AshtonHale

Sequential Test for Flood Risk Assessment

232-236 Palatine Road, Didsbury

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

1.2 The site is currently occupied by 3 detached houses which have been converted and extended to accommodate 22 separate apartments in total. It is proposed to demolish the existing buildings and create 83 no. apartments, and 5 no. townhouses.

Planning Policy Context

1.3 Paragraph 181 of the National Planning Policy Framework states:

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

1.4 Paragraph 174 of the NPPF states:

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

1.5 Paragraph 175 further notes:

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).

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

"Where it is not possible to locate development in low-risk areas, the Sequential Test should go on to compare reasonably available sites:

- *Within medium risk areas; and*
- *Then, only where there are no reasonably available sites in low and medium risk areas, within high-risk areas[1].*

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

Relevant decision makers need to consider whether the test is passed, with reference to the information it holds on land availability. The planning authority will need to determine an appropriate area of search, based on the development type proposed and relevant spatial policies. The applicant will need to identify whether there are any other 'reasonably available' sites within the area of search, that have not already been identified by the planning authority in site allocations or relevant housing and/or economic land availability assessments, such as sites currently available on the open market.

1.8 PPG defines 'reasonably available sites'[2] if 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. 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''*.

1.1 ———————————

1.1 [1] Paragraph: 024 Reference ID: 7-024-20220825
1.2 [2] Paragraph: 028 Reference ID: 7-028-20220825

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

Area of Search

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

Reasonably Available Sites Allocated in Adopted Development Plans

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

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

Reasonably Available Sites Identified in Land Availability Assessments

1.13 The most recent Strategic Housing Land Availability Assessment was published in 2025. A map of the identified sites within the West Didsbury Ward is shown at Appendix III, outlined in light blue.

1.14 Out of 17 sites:

- 4 are 'under construction', and are therefore not reasonably available
- 2 are 'capacity sites', i.e. do not have planning permission but could have the potential to be developed for housing
- 11 have planning permission for residential development

1.15 The 13 sites that could reasonably be available are set out below with their assessed capacity.

1. Land to the South of Cavendish Road- 2 dwellings
2. 19 Old Lansdowne Road- 1 dwelling
3. 78 Clyde Road- 2 dwellings
4. Former Car Park area of Greenfinch pub (now Wren House), 108 Palatine Road- 37 dwellings
5. 101A Lapwing Lane Manchester- 1 dwelling
6. 129 Barlow Moor Road- 1 dwelling
7. 123 Barlow Moor Road- 4 dwellings
8. Land Between 2A Crossway And 15 Barlow Moor Road- 1 dwelling
9. First Floor Barlow House 708 - 716 Wilmslow Road- 6 dwellings

10. 758A Wilmslow Road M20 2DW- 3 dwellings
11. 246 Palatine Road- 1 dwelling
12. 95 Palatine Road- 24 dwellings (capacity site)
13. 232-236 Palatine Road- 35 dwellings (capacity site)

1.16 The application site is identified within Manchester City Council's most recent Strategic Housing Land Availability Assessment with an indicative capacity of approximately 35 dwellings. It is important to note that SHLAA capacity assumptions are produced at a high-level and are intended to provide a broad indication of potential housing supply across the city, rather than to prescribe the quantum of development that may ultimately come forward through the planning application process.

1.17 In this case, the proposed development of 88 no. residential units reflects a more efficient and sustainable use of the site , consistent with the objectives of the National Planning Policy Framework to make effective use of land and to significantly boost the supply of homes. The scheme has been informed by a comprehensive appraisal of site constraints and opportunities, including flood risk, access, urban design, and amenity considerations.

1.18 The uplift from the SHLAA capacity figure does not represent an overdevelopment of the site, but rather a refinement based on detailed technical work and design development. The proposed density is appropriate to the site's context, accessibility, and policy framework, and delivers a significantly more efficient use of land while remaining fully compliant with flood risk policy and wider planning considerations.

1.19 Accordingly, the SHLAA capacity of 35 dwellings should be treated as a baseline or starting point for assessment, rather than a fixed quantum. The proposed scheme demonstrates that a higher density development can be successfully accommodated on the site in a safe, sustainable, and policy compliant manner.

Assessment of Need and Demand

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

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

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

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

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

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

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

1.24 This identifies a high need for 2 and 4-bedroom dwellings, which collectively account for 94% and 6% of the proposed scheme. As such, it can be concluded that the proposed development on this site would address the dwelling mix identified as in need in South Manchester.

Exception Test

1.25 Where it is not possible to direct development to an area at lower risk of flooding, the Exception Test must be applied, supported by appropriate mitigation measures.

1.26 As set out in the NPPF, the purpose of the Exception Test is to demonstrate that, where sites at lower flood risk are not available, flood risk to people and property can be managed satisfactorily. To satisfy the test, it must be shown that:

- the development will deliver wider sustainability benefits to the community and the wider area that outweigh the flood risk; and
- 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.

1.27 The wider sustainability benefits of the proposed development, which satisfy the first limb of the Exception Test, are set out within the accompanying Planning Statement and include the efficient redevelopment of a previously developed residential site, the delivery of additional homes in a highly sustainable location, and a contribution towards identified housing need in South Manchester.

1.28 These benefits are considered to outweigh the flood risk, particularly where the development is supported by the mitigation measures set out in the accompanying Flood Risk and Drainage Report.

1.29 As detailed within the technical documents supporting this submission, a number of flood mitigation measures have been implemented to ensure the development is safe for its lifetime whilst avoiding increasing overall flood risk. The site is at low risk of flooding from all forms of flooding except fluvial flooding for which the measures above have been incorporated to mitigate the level of overall flood risk associated with the development.

For further details of mitigation measures applied to this development, please refer to the Flood Risk & Drainage Report prepared by Clancy Consulting.

Conclusion

1.30 The above analysis has demonstrated that there are no suitable or available sites in the defined search area of the West Didsbury Ward to accommodate the proposed development either together or in their distinct parts. The site has additionally been recognised within the latest SHLAA as a Capacity Site, capable of accommodating future housing requirements.

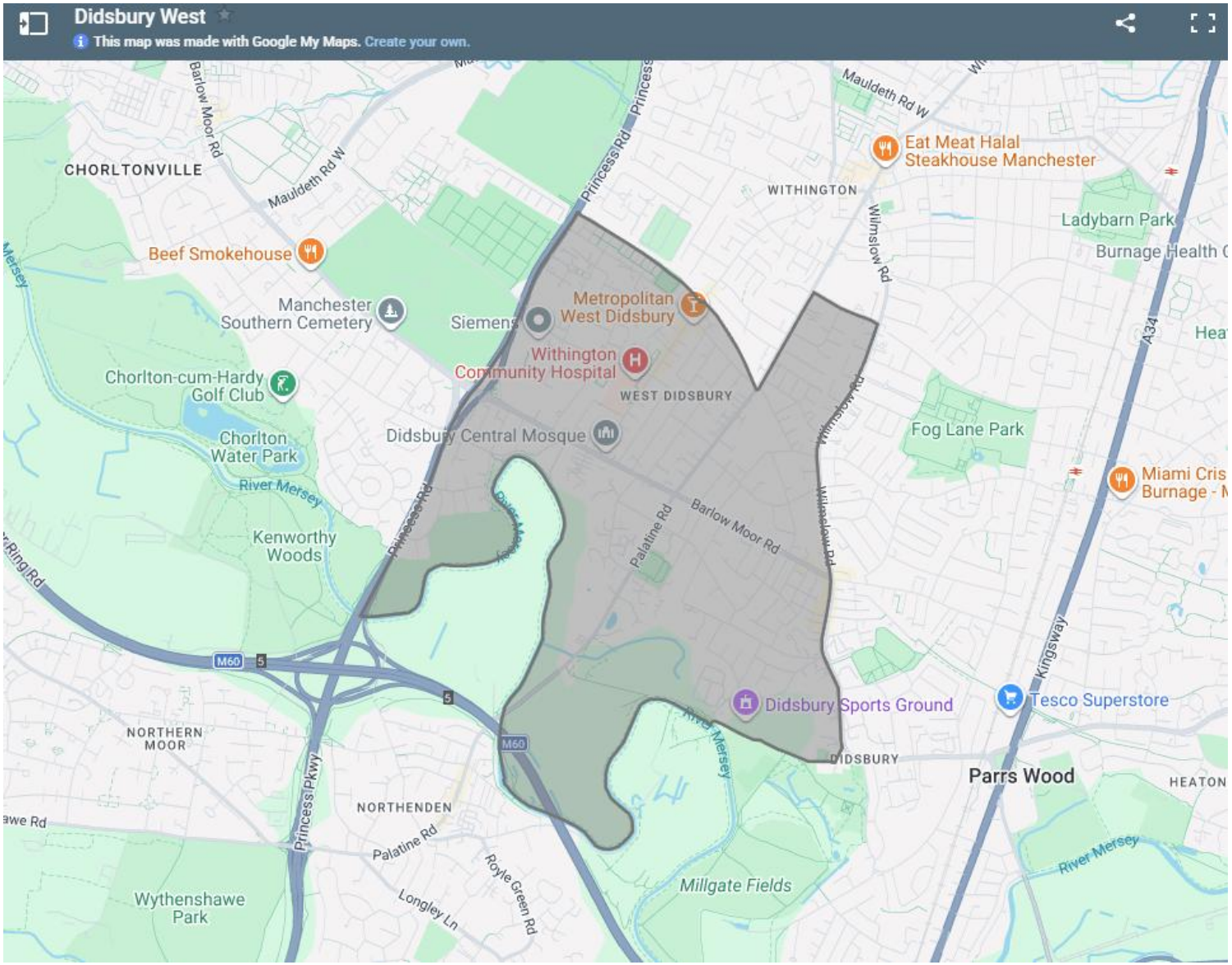
1.31 This is a site already used for residential development, and which is immediately adjacent to a block of apartments which are occupied at ground-floor level.

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

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

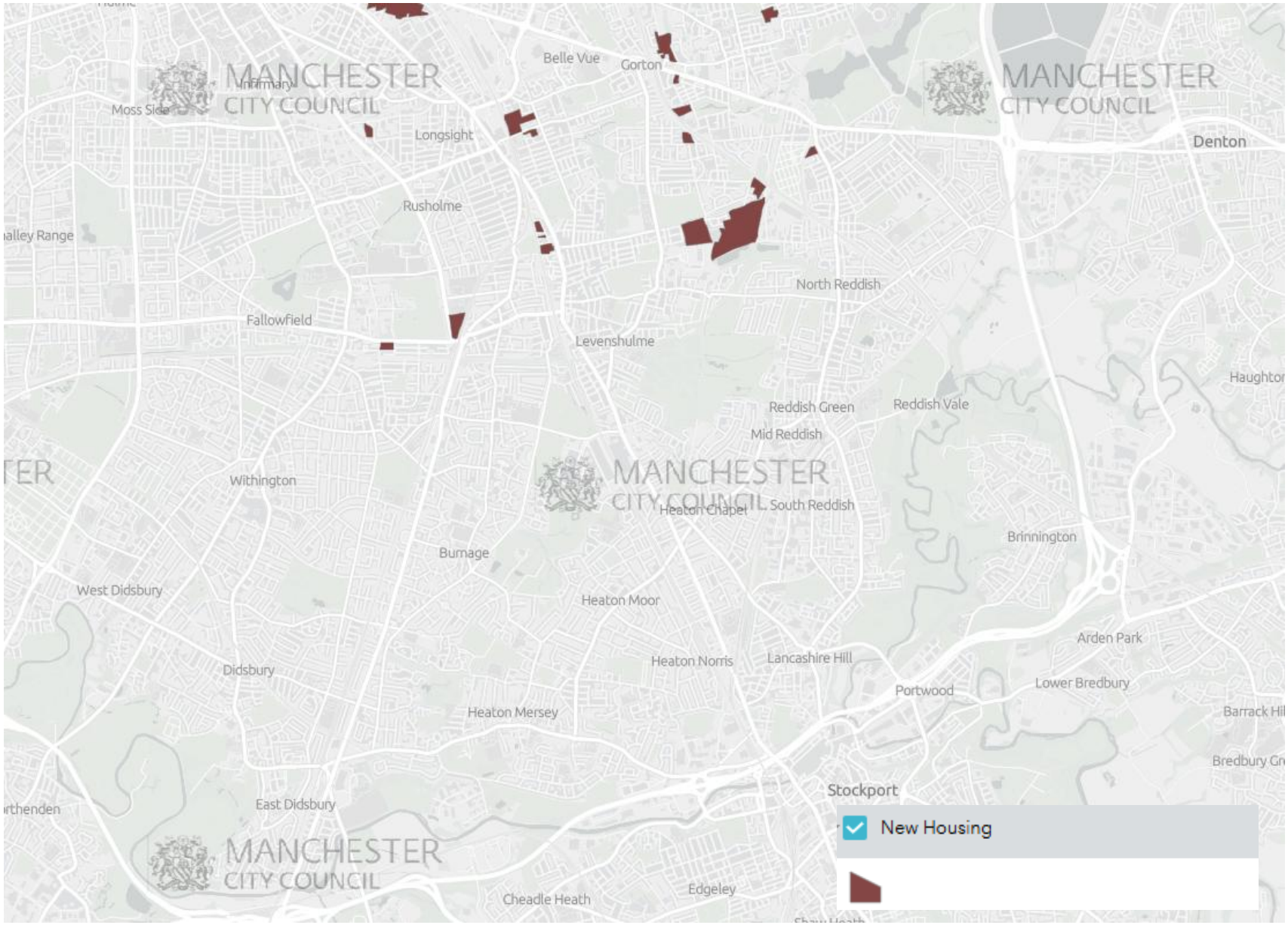
Appendix I

West Didsbury Ward Boundary Map


Didsbury West
This map was made with Google My Maps. Create your own.
CHORLTONVILLE
Barlow Moor Rd
Mauldeth Rd W
Princess Rd
Eat Meat Halal Steakhouse Manchester
WITHINGTON
Wilmslow Rd
Ladybarn Park
Beef Smokehouse
Manchester Southern Cemetery
Siemens
Metropolitan West Didsbury
Withington Community Hospital
WEST DIDSBURY
Chorlton-cum-Hardy Golf Club
Didsbury Central Mosque
Fog Lane Park
Chorlton Water Park
River Mersey
Kenworthy Woods
Palatine Rd
Barlow Moor Rd
A34
Kingsway
M60
Didsbury Sports Ground
Tesco Superstore
NORTHERN MOOR
NORTHENDEN
DIDSBURY
Parrs Wood
HEATON
Princess Pkwy
Royle Green Rd
Longley Ln
Millgate Fields
Wythenshawe Park

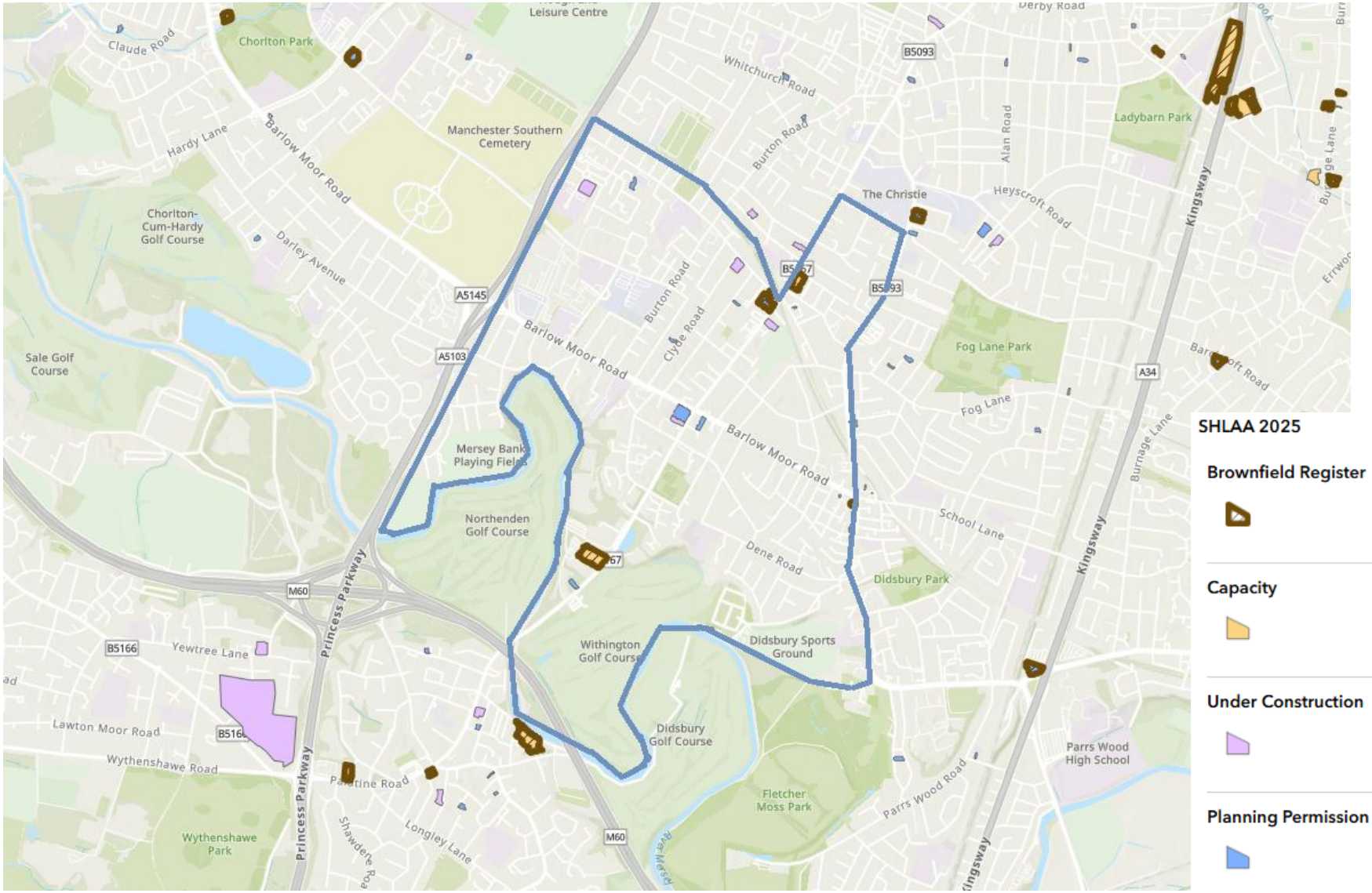
Appendix II

Proposals Map Extract


MANCHESTER
CITY COUNCIL
Belle Vue
Gorton
Moss Side
Longsight
Rusholme
Denton
North Reddish
Fallowfield
Levenshulme
Reddish Green
Reddish Vale
Mid Reddish
Withington
Heaton Chapel
South Reddish
Brinnington
Burnage
West Didsbury
Heaton Moor
Arden Park
Heaton Norris
Lancashire Hill
Didsbury
Portwood
Lower Bredbury
Heaton Mersey
Stockport
East Didsbury
Cheadle Heath
Edgeley
New Housing

Appendix III

SHLAA Map Extract



SHLAA 2025

Brownfield Register

Capacity

Under Construction

Planning Permission