



Sequential and Exception Test

Ryebank, Chorlton
Full Application

On behalf of Step Places, Southway Housing Trust and
Manchester Metropolitan University
May 2026

CONTENTS

1	INTRODUCTION.....	1
2	PLANNING POLICY CONTEXT & STRATEGIC FLOOD RISK ASSESSMENT.....	2
3	RYEBANK FLOOD RISK.....	8
4	METHODOLOGY	11
5	SEQUENTIAL TEST	17
6	EXCEPTION TEST	29
7	SUMMARY AND CONCLUSIONS	32

APPENDICES

APPENDIX 1 SITE LOCATION PLAN

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1 INTRODUCTION

- 1.1 Asteer Planning LLP ("Asteer Planning") has been instructed by Step Places, Southway Housing Trust and Manchester Metropolitan University ("the Applicants") to prepare a flood risk sequential and exception test report in relation to Ryebank, Chorlton, Greater Manchester ("the Site").
- 1.2 The Site is 4.61 hectares, the majority of which is situated within the administrative area of Manchester City Council (MCC). A very small area (0.0156 hectares / 156.5 sqm) falls within the boundary of Trafford Metropolitan Borough Council (TMBC). The Site Location Plan is shown at **Appendix 1**. The full planning application has been submitted for the following proposal:

"Erection of a residential development comprising 120 dwellings (including a mix of housing types and tenures) together with open spaces, landscaping, sustainable drainage features, cycleways and pedestrian footways, vehicular accesses and highways, parking provision and other associated works."

- 1.3 The remainder of this Report provides the following information:
- **Section 2 – Planning Policy Context** – An overview of the local and national planning policy position in relation to flood risk;
 - **Section 3 – Site Conditions: Baseline Flooding Position** – This Section summarises the Flood Risk Assessment for the Site which has been prepared by Renaissance;
 - **Section 4 – Methodology** – This Section sets out the methodology and scope of the sequential test;
 - **Section 5 – Sequential Test** – This Section undertakes a sequential test of the Site reviewing whether any suitable alternative sites can accommodate the proposed development;
 - **Section 6 – Exception Test** – An assessment of the proposals in light of the exception test criteria is undertaken, analysing the sustainability benefits of the proposals and whether future residents will be protected from flood risk for the lifetime of the development;
 - **Section 7 – Summary and Conclusions** – Overview of the report and summary of Findings.

2 PLANNING POLICY CONTEXT & STRATEGIC FLOOD RISK ASSESSMENT

- 2.1 This Section sets out a review of national and local planning policy in relation to flood risk and specifically sequential tests and exception tests. It also provides a summary of the Strategic Flood Risk Assessments (SFRAs) that have been prepared.

National Planning Policy

- 2.2 The National Planning Policy Framework ("NPPF"), last published in December 2024 and amended February 2025, sets out the Government's policy of avoiding inappropriate development in areas at risk of flooding, or where necessary, the development should be made safe for its lifetime without increasing flood risk elsewhere. Strategic policies should manage flood risk from all sources of flooding and plans should apply a sequential, risk based approach to the location of development.
- 2.3 National Planning Practice Guidance ("NPPG") on Flood Risk and Coastal Change (2014) sets out the main steps to be followed to ensure that if there are better sites in terms of flood risk, or a proposed development cannot be made safe, it should not be permitted. This section of the NPPG was last updated on 17th September 2025.

Sequential Test

- 2.4 Paragraphs 170 - 182 of the NPPF deal with 'Planning and Flood Risk'. More specifically, Paragraphs 170 - 176 set out that a sequential approach should be taken to the location of development in plan making and where relevant, applied to planning applications. Specifically:

- Paragraph 171 requires that '*Strategic policies should be informed by a strategic flood risk assessment*';
- Paragraph 172 states that '*All plans should apply a sequential, risk-based approach to the location of development – taking into account all sources of flood risk and the current and future impacts of climate change*';
- Paragraph 173 states that '*A sequential risk-based approach should also be taken to individual applications in areas known to be at risk now or in future from any form of flooding*'

- 2.5 Paragraphs 174 and 175 state:

"174. Within this context the aim of the sequential test is to steer new development to areas with the lowest risk of flooding from any source. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower risk of flooding. The strategic flood risk assessment will provide the basis for applying this test.

175. The sequential test should be used in areas known to be at risk now or in the future from any form of flooding, except in situations where a site-specific flood risk assessment demonstrates that no built development within the site boundary, including access or escape routes, land raising or other potentially vulnerable elements, would be located on an area that would be at risk of flooding from any source, now and in the future (having regard to potential changes in flood risk)"

Exception Test

2.6 NPPF paragraphs 178, 179, and 180 set out the approach to the exception test:

"178. The application of the exception test should be informed by a strategic or site-specific flood risk assessment, depending on whether it is being applied during plan production or at the application stage. To pass the exception test it should be demonstrated that:

a) the development would provide wider sustainability benefits to the community that outweigh the flood risk; and

b) the development will be safe for its lifetime taking account of the vulnerability of its users, without increasing flood risk elsewhere, and, where possible, will reduce flood risk overall."

"179. Both elements of the exception test should be satisfied for development to be allocated or permitted."

"180. Where planning applications come forward on sites allocated in the development plan through the sequential test, applicants need not apply the sequential test again. However, the exception test may need to be reapplied if relevant aspects of the proposal had not been considered when the test was applied at the plan-making stage, or if more recent information about existing or potential flood risk should be taken into account."

Local Planning Policy

Manchester City Council

Manchester Core Strategy (2012) – as amended by the 2024 Addendum

- 2.7 The Manchester Core Strategy forms part of the statutory Development Plan for Manchester.

- 2.8 Policy EN 14 Flood Risk states that:

“In line with the risk-based sequential approach contained within PPS25, development should be directed away from sites at the greatest risk of flooding, and towards sites with little or no risk of flooding; this should take account of all sources of flooding identified in the Manchester-Salford-Trafford Strategic Flood Risk Assessment (SFRA)”

Trafford Local Plan – Core Strategy (2012)

- 2.9 The Trafford Local Core Strategy forms part of the statutory Development Plan for Trafford.

- 2.10 Policy L5: Climate Change – L5.16 states that:

“The Council will seek to control development in areas at risk of flooding, having regard to the vulnerability of the proposed use and the level of risk in the specific location. This will involve a sequential approach to determining the suitability of land for development and application of the exception test, as outlined in national planning policy, where necessary.”

- 2.11 Policy L5: Climate Change – L5.17 states that:

“Developers will be required to demonstrate, where necessary by an appropriate Flood Risk Assessment (FRA) at the planning application stage, that account has been taken of flood risk from all sources (including rivers, canals, sewers, surface water run-off and groundwater) as identified in the Council’s Strategic Flood Risk Assessment and/or shown on the Key Diagram, and that the proposed development incorporates flood mitigation and management measures appropriate to the use and location.”

- 2.12 Policy L5: Climate Change – L5.18 states that:

“Developers will be required to improve water efficiency and reduce surface water run-off through the use of appropriate measures such as rain water harvesting, water recycling and other Sustainable Drainage Systems (SuDS) appropriate to the various parts of the Borough, as mapped in the Council’s Strategic Flood Risk Assessment.”

Places for Everyone Joint Development Plan Document (2024)

Policy JP-S4: Flood Risk and the Water Environment states:

“An integrated catchment-based approach will be taken to protect the quantity and quality of water bodies with reference to the North West River Basin Management Plan and managing flood risk, by:

- 1. Returning rivers to a more natural state, where practicable;*
- 2. Working with natural processes and adopting a natural flood management approach to slow the speed of water drainage and intercept water pollutants;*
- 3. Locating and designing development so as to minimise the impacts of current and future flood risk, including retrofitting or relocating existing developments, infrastructure and places to increase resilience to flooding;*
- 4. Expecting developments to manage surface water run-off through sustainable drainage systems and as close to source as possible. Development should achieve greenfield run-off rates unless it is demonstrated to be impracticable. District local plans should consider setting more detailed surface water drainage policies to reflect local circumstances, including alternative surface water discharge rates, such as in areas with critical drainage issues;*
- 5. Ensuring that sustainable drainage systems:*
 - i. Are designed to provide multifunctional benefits wherever possible, including for water quality, nature conservation and recreation;*
 - ii. Avoid adverse impacts on water quality and any possibility of discharging hazardous substances to ground;*
 - iii. Are delivered in a holistic and integrated manner, including on larger sites split into different phases; and*
 - iv. Are managed and maintained appropriately to ensure their proper functioning over the lifetime of the development.*
- 6. Securing the remediation of contaminated land and the careful design of developments to minimise the potential for urban diffuse pollution to affect the water environment...”*

Strategic Flood Risk Assessments

Manchester City, Salford City and Trafford Councils Level 2 Hybrid SFRA – LEVEL 1 SFRA 2010

- 2.13 The Level 1 SFRA provides a spatial assessment of flood risk within key urban areas, which expands on the detail included in the Association of Greater Manchester Authorities (AGMA) sub-regional SFRA, including Manchester Salford and Trafford.
- 2.14 The Level 1 SFRA recommended that the following issues should be assessed within the Level 2 SFRA:
- Fluvial flood risk at strategic development sites along the Irwell, Irk, Medlock, Grey Irwell, Corn Brook and the Manchester Ship Canal (MSC).
 - Breach of the defences on the Irwell at Kersal and Lower Broughton and on the Mersey at Carrington.
 - Overtopping and breach of embankments along the Rochdale, Ashton and Bridgewater Canals.
 - Detailed surface water analysis should be undertaken across the authorities to assess flood risk from this source.

Manchester City, Salford City and Trafford Councils Level 2 Hybrid SFRA – LEVEL 2 SFRA 2011

- 2.15 The Level 2 SFRA provided a detailed understanding of flood risk across Manchester, Salford and Trafford from all sources which includes flood risk from rivers, canals and surface water and sewers and the interactions between different sources of flood risk. The Level 1 SFRA considered the risk of groundwater flooding. However, the Level 2 SFRA states *“the risk of reservoir failure was not considered in the SFRA due to implications for national security”*.

GMCA Level 1 Strategic Flood Risk Assessment for Greater Manchester – Update 2019

- 2.16 The Greater Manchester Combined Authority (GMCA) produced a SFRA in 2018, which was replaced by the updated version in 2019. The SFRA was commissioned for the Greater Manchester Spatial Framework (GMSF) allocations and each of the ten Greater Manchester (GM) district council's land supply sites for housing, office space and industrial / warehousing space. The 10 district council's included Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan. The GMSF joint development plan was superseded by the Places for Everyone Plan (PfE), as

Stockport Metropolitan District Council withdrew from the GMSF, which was formally adopted in March 2024.

2.17 The Level 1 SFRA therefore reviewed existing and future flood risk screening of potential development sites under the following categories:

- GMSF allocations (2019);
- Baseline land supply (2018);
- Call for sites (2018)

GMCA Greater Manchester Level 2 Hybrid Strategic Flood Risk Assessment – Main Report 2020

2.18 The aim of the Level 2 SFRA was to build on the findings of the Level 1 SFRA, focussing on high-risk communities or sites. The Level 2 SFRA considers:

- 56 individual Level 2 site screening assessment reports for 52 residential land supply sites and five GMSF allocations;
- Broadscale fluvial modelling of nine GMSF allocations; and
- Broad flood risk reviews of 14 large GMSF strategic sites.

Updated Environment Agency (EA) Flood Maps

2.19 Whilst the SFRAs form the basis of initially identifying relevant alternative sites, since the SFRAs had been produced, the EA flood maps highlighting flood risk have been updated (August 2025) which differ from the extent of flooding as set out in the SFRAs. This is therefore accounted for within the assessment.

Summary

2.20 This Section has reviewed the adopted national and local planning policy context relating to potential flood risk issues at the Site and the outcome of the SFRA, taking into account the updated EA flood maps.

2.21 The following sections of this report will set out how adopted policy and guidance can be satisfactorily addressed and there are no reasons, based on flood risk grounds, why the Site cannot come forward for residential development.

3 RYEBANK FLOOD RISK

Strategic Flood Risk Assessment

- 3.1 The Site is identified within the GMCA Level 1 2019 SFRA¹ (Ref: Chor_Cap_1000 – Ryebank Road), and therefore this has been used to compare the flood risk at the Site to other alternative sites. For ease, Table 1 below summarises the SFRA assessment of the flood risk to the Site from all sources.

Table 1. Level 1 SFRA Flood Risk Summary Table for Ryebank

Source	Flood Risk
Flood Zone	The Level 1 2019 SFRA identifies the site as being entirely within Flood Zone 1.
Surface Water	Predominantly Very Low Risk, with areas of Low (2.36%), Medium (0.84%) and High (0.75%) risk areas
Reservoir	The Level 1 2019 SFRA identified that 68.35% (3.01 ha) is situated within the reservoir extent.

- 3.2 The SFRA does not consider flooding in relation to potential for groundwater flooding. The SFRA states *“Detailed groundwater information has not been made available for this SFRA. Groundwater information will be very localised and may differ significantly across GM.”* Nevertheless, the Site specific FRA submitted with the planning application has assessed the risk of groundwater flooding.
- 3.3 Within the Level 1 SFRA Local Plan Sites Assessment, the Site falls under Recommendation D which states a site-specific FRA is required. Therefore, there was no requirement for the Site to be progressed to the Level 2 SFRA and consequently was not included. Therefore, there is no site specific information set out in the Level 2 SFRA for Chor_Cap_1000 – Ryebank Road.

¹ Greater Manchester Combined Authority - Level 1 Strategic Flood Risk Assessment for Greater Manchester – Update [March, 2019]

Site Specific Flood Risk Assessment

- 3.4 The planning application was supported by a Flood Risk Assessment² prepared by Renaissance which assessed the risk of flooding from all known sources and found that the flood risk at the Site was between 'Very Low' and 'Medium'. This assessment was prepared in line with the requirements of the NPPF (2024), MCC's and TMBC's planning guidance, and the results are summarised below:

Table 2: Flood Risk Summary Table

Source	Flood Risk
Fluvial	Medium (Site is in Flood Zone 2 and flood mitigation measures are to be implemented)
Surface Water	Very low to low risk. (Development proposals and installation of drainage system will mitigate residual risk)
Reservoirs	Low (Site is within maximum extent of reservoir flood, however is extremely unlikely to occur)
Groundwater	Medium (risks can be mitigated by ensuring the Finished Floor Levels are set above external levels)
Sewers	Low

- 3.5 A Site specific FRA has been prepared and the proposals direct development away from increased flood risk areas as set out in the supporting information submitted with the planning application. Only small areas of the Site are at risk of medium or high surface water flood risk, with the majority of the Site being at low risk of surface water flooding.
- 3.6 The FRA proposes a number of mitigation measures which includes the following:
- Finished Floor Levels - The habitable ground floor levels are to be set above the 1 in 100 year plus a 41% allowance for climate change levels plus an agreed freeboard. All finished floor levels should be set to a minimum of 27.840mAOD.
 - Compensation Storage - It has been assessed that the proposed development will require 128.85m³ of flood storage for the 1%AEP+41% CC event. This is to be

² Renaissance – Flood Risk Assessment: RBM-REN-XX-XX-RP-C-00001 Rev P05

accommodated within the surface water detention basin above the maximum water level which has been defined as 25.770mAOD. Based on a minimum bank level of 27.125mAOD and a surface area of 500m² the basin can accommodate up to 675m³ of flood compensation volume. The footpath to the west of the basin is to incorporate a weir to enable flood water to overtop the basin and maintain the existing flood flow route.

- Flood Flow Routes - In order to maintain hydraulic connectivity, the levels along the boundaries are to be retained. Where the existing flood flow route crosses the proposed highway, the road is to be elevated, and two 300mm diameter drains are to be provided beneath to maintain the east-west hydraulic connectivity.
- Safe Access and Egress - A safe dry route is to be provided to all dwellings for the 1% AEP+41%CC event. This will ensure that occupiers can evacuate the Site and emergency services can safely enter the Site if required. The minimum road level is to be set above the flood level of 27.270mAOD.
- Flood Resilient Construction – The substation is to be provided outside the maximum flood extent and is to have a minimum FFL of 27.840mAOD.

3.7 Overall, the technical assessment demonstrates that the proposed development is predominantly at low risk to most sources of flooding, excluding fluvial and groundwater which is considered medium.

Updated EA Flood Maps

3.8 As identified above, the updated flood maps must also be considered. Renaissance therefore updated the submitted FRA to reflect the updated EA Flood Maps, which included the following changes:

3.9 The Site previously was situated in Flood Zone 1 only; it is now situated within Flood Zones 1 and 2.

3.10 The Site previously was subject to very low to high surface water flood risk; it is now subject to very low to low surface water flood risk.

3.11 As outlined above, the updated EA maps identify that the Site is at risk of fluvial flooding. Therefore, the following section of this report considers the sequential test in relation to flood risk from this source for the Site.

4 METHODOLOGY

- 4.1 This Section sets out the methodology and scope of the sequential test and provides further details of the methodology used to assess alternative sites. The adopted methodology was reviewed by MCC who provided no comments on the approach.
- 4.2 In accordance with Paragraph 174 of the NPPF, in order to apply the sequential test it is necessary to establish whether there are any 'reasonably available' alternative sites appropriate for the proposed development. Planning Practice Guidance makes it clear (at Paragraph: 028 Reference ID: 7-028-20220825) that 'reasonably available sites' are those in a suitable location for the type of development proposed with a reasonable prospect that the Site is available to be developed at the same time as the proposal.
- 4.3 Annex 2: Glossary of the NPPF requires that for sites to be considered 'deliverable' the following must apply:
- Sites should be available now;
 - Sites should offer a suitable location for development now; and
 - Sites should be achievable with a realistic prospect that housing will be delivered on the site within five years.
- 4.4 It therefore follows that identifying 'suitable' potential alternative sites requires the identification of sites within an appropriate area of search that are:
- a) Of a comparable size (including reasonable combinations of smaller sites with a spatial relationship, and parts of larger sites);
 - b) Be able to deliver the proposed development at the same time; and,
 - c) Be in conformity with the requirements of adopted national and local planning policy.
- 4.5 As set out below, the area of search is limited to the Chorlton Ward in MCC's administrative area and Longford Ward within TMBC's administrative area.

Sources of Potential Alternative Sites

- 4.6 The following sources were used to identify sites, which were then subject to the criteria set out below to assess whether they comprised reasonable alternative sites to be included in the assessment.

- The Manchester Strategic Housing Land Availability Assessment 2025 ('SHLAA') – Residential Only;
- GMCA Level 1 SFRA 2019;
- Updated EA Flood Maps;
- Existing allocated sites in the Development Plans relevant to MCC and TMBC (which included the Places for Everyone Joint Development Plan Document);
- Safeguarded land as identified in the adopted Development Plans;
- Extant planning permissions for the same or similar developments to the proposal, where development has not yet commenced; and
- An internet search of land presently being marketed on Rightmove.

Area of Search

- 4.7 Planning Practice Guidance advises (at Paragraph: 027a Reference ID: 7-027a-20220825) that the area for applying the Sequential Test should be governed by local circumstances relating to the catchment area for the type of development proposed and the need it is proposing to address. Additionally, an appropriate area of search should be based on the development type proposed and relevant spatial policies. This strategy is corroborated in the recent Mead/Redrow High Court decision³.
- 4.8 The proposed development seeks to address the needs identified in the following planning policies and local regeneration initiatives:
- Places for Everyone Policy JP-H1 (Scale, Distribution and Phasing of New Housing Development), which states that a minimum of 60,061 net additional dwellings will be delivered in Manchester over the period 2022-2039, which will need to be of good quality and design, adaptable, supported by the necessary infrastructure and amenities.

³ Mead Realisations Limited v Secretary of State for Levelling Up, Housing and Communities and Redrow Homes Limited v Secretary of State for Levelling Up, Housing and Communities [2024] EWHC 278 (Admin)

- Manchester Core Strategy Policy H 6 (South Manchester), which states that South Manchester area (including Chorlton) will accommodate around 5% of new residential development over the plan period.
- The need for high quality and affordable housing that has been identified as part of Manchester City Council's wider development plans for the Chorlton area.
- The need identified in the Ryebank Road Development Framework⁴ to support the existing residential offer of Chorlton, through new development which encourages healthy and sustainable activities and provides an environment that promotes a sense of belonging but also, walking, social activity and being outdoors in communal spaces.

4.9 Therefore, the area of search consisted of the electoral ward of Chorlton (MCC) and Longford (TMBC) which the site is partially situated within.

Site Size / Threshold

4.10 Potential alternative sites were identified that have a capacity for a similar number of dwellings to the application (with a degree of flexibility). Planning Practice Guidance (PPG) clarifies (at Paragraph: 028 Reference ID: 7-028-20220825) that:

'In considering whether alternative lower-risk sites (which could, where relevant, be a series of two or more smaller sites) would be capable of accommodating the proposed development, such alternative sites do not need to be owned by the applicant to be considered "reasonably available".'

4.11 Therefore, parts of larger sites were considered, as well as a combination of smaller sites that have a reasonable spatial relationship to accommodate the proposed development. We considered sites that are up to 20% larger than the application site (c. 5.53 ha) and up to 20% smaller than the application site (c. 3.69 ha). This also includes the proposed alternative being able to deliver the development through splitting the site across multiple alternative sites which are reasonably related to one another, the PPG (Paragraph: 027a Reference ID: 7-027a-20220825) states:

⁴ Manchester Metropolitan University: Ryebank Road, Chorlton, Manchester – Development Framework. Available Online:
https://www.manchester.gov.uk/_data/assets/file/0022/123655/ryebank_road_development_framework_final.pdf

"It may also, in some cases, be relevant to consider whether large scale development could be split across a number of alternative sites at lower risk of flooding, but only where those alternative sites would be capable of accommodating the development in a way which would still serve its intended market(s) as effectively."

- 4.12 This is considered to be a proportionate approach to the assessment, in accordance with PPG (Paragraph: 027a Reference ID: 7-027a-20220825) which states:

"The sequential test should be applied proportionately, focusing on realistic alternatives in areas of lower flood risk that could meet the same development need."

- 4.13 Sites with a comparable level of policy designation/constraints were considered as potential alternative sites for the delivery of the proposed development.

- 4.14 Sites with the following restrictive planning constraints were discounted as reasonable alternative sites:

- Green Belt
- National Landscapes (previously referred to as Areas of Outstanding Natural Beauty ('AONB'))
- Areas of Local Landscape Importance
- Special Landscape Areas
- Protected Employment Land or allocated for another land-use
- Proposed Open Space
- New Playing Fields
- Sites within Flood Zones 2 and 3
- Sites being at high risk of Groundwater Flooding

Reasonably Available

- 4.15 The following matters were considered in establishing if the potential alternative sites could be considered reasonably available:

- Any site where residential development has commenced was not considered an alternative to the proposed Site;

- Whether there is an extant planning permission for a site, and involvement from a developer/housebuilder;
- Any site being actively promoted by a Developer/Housebuilder, or for which a planning application has been submitted by a Developer/Housebuilder.

4.16 In addition, it is acknowledged that the PPG indicates (at Paragraph: 028 Reference ID: 7-028-20220825) that sites do not need to be owned by the applicant to be considered 'reasonably available'. For a site to be a reasonably available alternative, there must be a reasonable prospect of the site being 'available' to the applicant, or a reasonable chance that the landowner will develop the land with proposals similar to those proposed in this planning application. In other words, if the current landowner is unwilling/unable to sell the land to the applicant or another developer, or develop it themselves for the proposed development as described below, it cannot be considered as reasonably available:

'Erection of a residential development comprising 120 dwellings (including a mix of housing types and tenures) together with open spaces, landscaping, sustainable drainage features, cycleways and pedestrian footways, vehicular accesses and highways, parking provision and other associated works.'

Timescales

4.17 As referenced previously, the PPG states at Paragraph: 028 Reference ID: 7-028-20220825 that:

'Sites should be considered 'reasonably available' for the purposes of the sequential test if their location is suitable for the type of development proposed, they are able to meet the same development needs and they have a reasonable prospect of being developed at the same time as the proposal.'

4.18 The proposed development at the Site is expected to be delivered within 5 years. Sites were only considered as potential alternative sites where they can be delivered in the same timeframes.

Summary

4.19 In summary, the following sources were consulted to identify potentially alternative sites:

- The Manchester Strategic Housing Land Availability Assessment 2025 ('SHLAA');
- GMCA Level 1 SFRA 2019;

- Updated EA Flood Maps;
- Existing allocated sites in the Development Plans (including the Places for Everyone Joint Development Plan Document);
- Safeguarded land as identified in the Development Plans;
- Extant planning permissions for the same or similar developments to the proposal; and
- An internet search of land presently being marketed on Rightmove.

4.20 Any sites identified from the above process were assessed further if:

- They are located within the electoral ward of Chorlton and Longford; and
- They have an area of approximately 4.61 hectares (either as single sites, parts of larger sites or a combination of smaller sites with a reasonable spatial relationship).
- They can feasibly deliver the proposed development as proposed (i.e the housing types and tenure proposed).

4.21 Any sites identified from the above process were then assessed in relation to the following:

- Whether the site is reasonably available – i.e. a site is not available if: it has commenced development; is being actively promoted by, or has a planning application submitted by a developer or housebuilder; is not ‘available’ to the applicant; or, there is a reasonable chance that the landowner will develop the land with proposals similar to those proposed in this planning application;
- Whether the site could deliver housing in the same timeframe as the proposed development (5 years);

4.22 Any sites that meet the criteria set out above were considered as potential alternative sites and were assessed to establish whether they are sequentially preferable to the proposed site taking into account flood risk.

4.23 If any sequentially preferable sites were identified, these were assessed against other sustainability or environmental considerations to determine whether they were considered a preferable alternative site.

5 SEQUENTIAL TEST

Stage 1 – Initial Review and Filtering of Alternative Sites

Stage 1.1: Identification of Potential Sites

- 5.1 To complete Stage 1, a series of tables have been produced below which identifies a range of sites and provides an assessment of if they are reasonably available.

The Manchester Strategic Housing Land Availability Assessment 2025 ('SHLAA') 2025 – Residential Only

5.2 Five sites within the Manchester SHLAA were identified by the criteria outlined in the methodology above. The sites identified from the Manchester SHLAA 2025 is set out in the table below. However, only one site is considered available, the other identified site have received planning permission and are under construction (as highlighted in the table).

Table 3: SHLAA Sites

Site Reference	Site Name	Area (ha)	Status
Chor_Cap_030	Chorlton District Centre	1.75	Available – planning permission has also been granted, but is not yet under construction. However, the site area is lower than the required threshold outlined above. In addition, there are no other sites available with a spatial relationship that could deliver the proposals as proposed. Total number of dwellings 262
136791/FO/2023	Former Chorlton Leisure Centre Manchester Road Chorlton M21 9PQ	0.34	Under Construction Total number of dwellings 50
136878/FO/2023	4b Albany Road M21 0AW (part of Albany Road Trading Estate)	0.2	Under Construction Total number of dwellings 40
Chor2303	Manchester Islamic High School for Girls	0.4	Under Construction Total number of dwellings 22
132708/FO/2022	Car park of Chorlton Irish Club, Cross Road	0.2	Under Construction Total number of dwellings 29

GMCA Level 1 SFRA 2019

5.3 The site above identified from the SHLAA, Chor_Cap_030, is also set out in the GMCA Level 1 SFRA 2019 with regards to flood risk. For reference, the Ryebank Road site (Chor_Cap_1000) identified within the SHLAA and SFRA is also provided in both Table 4 and 5 for comparison.

Table 4: GMCA 2019 Level 1 SFRA fluvial and surface water flooding

			Fluvial Flood Zone Coverage								Risk of Flooding from Surface Water					
			Flood Zone 1		Flood Zone 2		Flood Zone 3a		Flood Zone 3b		Low Risk (1 in 1000 year outline)		Medium Risk (1 in 100 year outline)		High Risk (1 in 30 year outline)	
Site Reference	Site Name	Area (ha)	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%
Chor_Cap_030	Chorlton District Centre	1.75	1.75	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.09	5.38	0.01	0.48	0.00	0.00
Chor_Cap_1000	Ryebank Road	4.40	4.40	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.10	2.36	0.04	0.84	0.03	0.75

Table 5: GMCA 2019 Level 1 SFRA Reservoir Extent

Reservoir Extent				
Site Reference	Site Name	Total Area (ha)	Area in Reservoir Extent (ha)	%
Chor_Cap_030	Chorlton District Centre	1.75	0.55	31.64
Chor_Cap_1000	Ryebank Road	4.40	3.01	68.35

5.4 As outlined above, each site is provided with a recommendation from the Level 1 SFRA. Each site was identified under Strategic Recommendation D which states a site specific FRA is required and is therefore not required to be assessed within the Level 2 SFRA.

Updated EA Flood Maps

5.5 As outlined in the methodology, the Updated EA Flood Maps provide the most up to date information and are therefore utilised in the sequential test to compare the sites rather than the GMCA Level 1 SFRA. In addition, the Ryebank Road (Chor_Cap_1000) site in the SHLAA covers 4.4ha of the Site. The Site assessed as part of the planning application is slightly larger at 4.61ha, so the proposed development area has been used in this assessment. Whilst the updated EA Flood Maps show the fluvial flood risk figures remain the same, Table 6 below outlines the updated figures in relation to surface water flood risk and groundwater flood risk differ from those reported in the 2019 Level 1 SFRA. This shows risk of surface water flooding for low, medium and high risk are all greater per percentage within Chor_Cap_030 than the proposed development Site.

Table 6: Updated EA Flood Maps fluvial and surface water flooding

			Fluvial Flood Zone Coverage								Risk of Flooding from Surface Water					
			Flood Zone 1		Flood Zone 2		Flood Zone 3a		Flood Zone 3b		Low Risk (1 in 1000 year outline)		Medium Risk (1 in 100 year outline)		High Risk (1 in 30 year outline)	
Site Reference	Site Name	Area (ha)	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%	Area (ha)	%
Chor_Cap_030	Chorlton District Centre	1.75	1.75	100.00	0.00	0.00	0.00	0.00	0.00	0.00	0.24	13.8	0.30	17.3	0.034	2
Proposed Development Site	Ryebank, Chorlton	4.61	4.19	90.9	0.42	9.1	0.00	0.00	0.00	0.00	0.57	12.3	0.04	0.9	0.018	0.4

Table 7: Updated EA Flood Maps for reservoir flooding

Reservoir Extent			
Site Reference	Site Name	Total Area (ha)	FRA Summaries
Chor_Cap_030 (which is the same site as 142652/FO/2025)	Chorlton District Centre	1.75	The FRA submitted with 142652/FO/2025 states “The local SFRA indicates that the site does not lie within an area at risk of groundwater flooding. However, the Phase 2 site investigation undertaken by Civic Earth (see Section 3.6) identifies perched

			groundwater within the made ground at levels between 28.58mAOD and 26.70mAOD. The potential for perched water and groundwater ingress during excavation and construction and in the permanent case should be considered by the contractor during construction. Furthermore, a capping layer of concrete may be required to prevent flotation of drainage assets such as attenuation tanks below the groundwater levels to prevent flotation." The FRA defined the level of risk as Medium.
Proposed Development Site	Ryebank, Chorlton	4.61	The FRA identifies the site at Low risk (risks can be mitigated by ensuring the Finished Floor Levels are set above external levels)

Existing allocated sites in the Development Plan

- 5.6 A review of the relevant residential Housing Site Allocations from the Saved Policies of the Manchester UDP, the Manchester Core Strategy and the PfE Joint Development Plan Document has been undertaken. A review has also been undertaken of the Saved Policies of the Revised Trafford Unitary Development Plan (adopted June 2006); and Trafford Local Plan: Core Strategy (adopted January 2012). No residential allocations have been identified within Chorlton and Longford Wards, therefore no sites are considered from the adopted Development Plans.

Rightmove – Land Availability

- 5.7 In accordance with the methodology outlined above, available land should be considered within the assessment which may be considered sequentially preferable. Therefore, a review of all land for sale on Rightmove within the Chorlton Ward and Longford Ward was identified and considered below. Table 8 outlines one landholding for sale within Chorlton ward. Only one site was identified, however the land for sale is not considered to be a suitable alternative to

deliver the proposed development. This is because of the site size and the site being able to accommodate the proposed development. Therefore no available sites for sale have been identified and therefore are not considered further within the assessment.

Table 8: Sites identified through a land for sale search using Rightmove.

Site / Address	Size	Description	Suitability
430-432a Wilbraham Road, Chorlton	<1ha	Building with planning permission for conversion to provide eight self contained apartments with the erection of a third floor rear roof extension and associated elevational alterations to existing outrigger in a sought after town centre location.	Unsuitable due to the potential number of dwellings and size of the site.

Planning Applications

5.8 Relevant residential planning applications which have been approved with the last 5 years, within Chorlton and the Longford Wards, were identified via MCC's and TMBC's planning portal which are outlined in Table 9. The planning applications identified are all mostly currently under construction, and therefore are not considered available for the purposes of the sequential test. Two planning applications have been approved but are not yet under construction.

Table 9: Approved Planning Applications

Planning Reference	Description	Location	Status
MCC			
132708/FO/2022	Erection of a part three, part four storey development to provide 29 (10 x one and 18 x two bed and 1 x studio) residential units with associated vehicular and cycle parking, refuse store and landscaping	Car Park To The Rear Of Chorlton Irish Club Cross Road Manchester M21 9DJ Approximately 1km south east of the site.	Application approved 04/10/2022 Under construction – not available
136878/FO/2023	Erection of a 4 storey building to form 40 no. residential apartments, together with cycle and car parking, bin store, landscaping and boundary treatments following demolition of existing buildings.	4B Albany Road Manchester M21 0AW Approximately 660m south of the site.	Application approved 23/10/2023 Under construction – not available

136791/FO/2023	Erection of 2 no. 5 storey residential buildings comprising 50 no. dwellings (Class C3) with ancillary communal facilities; and, associated access, car parking, bin store, amenity space and landscaping, following the demolition of the existing building	Former Chorlton Leisure Centre Manchester Road Chorlton Manchester M21 9PQ Approximately 500m east of the site.	Application approved 31/08/2023 Under construction – not available
135604/FO/2022	Erection of a 65 dwellings (Use Class C3(a)), with associated infrastructure, including landscaping, ecological mitigation, drainage and car parking, access from Wilbraham Road, and demolition of garage to the rear of 354 Wilbraham Road	Land To The Rear Of 354 Wilbraham Road Manchester Approximately 1.4km east of the site	Application approved 13/10/2023 Under construction – not available
137994/FO/2023 (Ref in SHLAA: Chor2303)	Erection of 12 no. 2.5 storey dwellinghouses; a pair of three storey semi-detached dwellinghouses; a three storey building comprising 6 no. apartments; the retention and change of use of the existing mansion house together with the erection of a two storey side extension to form 2 no. dwellinghouses; creation of vehicular access points, associated landscaping, car parking and boundary treatment following the demolition of the other existing buildings and structures.	Manchester Islamic High School For Girls 55 High Lane Manchester M21 9FA Approximately 760m south east of the site	Application approved 02/04/2025 Under construction – not available
142652/FO/2025 (Ref in SHLAA: Chor_Cap_030)	Erection of 6 no. residential buildings of 10, 8, 6 and 4 storeys in height to provide up to 262 residential dwellings (Use Class C3) with ground floor commercial uses (Use Class E (a-e)); infrastructure works including electric substation and associated utilities works, basement and ground level car parking, service yard, vehicular and pedestrian accesses; together with public realm works and hard/soft landscaping following the	Chorlton Square Shopping Centre Barlow Moor Road Manchester M21 9AQ Approximately 500m south east of the site	Application approved 18/12/2025 Not yet under construction – potentially available

	demolition of the existing buildings and structures on site.		
TMBC			
117039/FUL/25	Residential development (use class C3) of 53 dwellings with associated amenity space, access, car and cycle parking, external landscaping, drainage and other associated works.	Land At Lacy Street Stretford Approximately 1.1km south west of the site	Application Approved 17/12/2025 Not yet under construction – potentially available

- 5.9 Stage 1 of the sequential test involves identifying all sites within the sources set out above, (including sites allocated in the adopted Development Plans; sites with planning permission; SHLAA sites / sites within the 2019 Level 1 SFRA; available land identified through Rightmove), that also meet the agreed parameters, in terms of sites with appropriate capacity and within the agreed area of search.
- 5.10 As set out above, this also included a search for a combination of smaller sites. No sites were identified that could deliver the proposals as intended i.e with the mix of housing types and tenures proposed.

Stage 1.2: Review and Elimination of Sites

- 5.11 The sites outlined above are set out in Table 10 below with the reasons for being included or excluded from Stage 2 of the sequential test. A colour coded system has been used - sites which are red are excluded and not considered further in the assessment, and those sites coloured green are considered within the next stage of the assessment.

Table 10. Stage 1.2 Review

Site Reference	Site Name	Reason for Inclusion / Exclusion for Stage 2
2019 Level 1 SFRA / SHLAA sites		
Chor_Cap_030	Chorlton District Centre	Excluded – the site does not meet the required thresholds for the site size and does not have a reasonable spatial relationship with any other identified site to accommodate the proposed development as proposed. A planning application has been submitted on this site, see below 142652/FO/2025, which was approved 18 th December 2025., see below.
136791/FO/2023	Former Chorlton Leisure Centre Manchester Road Chorlton M21 9PQ	Excluded – this site is currently under construction and therefore is not considered an available site.

136878/FO/2023	4b Albany Road M21 0AW (part of Albany Road Trading Estate)	Excluded – this site is currently under construction and therefore is not considered an available site.
Chor2303	Manchester Islamic High School for Girls	Excluded – this site is currently under construction and therefore is not considered an available site.
132708/FO/2022	Car park of Chorlton Irish Club, Cross Road	Excluded – this site is currently under construction and therefore is not considered an available site.
Rightmove Sites		
430-432a Wilbraham Road, Chorlton	N/A	Excluded – Unsuitable. The site does not meet the required thresholds for the site size and does not have a reasonable spatial relationship with any other identified site to accommodate the proposed development as proposed..
Planning Applications		
132708/FO/2022	Car Park To The Rear Of Chorlton Irish Club Cross Road Manchester M21 9DJ	As above, Excluded – this site is currently under construction and therefore is not considered an available site.
136878/FO/2023	4B Albany Road Manchester M21 0AW	As above, Excluded – this site is currently under construction and therefore is not considered an available site.
136791/FO/2023	Former Chorlton Leisure Centre Manchester Road Chorlton Manchester M21 9PQ	Excluded – this site is currently under construction and therefore is not considered an available site.
135604/FO/2022	Land To The Rear Of 354 Wilbraham Road Manchester	As above, Excluded – this site is currently under construction and therefore is not considered an available site.

137994/FO/2023	Manchester Islamic High School For Girls 55 High Lane Manchester M21 9FA	As above , Excluded – this site is currently under construction and therefore is not considered an available site.
142652/FO/2025	Chorlton Square Shopping Centre Barlow Moor Road Manchester M21 9AQ	Excluded – the planning application is situated within Chor_Cap_030 as outlined above. The site can provide up to 246 dwellings (as permitted), however it does not meet the required thresholds for the site size and does not have a reasonable spatial relationship with any other identified site. Due to the site's size, it cannot accommodate the development as proposed i.e deliver a mix of housing types and tenures (including specialist accommodation and co-housing homes), with supporting infrastructure such as a village green.
117039/FUL/25	Land At Lacy Street Stretford	Excluded - unsuitable due to the potential number of dwellings and size of the site and therefore not considered an available site. Nor does have a reasonable spatial relationship with any other identified site to accommodate the proposed development as proposed i.e deliver a mix of housing types and tenures (including specialist accommodation and co-housing homes), with supporting infrastructure such as a village green.

5.12 Following the Stage 1 review, all the sites have been excluded and are not considered suitable. Therefore, the Proposed Development is considered sequentially preferable.

6 EXCEPTION TEST

6.1 As the sequential test has been satisfied in the previous section, this section addresses the requirements of the exception test. The following requirements of planning policy are addressed:

- Identifying the sustainability benefits of the proposals; and,
- Demonstrating the safety of the development from flood risk over its lifetime.

Methodology

- 6.2 The first stage of the assessment is to analyse the site in terms of the sustainability benefits that the proposed development will bring.
- 6.3 The second stage of the assessment is to identify the flood risk mitigation measures that will be employed to protect on and off-site receptors during the lifetime of the development. These mitigation measures take into account the effects of climate change.

Step 1 – Sustainability Benefits

- 6.4 The proposed development will deliver various public benefits which principally include the delivery of much needed housing. Manchester Core Strategy Policy H 6 (South Manchester), states that South Manchester will accommodate around 5% of new residential development over the plan period (which equates to 3,000 homes), and Places for Everyone Policy JP-H1 (Scale, Distribution and Phasing of New Housing Development), which states that a minimum of 60,061 net additional dwellings will be delivered in Manchester over the period 2022-2039. The proposed development includes a varied housing mix including 35% affordable housing, age-friendly affordable apartments, private sale houses, co-housing homes with communal facilities and supported living accommodation for autistic adults.
- 6.5 The supporting documents accompanying the planning application set out in detail the benefits of the proposed development but in summary the site is a sustainable development opportunity, and the proposed development of the site will lead to a number of social, economic and environmental related benefits which are set out below:
- Contribution to MCC's housing supply;
 - Provision of 35% affordable housing;

- Co-housing homes with communal facilities;
- Supported living accommodation for autistic adults;
- Increased overall BNG;
- Provision of new high quality housing in a sustainable location;
- Creation of new construction jobs;
- Measures within the proposed development to minimise carbon emissions and reduce energy demand;
- Provision of public open space;
- Flood Risk mitigation.

Step 2 – Flood Risk Protection

- 6.6 A Flood Risk Assessment and Surface Water Drainage Strategy Report have been prepared by Renaissance.
- 6.7 Most of the site is within Flood Zone 1, and partially within Flood Zone 2. A number of mitigation measures are proposed including:
- All finished floor levels will be set to a minimum of 27.840mAOD;
 - Flood compensation is to be provided for up to the 1%AEP+41% climate change (CC) event which includes a surface water detention basin above the maximum water level which has been defined as 25.770mAOD. Based on a minimum bank level of 27.125mAOD and a surface area of 500m² the basin will be able to accommodate up to 675m³ of flood compensation volume;
 - A safe dry route is to be provided to all dwellings for the 1% AEP+41%CC event. This will ensure that occupiers can evacuate the site and emergency services can safely enter the site if required;
 - The minimum road level is to be set above the flood level of 27.270mAOD;
 - The substation is to be provided outside the maximum flood extent and is to have a minimum FFL of 27.840mAOD. The 0.1% AEP flood level of 27.600mAOD is below the proposed minimum FFL of 27.840mAOD.

- 6.8 The site is at a low risk of surface water flood risk. The development proposals and installation of drainage system will mitigate residual risk.
- 6.9 The site is at low risk of Sewer flooding, and so no mitigation is required.
- 6.10 Groundwater flood risk is considered medium; however risk is mitigated by ensuring building FFLs are set above external levels.
- 6.11 The Site is considered to be at low risk of Reservoir flooding. The site is within maximum extent of reservoir flood, but it is extremely unlikely to occur.
- 6.12 Overall, the technical assessment demonstrates that the proposed development is at low risk to sources of flooding and should therefore be viewed as acceptable in flood risk terms.

Summary

- 6.13 In summary, the proposed development will provide wider sustainability benefits to the community and a series of flood risk measures are proposed to ensure that the proposed development will be made safe for its lifetime.

7 SUMMARY AND CONCLUSIONS

- 7.1 This Sequential and Exception test has been prepared by Asteer Planning on behalf of Step Places, Southway Housing Trust and Manchester Metropolitan University in support of a full application for a residential development at Ryebank, Chorlton. The report has been prepared to satisfy the requirement of the flood risk policy in the NPPF and PPG.
- 7.2 This sequential and exception test has been informed by the comprehensive Flood Risk Assessments prepared by Renaissance (May, 2026) which were submitted in support of the planning application.
- 7.3 A site specific sequential test has been undertaken and this has not identified any reasonably available suitable alternative sites within the search area which are sequentially preferable in terms of flood risk. The exception test has also been considered and this has demonstrated that the proposed development will provide wider sustainability benefits to the community that outweigh the flood risk and will be safe for its lifetime.

APPENDIX 1 – SITE LOCATION PLAN



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NOTE:
All contractors must take the site and be responsible for taking and checking all dimensions relative to their work.
Notes and details are to be taken from any applicable drawings and site conditions.
Electronic data drawings based on 'read only' and should not be interpreted for measurement.
All dimensions and levels should be 'read only' from those values stated & not on the drawings.

KEY PLAN:

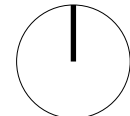
KEY

Application boundary

Base drawing comprised of OS and
Topo information.

- E 06/01/25 Council Boundaries removed onto drawing SPA-MP-XX-DR-A-000003
- D 19/12/24 Planning Issue
- C 05/12/24 Draft Planning Issue
- B 25/11/24 Draft Planning Issue
- A 19/09/24 Update to the red line boundary and indication of Manchester & Trafford Council boundary line.

REV: DATE: DETAILS:



NORTH

5plus architects

PROJECT: Ryebank Road
Chorlton
TITLE: Existing Site Location Plan
Application Boundary
SCALE: 1:1000 @ A1
ORIGIN DATE: 05/03/24
DRAWN: RK
STATUS: Planning
PROJECT: 05476
DRAWING NO: SPA-MP-XX-DR-A-000001
REV: E
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