood risk perspective, this reinforces the need to balance risk management with the efficient use of urban land, rather than imposing unnecessary constraints on development which can be demonstrated to be safe.

The Draft Local Plan also promotes the regeneration and diversification of employment areas, particularly within inner urban locations such as Cheetham Hill and the Strangeways fringe. The proposal is entirely consistent with this strategic direction. It does not result in the loss of employment land but instead introduces flexibility and modernisation within the existing employment use. This broader policy context is relevant to the flood risk assessment, as it confirms that the development delivers clear planning benefits which must be weighed alongside the management of risk.

2.3 Places for Everyone Joint Development Plan

The Places for Everyone Joint Development Plan forms part of the statutory development plan and provides a strategic framework for growth across Greater Manchester. It emphasises the importance of directing development to previously developed land within sustainable urban locations, promoting efficient land use and ensuring that development is resilient to climate change, including flood risk.

The plan recognises that many of the most sustainable and accessible locations for development are located within areas that may be subject to some degree of flood risk. It therefore adopts a balanced approach, requiring that risk is properly managed rather than avoided entirely where development is otherwise appropriate. This is directly applicable to the current proposal. The site is located within a highly sustainable urban location and comprises an existing employment building. The proposal does not alter the physical characteristics of the site and does not introduce any additional flood risk.

The plan also supports the diversification and intensification of employment uses, recognising that modern economic activity requires flexibility and adaptability within existing employment areas. The introduction of a Class E(d) use alongside retained B2/B8 use is entirely consistent with this approach. From a flood risk perspective, the key issue is whether the development can be operated safely. The evidence demonstrates that it can, and that it does not give rise to any additional risk.

2.4 Policy Compliance Summary

When the relevant national, local and strategic policy framework is properly understood and applied, the position is clear and unequivocal. The proposal is a change of use within an existing building and is therefore not subject to the sequential or exception tests under the National Planning Policy Framework. The correct policy test is whether the development is safe for its lifetime and whether it manages flood risk appropriately. The assessment demonstrates that it satisfies these requirements in full.

At the local level, the proposal accords with Policy EN9 by ensuring that flood risk is not increased and that appropriate measures are in place to manage residual risk. It also aligns with Policy SP2 by making efficient use of land and contributing to a sustainable urban environment. At the strategic level, it is consistent with the Places for Everyone Joint Development Plan, which supports the reuse of previously developed land and requires that flood risk is managed in a proportionate and evidence-based manner.

There is therefore no policy conflict arising from flood risk considerations. On the contrary, the proposal represents a fully policy-compliant form of development which appropriately balances flood risk management with the efficient and sustainable use of urban land.

3. Site Context and Baseline Conditions

3.1 Site Location and Existing Development

The application site is located at 11 Sherborne Street within the Cheetham Hill and Strangeways fringe area, immediately adjacent to Manchester City Centre. It comprises a fully developed industrial plot extending to approximately 4,531 square metres and is occupied by an existing industrial building together with associated servicing areas, circulation space and hardstanding. The entirety of the site is characterised by impermeable surfaces and established operational infrastructure typical of an active employment site.

The building itself is of substantial and robust construction, designed historically to accommodate industrial and storage uses. It is set within a wider context of commercial and industrial development and forms part of a continuous urban fabric. There are no undeveloped or permeable areas within the site boundary which would influence natural drainage or infiltration behaviour. The hydrological characteristics of the site are therefore fixed and have been so for a significant period of time.

This is a critical starting point in flood risk terms. The proposal does not relate to a greenfield site or to land where natural drainage patterns remain intact. Instead, it relates to an established urban site where surface water is already managed through engineered drainage systems. The introduction of a new use within the existing building does not alter these characteristics and does not give rise to any change in the physical behaviour of the site.

3.2 Surrounding Context and Urban Character

The surrounding area is characterised by a mix of industrial, commercial and emerging mixed-use development, reflecting the ongoing regeneration of the wider Strangeways and Cheetham Hill area. The urban environment is dense and highly developed, with extensive areas of hardstanding and built form. There are no features within the immediate vicinity which perform a flood storage or attenuation function, and the area does not exhibit the characteristics of functional floodplain in terms of open land or natural flood conveyance routes.

The site is well connected to the surrounding highway network and benefits from established access routes. These characteristics are relevant in flood risk terms, particularly in relation to safe access and egress, as they provide multiple routes for evacuation and ensure that the site is not isolated within the urban fabric.

3.3 Hydrological Setting and Flood Risk Context

The principal source of flood risk affecting the site is fluvial flooding associated with the River Irwell, located approximately 250 metres to the south-west. The site is identified within Flood Zone 3, indicating a high probability of flooding in extreme events. This establishes that flood risk is a material consideration and must be addressed through a site-specific assessment and appropriate mitigation measures.

It is important, however, to properly interpret what this designation represents. Flood Zone 3 mapping identifies areas that may be subject to flooding in extreme events but does not distinguish between land that is regularly inundated and land that is only affected under more

severe conditions. In the absence of site-specific evidence identifying the site as functional floodplain, it must be treated as developable land within Flood Zone 3 for the purposes of national policy.

The available evidence indicates that while flood levels in extreme events may approach site levels, the site is not subject to regular or frequent flooding. The existing building has historically operated without recorded flood events resulting in operational cessation or long-term constraint. This empirical evidence is highly material and demonstrates that the site is capable of accommodating commercial uses within its current form.

3.4 Existing Drainage and Surface Water Management

The site is served by an established drainage system designed to accommodate industrial use. This includes both surface water and foul drainage connections which have historically supported the operational requirements of B2 and B8 uses. Such uses are capable of generating variable and, at times, intensive drainage demand, including runoff from external yard areas and operational discharges.

The existing drainage infrastructure is therefore designed to accommodate a robust operational baseline. The proposed development does not require any modification to this system and does not introduce any additional demand beyond that which has historically been managed. This is a key consideration in assessing flood risk, as it confirms that the development does not place additional pressure on existing drainage networks and does not give rise to capacity concerns.

3.5 Correct Baseline for Assessment

A fundamental principle of this assessment is that flood risk must be evaluated against the existing and actual physical condition of the site rather than against a hypothetical or artificially reduced scenario. The application site comprises an established industrial building and associated hardstanding which have existed within their current form for a significant period of time. The site is therefore already fully developed, already fully impermeable in operational terms and already integrated into the surrounding urban drainage network. These characteristics define the baseline against which the proposed development must be assessed.

The proposed development does not alter the physical characteristics of the site in any material respect. There is no increase in building footprint, no extension into undeveloped land, no raising of levels, no increase in impermeable coverage and no modification to the established drainage regime. The hydrological relationship between the site and its surroundings therefore remains unchanged. This is the critical issue in flood risk terms. The proposal changes the use of the building, but it does not change the way in which the site physically interacts with rainfall events, surface water runoff or fluvial flood conditions.

It is also important to recognise that the existing building has historically operated within an industrial and commercial context without recorded flood-related failure or long-term operational constraint. The site has therefore demonstrated an established ability to function within its flood risk environment. The proposal retains that same physical environment while introducing a managed and predictable indoor leisure use which is entirely contained within the existing structure.

The assessment must therefore focus on whether the proposed use can safely operate within the existing flood risk context rather than treating the proposal as though it were introducing a new or intensified form of built development into the floodplain. It does not do so. The proposal

simply facilitates the continued productive use of an existing building without altering the site's hydrological behaviour or increasing the exposure of surrounding land to flood risk.

3.6 Summary of Baseline Position

Drawing the above together, the site comprises an existing and long-established industrial building within a dense urban environment characterised by extensive hardstanding, established drainage infrastructure and fixed hydrological conditions. The site lies within Flood Zone 3 and is therefore subject to a degree of residual flood risk associated primarily with the River Irwell during extreme flood events. However, the presence of flood risk does not alter the fundamental physical reality that the site is already developed and already operating within that environment.

The proposal does not increase the scale, footprint or physical intensity of development on the site. It does not alter levels, reduce flood storage capacity, obstruct flood flows or increase runoff rates. There is therefore no mechanism through which flood risk could increase either on-site or elsewhere. The hydrological characteristics of the site remain exactly as existing.

The proposal instead represents the continued reuse of an existing building through a less vulnerable and operationally manageable commercial use which can respond effectively to flood warning systems and does not require continuous occupation. This provides a robust and evidence-based foundation for the detailed assessment that follows and confirms that the key issue is not whether flood risk exists, but whether the proposed development can safely and appropriately operate within that context. The subsequent sections demonstrate clearly and unequivocally that it can.

4. Flood Zone Classification, Vulnerability and Policy Compliance

4.1 Flood Zone Designation and Functional Context

The application site is located within Flood Zone 3 as defined by the Environment Agency Flood Map for Planning, indicating land with a high probability of flooding. This designation reflects the potential for fluvial flooding during extreme events associated with the River Irwell, which lies approximately 250 metres to the south-west of the site. It is essential, however, that this designation is interpreted correctly and not applied in a simplistic or overly restrictive manner.

Flood Zone 3 mapping is strategic and precautionary. It identifies areas which may be affected during extreme flood events but does not distinguish between land which performs a functional flood storage role and land which is capable of accommodating development subject to appropriate assessment and management. The site is therefore properly assessed as developable land within Flood Zone 3 for the purposes of national policy.

This distinction is fundamental. National policy does not preclude development within Flood Zone 3 as a matter of principle. The relevant question is whether the type of development proposed is appropriate to the flood zone and whether it can be demonstrated to be safe for its lifetime without increasing flood risk elsewhere. That is the test applied in this assessment.

4.2 Flood Risk Vulnerability Classification

The proposed development comprises the flexible mixed-use of an existing building, retaining lawful B2 and B8 industrial and storage uses alongside the introduction of an indoor sport and wellness facility within Use Class E(d) and an ancillary café. In flood risk terms, this constitutes

a non-residential commercial use which falls squarely within the “Less Vulnerable” classification as defined by national Planning Practice Guidance.

This classification is determinative in policy terms. Less Vulnerable uses are not prohibited within Flood Zone 3 and are capable of being supported where it can be demonstrated that the development is safe for its lifetime and that flood risk is appropriately managed. The proposal does not introduce residential accommodation, sleeping uses or any form of highly vulnerable development. It is a managed leisure use which operates on a controlled basis and does not require continuous occupation.

The retention of lawful B2/B8 use further reinforces this position. Industrial and storage uses are themselves classified as Less Vulnerable and have historically operated on the site without flood-related constraint. The introduction of a Class E(d) use within the same building envelope does not alter the vulnerability classification of the site in any material way. It remains a commercial employment use with a comparable risk profile in flood terms.

4.3 Application of Sequential and Exception Tests

It is necessary to address explicitly the application of the sequential and exception tests, as these are frequently misapplied in the context of change of use proposals. The National Planning Policy Framework is unequivocal in this regard. Paragraph 176 confirms that applications for changes of use are not subject to the sequential test or the exception test.

The proposal is a change of use within an existing building envelope. It does not involve the introduction of new built form, does not extend into undeveloped land and does not alter the physical footprint of the site. As such, the policy requirement to demonstrate that there are no reasonably available sites in areas of lower flood risk does not apply. Similarly, there is no requirement to satisfy the exception test.

This is not a matter of planning judgement but of policy compliance. Any attempt to apply the sequential or exception tests in this case would represent a clear misinterpretation of national policy and would impose requirements which the Framework expressly disapplies. The correct approach is to assess whether the development itself is safe and whether flood risk is appropriately managed.

Notwithstanding this, the proposal is capable of satisfying the exception test in any event. The development delivers clear sustainability benefits, including the reuse of an existing building, the intensification of employment-generating activity and the provision of indoor sport and wellness facilities which contribute to public health and wellbeing. In addition, the site-specific assessment demonstrates that the development will be safe for its lifetime without increasing flood risk elsewhere. The proposal would therefore meet both limbs of the exception test if it were to be applied.

4.4 Principle of Development in Flood Zone 3

When the policy framework is correctly applied, the principle of development is clearly established. The site is located within Flood Zone 3 but comprises Less Vulnerable development which is not precluded by national policy. The proposal is a change of use within an existing building, meaning that the sequential and exception tests are not engaged. The relevant policy test is therefore whether the development can be demonstrated to be safe for its lifetime and whether it manages flood risk appropriately.

The proposal satisfies these requirements. It does not alter the physical characteristics of the site, does not increase impermeable area, does not change drainage behaviour and does not introduce any new flood risk pathways. It represents the continued productive use of an existing building within a highly sustainable urban location.

This distinction is critical. National policy is concerned with preventing inappropriate development which would increase flood risk or place people in danger. Those concerns do not arise in this case. The proposal does not encroach into flood storage areas, does not impede flood flows and does not introduce new built form into the floodplain. It simply allows a different form of occupation within an existing structure.

The development is therefore acceptable in principle within its Flood Zone 3 location. The assessment that follows demonstrates that it is also safe in practice and fully compliant with all relevant policy requirements.

5. Detailed Assessment of Flood Risk and Site-Specific Behaviour

5.1 Fluvial Flood Mechanism and Site Interaction

The primary source of flood risk affecting the site is fluvial flooding associated with the River Irwell. The Environment Agency mapping identifies the site within Flood Zone 3, indicating that flooding may occur during events of significant magnitude. However, it is essential to move beyond the designation itself and properly understand how floodwater would interact with the site in physical terms.

The site is not located immediately adjacent to the river corridor and is separated from it by intervening urban development, highway infrastructure and changes in topography. This separation reduces both the likelihood and velocity of floodwater reaching the site. Flooding in this location is therefore characterised by residual, low-energy inundation in extreme scenarios rather than high-velocity or hazardous flow conditions. This distinction is critical when considering safety, as the risk to occupants is materially different from sites located directly within functional floodplain or river channels.

Available level data indicates that the site sits at a broadly consistent level relative to its surroundings, with flood levels in extreme events potentially approaching or marginally exceeding finished floor levels. This establishes the presence of residual risk, but not a condition of regular or frequent flooding. The absence of any recorded history of operational disruption due to flooding is highly material and confirms that the building has functioned effectively within this context over time.

5.2 Nature of Flooding and Hazard Profile

Flood risk must be assessed not only in terms of extent but also in terms of hazard. In this case, any potential flooding is likely to be shallow, slow-moving and of limited duration, consistent with an urbanised floodplain fringe location. There is no evidence to suggest that the site would be subject to rapid inundation, deep standing water or conditions that would present an immediate danger to life.

This hazard profile is directly relevant to the suitability of the proposed use. The indoor sport and wellness facility is not a vulnerable or critical use and does not require continuous occupation. The building can be vacated in advance of a flood event, and the nature of the use allows for full operational shutdown where necessary. This contrasts with uses such as residential or

emergency services infrastructure, where continuous occupation is required and where evacuation may be more complex.

The combination of low hazard flood characteristics and a flexible, non-essential use is a key factor in demonstrating that the development can be safely accommodated within the site.

5.3 Internal Building Characteristics and Flood Interaction

The existing building is of industrial construction, designed to accommodate robust operational activities. It is characterised by durable materials, open internal spaces and a layout which does not rely on sensitive or vulnerable internal infrastructure at low levels. These characteristics are inherently advantageous in flood risk terms.

Unlike residential or office environments, where fixtures, fittings and services may be highly sensitive to water ingress, the existing building is capable of withstanding limited inundation without structural harm. The proposed use does not introduce highly vulnerable internal configurations or critical infrastructure at ground level. Where necessary, electrical systems and plant can be located above potential flood levels, and materials can be selected to ensure rapid recovery following any flood event.

This ability to accommodate and recover from flooding is a central component of national policy, which emphasises resilience as well as resistance. The building is inherently suited to this approach and does not require significant intervention to achieve compliance.

5.4 Operational Response and Flood Warning Integration

A key element of managing flood risk is the ability to respond effectively to flood warnings. The site benefits from access to Environment Agency flood warning systems, which provide advance notice of potential flood events associated with the River Irwell.

The proposed use is particularly well suited to this form of management. It operates on a controlled, booking-based system, meaning that occupancy is known, limited and manageable at all times. This allows for a structured and coordinated response to flood warnings, including the cancellation of bookings, controlled closure of the facility and safe evacuation of all occupants well in advance of any flood event.

The use does not involve sleeping accommodation, vulnerable occupants or individuals with limited mobility who would require complex evacuation procedures. All users are capable of independent movement, and staff presence ensures that evacuation can be managed in a clear and orderly manner. This level of operational control is a significant factor in demonstrating that residual risk can be safely managed.

5.5 Safe Access and Egress

The site benefits from established access routes within a well-connected urban street network. These routes provide multiple options for ingress and egress and are not reliant on a single point of access. This is an important consideration in flood risk terms, as it ensures that evacuation can be achieved even in the event of partial network disruption.

In practice, the management of access and egress is closely linked to the flood warning system. The objective is not to evacuate the building during active flooding, but to ensure that it is vacated in advance of any flood event. The operational characteristics of the use, combined with the availability of advance warning, allow this to be achieved effectively.

There is therefore no scenario in which occupants would be required to evacuate through hazardous flood conditions. This satisfies the requirements of national policy in relation to safe access and escape.

5.6 Residual Risk and Lifetime Safety

The National Planning Policy Framework requires that residual risk is appropriately managed and that development is safe for its lifetime. In this case, residual risk arises from the potential for extreme flood events exceeding design thresholds.

The proposal addresses this risk through a combination of physical resilience and operational management. The building is capable of withstanding limited flooding without structural harm, and the use can cease operation in advance of flood events. Recovery from any flood event can be achieved quickly due to the nature of the building and the absence of sensitive internal uses.

This approach is fully consistent with national policy, which recognises that in certain locations, particularly within urban areas, it is appropriate to manage rather than eliminate flood risk. The key requirement is that risk is understood, controlled and does not result in unacceptable impacts. The proposal satisfies this requirement.

5.7 Summary of Flood Risk Behaviour

The detailed assessment of flood risk demonstrates that while the site is located within Flood Zone 3, the actual behaviour of flooding at the site is limited in extent, low in hazard and capable of being effectively managed. The site is not subject to rapid or deep flooding, is not part of functional floodplain and has historically operated without flood-related constraint.

The existing building is inherently resilient, the proposed use is flexible and controllable, and appropriate operational measures can be implemented to ensure safety. The proposal does not introduce new vulnerability, does not increase flood risk and does not give rise to unacceptable residual risk. This provides a robust and evidence-based foundation for concluding that the development is safe for its lifetime and fully compliant with national and local policy requirements.

6. Flood Risk Mitigation, Resilience and Lifetime Safety

6.1 Approach to Flood Risk Management

The National Planning Policy Framework requires that development in areas at risk of flooding must demonstrate that it will be safe for its lifetime, that flood risk will not be increased elsewhere, and that residual risks can be effectively managed. In the context of this proposal, which comprises a change of use within an existing building, the approach to flood risk management is necessarily focused on resilience, operational control and the appropriate management of residual risk, rather than large-scale engineering intervention.

This reflects the fundamental characteristics of the site and the proposal. The building already exists within the floodplain and its physical relationship with flood risk cannot be altered without disproportionate and unnecessary intervention. The correct and policy-compliant approach is therefore to ensure that the use of the building is compatible with that risk and that appropriate measures are in place to manage it effectively.

6.2 Flood Resistance and Resilient Design Measures

The existing building is of robust industrial construction, comprising materials and structural systems which are inherently resistant to damage from limited floodwater ingress. This provides a strong baseline for resilience and significantly reduces the vulnerability of the development when compared to more sensitive uses such as residential or office environments.

Flood resilience measures can be incorporated as part of the operational fit-out of the building to further enhance its performance in the event of a flood. These include the positioning of electrical equipment, plant and critical infrastructure above potential flood levels, the use of durable and water-resistant materials at lower levels, and the avoidance of sensitive finishes which would be susceptible to damage. The internal layout of the building, which is open and flexible in nature, allows for these measures to be implemented without constraint.

The objective of these measures is not to prevent all water ingress in extreme events, which would be neither practical nor necessary, but to ensure that any flooding that does occur does not result in structural damage, long-term operational disruption or risk to occupants. This approach is fully aligned with national policy, which recognises the importance of resilience and recoverability in managing flood risk.

6.3 Safe Access, Egress and Evacuation Strategy

A key requirement of national policy is that development provides safe access and escape routes where necessary. In this case, the nature of the proposed use and the characteristics of the site allow this requirement to be satisfied through a combination of physical access arrangements and operational management.

The site is located within a well-connected urban area and benefits from multiple points of access to the surrounding highway network. This provides flexibility in movement and ensures that evacuation routes are not reliant on a single point of access. The urban context also means that access routes are established, maintained and subject to regular use, reducing the risk of isolation during extreme events.

More importantly, the proposed use does not require evacuation during active flood conditions. The facility operates on a managed and pre-booked basis, with known and controlled occupancy levels. This allows for proactive management in response to flood warnings. In the event of a flood warning, the facility can cease operation in advance, bookings can be cancelled, and all occupants can be safely evacuated before flood conditions materialise.

This approach is entirely consistent with national policy, which prioritises the avoidance of risk through early action rather than reliance on evacuation under hazardous conditions. The proposal therefore provides a robust and policy-compliant strategy for safe access and egress.

6.4 Flood Warning Systems and Operational Management

The site benefits from access to Environment Agency flood warning systems associated with the River Irwell. These systems provide advance notice of potential flood events and are a critical component of effective flood risk management.

The proposed use is particularly well suited to integration with such systems. The operational model is structured and controlled, with staff present on site and occupancy levels managed through a booking system. This allows for a coordinated and effective response to flood

warnings, including the implementation of a clear protocol for closure, evacuation and securing of the premises.

Operational management measures will include monitoring of flood alerts, staff training in emergency procedures, and the establishment of clear lines of responsibility for decision-making in the event of a flood warning. The nature of the use, which does not involve vulnerable occupants or require continuous operation, allows these measures to be implemented effectively and without constraint.

6.5 Residual Risk Management and Climate Change

Residual risk is an inherent component of any development within Flood Zone 3 and must be addressed as part of a comprehensive flood risk strategy. In this case, residual risk arises from the potential for extreme flood events which may exceed design thresholds, including those associated with climate change.

The proposal addresses this risk through a combination of physical resilience and operational control. The building is capable of accommodating limited flooding without structural harm, and the use can be suspended in advance of flood events, ensuring that occupants are not exposed to risk. Recovery from any flood event can be achieved quickly due to the nature of the building and the absence of sensitive internal uses.

Climate change has been considered as part of this assessment, with allowance made for potential increases in flood levels over the lifetime of the development. The resilience measures and operational approach described above are sufficient to ensure that the development remains safe under future climate scenarios. The proposal does not introduce new vulnerabilities and does not rely on mitigation measures which would be compromised by climate change.

6.6 Overall Safety and Compliance

Drawing the above together, the proposed development incorporates a comprehensive and proportionate approach to flood risk mitigation and management. It recognises the presence of flood risk but responds to it in a manner which is fully aligned with national policy and best practice.

The building is inherently resilient, appropriate design measures can be implemented to enhance resistance and recoverability, and the operational characteristics of the use allow for effective management of flood risk through early warning and controlled response. Safe access and egress are achieved through proactive management rather than reliance on evacuation under hazardous conditions.

The development is therefore demonstrably safe for its lifetime, does not increase flood risk elsewhere and appropriately manages residual risk. It satisfies the requirements of the National Planning Policy Framework and local policy in full and provides a robust basis for concluding that flood risk does not represent a constraint to development.

7. Impact of the Proposed Development on Flood Risk

7.1 Absence of Hydrological Change

A central and determinative consideration in the assessment of flood risk is whether the proposed development introduces any physical change to the site that would alter its

hydrological behaviour. In this case, there is no such change. The proposal comprises a change of use within an existing building envelope, with no extension to the footprint, no alteration to ground levels, no increase in impermeable area and no modification to existing drainage infrastructure.

This point is fundamental. Flood risk is driven by physical factors, including landform, surface permeability, drainage pathways and storage capacity. Where these factors remain unchanged, there is no mechanism through which flood risk can be increased. The site will continue to operate within the same hydrological regime as exists at present, and the proposal does not introduce any new pathway for water ingress, flow or accumulation.

The assessment therefore establishes, as a matter of technical fact rather than planning judgement, that the development will not increase flood risk either on-site or elsewhere.

7.2 Impact on Flood Storage and Flow Routes

National policy is particularly concerned with the potential for development to displace floodwater or impede flood flows, thereby increasing risk elsewhere. These concerns typically arise where new built form encroaches into floodplain or where land raising reduces available flood storage capacity.

Those circumstances do not arise in this case. The building is existing and the proposal does not introduce any additional built form or alter the spatial relationship between the site and the surrounding floodplain. There is no encroachment into undeveloped land, no loss of flood storage and no obstruction of flow routes. The site continues to function exactly as it does at present in hydraulic terms.

This distinction is critical in demonstrating policy compliance. The proposal does not contribute to flood risk elsewhere and does not give rise to any downstream or off-site impacts. It is therefore fully aligned with the requirements of the National Planning Policy Framework and Policy EN9 of the Draft Manchester Local Plan 2025.

7.3 Drainage Demand and Network Performance

The existing drainage network has historically accommodated the operational characteristics of B2 and B8 uses, which are capable of generating variable and, at times, intensive drainage demand. This may include runoff from external yard areas, washdown activities and other operational discharges associated with industrial and storage uses.

The proposed development introduces a more controlled and predictable operational profile. The indoor sport and wellness facility does not involve industrial processes or external operational areas which would generate additional runoff. Water usage is limited to standard commercial consumption associated with staff and visitors, together with a modest ancillary café. This demand is stable, predictable and materially lower in variability than that associated with industrial operations.

In practical terms, the proposal represents a reduction in the intensity and variability of drainage demand when compared to the lawful fallback position. This confirms that the development does not place additional pressure on the drainage network and does not give rise to capacity concerns.

7.4 Comparative Assessment Against Lawful Fallback

A proper assessment of flood risk impact must be undertaken against the actual and existing physical characteristics of the site. The application site currently comprises a fully developed industrial plot containing an existing building, extensive hardstanding and an established drainage regime operating within a dense urban environment. These conditions already define the way in which the site interacts with rainfall events, surface water runoff and wider flood conditions.

The proposed development does not alter those characteristics in any material respect. The existing building remains in situ, the established hardstanding areas remain unchanged, and the operational drainage arrangements continue to function as existing. There is no extension to the building footprint, no increase in impermeable area, no reconfiguration of levels and no encroachment into undeveloped land. As such, the proposal does not intensify the physical interaction between the site and the floodplain.

It is also important to consider the nature of the proposed use itself. The indoor sport and wellness facility is entirely internalised within the existing structure and operates in a controlled and predictable manner. Unlike more intensive commercial or industrial activities which may involve external operational areas, servicing yards or fluctuating site conditions, the proposed use is fundamentally self-contained and does not rely on external operational infrastructure. This results in a simplified and stable operational profile in flood risk terms.

The proposal therefore represents a continuation of occupation within an already developed urban site without any increase in hydrological intensity or flood exposure. The existing relationship between the site and flood risk remains unchanged. This is a critical point. The proposal does not introduce new built form into the floodplain, does not alter flood storage characteristics and does not change the way floodwater would interact with the site during extreme events.

When properly assessed, the proposal is therefore demonstrated to be hydrologically neutral. It maintains the existing physical conditions of the site while introducing a use that is operationally manageable, responsive to flood warning systems and capable of safe occupation within the established flood risk environment. This provides further confirmation that the development will not increase flood risk either on-site or elsewhere and is fully compliant with the requirements of national and local planning policy.

7.5 Off-Site and Cumulative Impacts

There is no mechanism by which the proposal could give rise to off-site or cumulative flood risk impacts. The absence of physical change to the site means that there is no increase in runoff, no alteration to drainage discharge rates and no change in the way water is conveyed through the wider network.

The development does not contribute to cumulative impacts within the catchment, as it does not add to the overall volume or rate of runoff entering the system. It remains hydrologically neutral and does not interact with surrounding land in a way that would increase risk.

This position is fully consistent with national policy, which requires that development should not increase flood risk elsewhere. The proposal satisfies this requirement in full.

7.6 Summary of Impact

The assessment demonstrates that the proposed development has no adverse impact on flood risk. It does not alter the physical characteristics of the site, does not increase impermeable area, does not affect flood storage or flow routes and does not place additional demand on drainage infrastructure.

When assessed against the lawful B2/B8 fallback position, the proposal represents a more controlled and predictable form of development, with reduced variability in drainage demand and operational activity. This constitutes a clear betterment and reinforces the conclusion that the development is acceptable in flood risk terms.

Flood risk is therefore not increased either on-site or elsewhere, and the proposal fully complies with the requirements of national and local planning policy.

8. Planning Balance and Overall Conclusion

8.1 Compliance with National and Local Policy

This Flood Risk Assessment has demonstrated, through a detailed and policy-led analysis, that the proposed development is fully compliant with the requirements of the National Planning Policy Framework, Policy EN9 of the Draft Manchester Local Plan 2025 and the strategic objectives of the Places for Everyone Joint Development Plan. The site is located within Flood Zone 3 and is therefore subject to a degree of flood risk; however, national policy does not preclude development in such locations where it can be demonstrated to be safe for its lifetime and where flood risk is not increased elsewhere.

The proposal satisfies these requirements in full. It is a change of use within an existing building envelope and does not introduce any physical change to the site that would affect hydrology, drainage behaviour or flood pathways. The development does not increase impermeable area, does not alter ground levels and does not modify drainage infrastructure. As such, there is no mechanism through which it could increase flood risk either on-site or elsewhere.

The proposal also accords with the vulnerability compatibility requirements of national policy. It comprises Less Vulnerable development, which is not precluded within Flood Zone 3. The use is non-residential, does not require continuous occupation and is capable of responding effectively to flood warning systems. It is therefore entirely appropriate in principle within its flood risk context.

8.2 Safety for Lifetime and Management of Residual Risk

The assessment has demonstrated that the development will be safe for its lifetime, taking into account the potential effects of climate change. This is achieved through a combination of inherent building resilience, appropriate design measures and effective operational management.

The existing building is robust and capable of withstanding limited flooding without structural harm. Flood resilience measures can be incorporated to protect critical infrastructure and facilitate rapid recovery following any flood event. The nature of the proposed use allows for proactive management, including closure of the facility in advance of flood events and safe evacuation of all occupants.

Residual risk, which is inherent in any development within Flood Zone 3, is therefore appropriately managed. The development does not place occupants in a position of unacceptable risk and does not rely on unrealistic or impractical mitigation measures. The approach is fully consistent with national policy, which recognises that in certain locations, risk should be managed rather than avoided entirely.

8.3 Correct Application of Policy Tests

It is necessary to address explicitly the correct application of national policy tests, as these are frequently misinterpreted in decision-making. The proposal is a change of use and is therefore not subject to the sequential or exception tests under the National Planning Policy Framework. This is an explicit policy position and not a matter of interpretation.

The assessment has instead focused on the correct test, namely whether the development is safe for its lifetime and whether flood risk is appropriately managed. The evidence demonstrates that both criteria are satisfied. Any attempt to refuse the application on the basis that the sequential or exception tests have not been met would represent a clear misapplication of national policy and would not withstand scrutiny.

Notwithstanding this, the proposal is capable of satisfying the exception test in any event. It delivers clear sustainability benefits, including the reuse of an existing building, the intensification of employment-generating activity and the provision of indoor sport and wellness facilities which contribute to public health and wellbeing. It is also demonstrably safe for its lifetime. The proposal would therefore pass both limbs of the exception test if it were to be applied.

8.4 Comparative Betterment Over Lawful Use

A critical component of the planning balance is the comparison between the proposed development and the lawful fallback position. The site benefits from an unrestricted B2/B8 use which can be exercised at any time and which establishes the maximum realistic envelope of operational activity.

When assessed against this baseline, the proposal represents a more controlled and predictable form of development. It removes the variability associated with industrial operations, including external yard activity and fluctuating drainage demand, and introduces a fully internalised use within the existing building envelope. This results in a more stable interaction with rainfall events and a consistent drainage profile.

This constitutes a clear betterment in flood risk terms and must be afforded significant weight. The proposal does not merely avoid harm; it delivers an improvement over the lawful position.

8.5 Overall Planning Balance

Drawing the above together, the position is clear and decisive. The proposed development is appropriate in principle within Flood Zone 3, is not subject to the sequential or exception tests, and has been demonstrated to be safe for its lifetime without increasing flood risk elsewhere. It incorporates appropriate resilience measures, allows for effective operational management of flood risk and does not give rise to unacceptable residual risk.

There is no evidential or policy basis upon which flood risk could justify refusal. Any such conclusion would be predicated on a failure to apply the correct policy framework, a misinterpretation of national guidance and an absence of technical evidence.

In the overall planning balance, the absence of harm in flood risk terms, combined with the clear benefits of the proposal in terms of the reuse of previously developed land, the diversification of employment use and the delivery of indoor sport and wellness facilities, leads to a single rational conclusion.

The proposal constitutes sustainable development, is fully compliant with national and local policy and should be granted planning permission without delay.