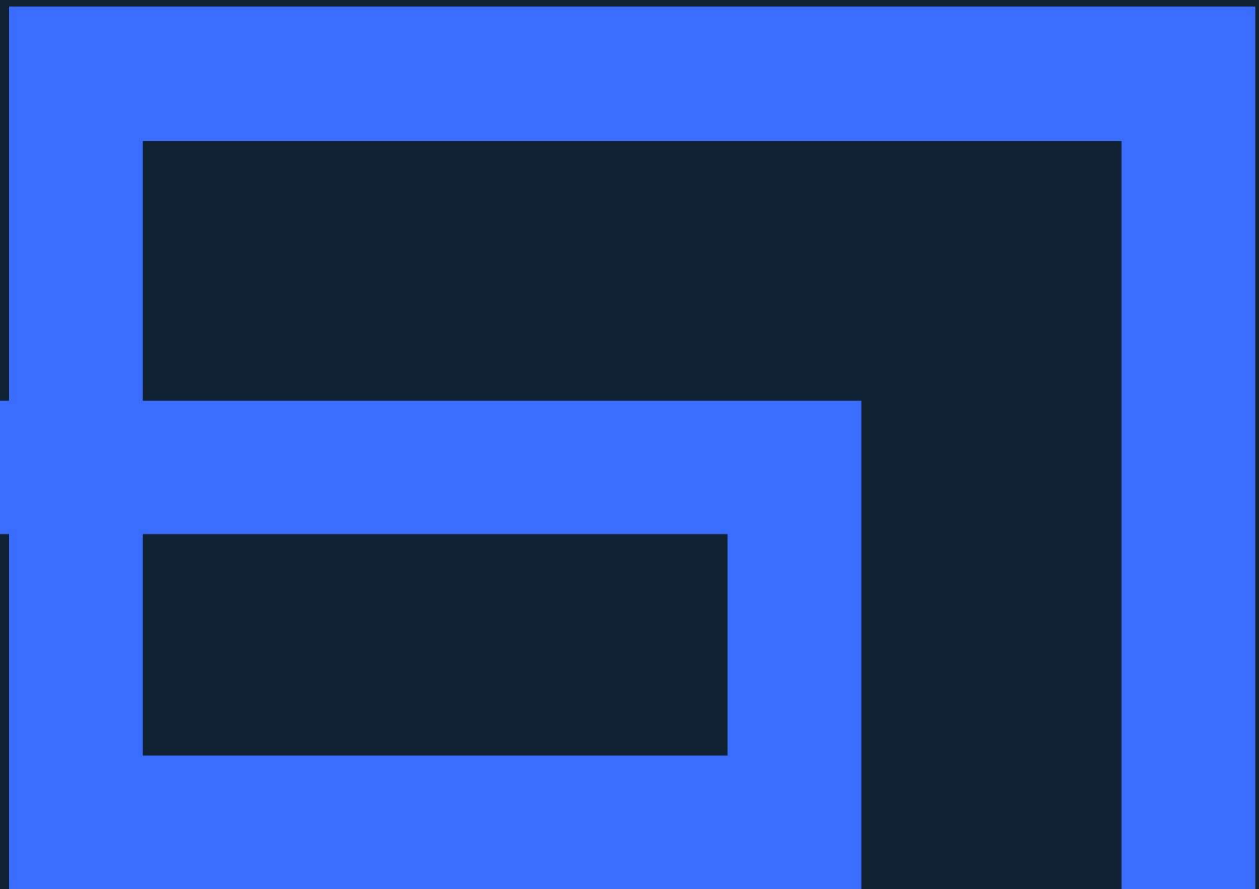


Flood Risk Assessment

Ambrose Street and Clayton Lane South, Manchester

Change of use of a warehouse (Use Class B2/B8) to temporary indoor sport use for padel courts (Use Class E(d)) for a period of 5 years



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1 Introduction

Overview

- 1.1 This Flood Risk Assessment ('FRA') had been prepared by Padel Plan ('the Agent') and is submitted in support of a planning application made to Manchester City Council ('the Council') on behalf of Padel Republic ('the Applicant') seeking full planning permission for the *"Change of use of a warehouse (Use Class B2/B8) to temporary indoor sport use for padel courts (Use Class E(d)) for a period of 5 years"* ('the proposal') at 39 Clayton Lane South, Manchester, M12 5PG ('the site').

Relevant Policy and Legislation

- 1.2 The National Planning Policy Framework ('NPPF') is the overarching policy document that sets out the Government's policies on planning and is a material consideration in the determination of all planning applications. Chapter 18 of the NPPF focuses specifically on 'Managing flood risk and coastal change' stating:

"The objective of the policies in this chapter is to minimise risks to development arising from all sources of flooding and coastal change, taking into account the impacts of climate change, by steering development away from areas of risk, ensuring that development will be safe for its lifetime without increasing flood risk elsewhere, and incorporating sustainable drainage systems where appropriate."

- 1.3 Policy F4 of the NPPF sets out assessing flood risk for decision-making.

'1. To inform the assessment of flood risk and, where relevant, appropriate mitigation, a site specific flood risk assessment should accompany all development proposals in Flood Zones 2, 3a, and 3b as defined in Annex F, table 1.

2. In Flood Zone 1, a site-specific flood risk assessment should inform and accompany all development proposals involving:

a. Sites of one hectare or more;

b. Land which has been identified by the Environment Agency as having critical drainage problems; and

c. Land identified in a strategic flood risk assessment or the Flood Map for Planning as being at risk of flooding from any source, whether now or in the future.

3. Site-specific flood risk assessments should be appropriate to the scale, nature, and location of development and should, where relevant, support an assessment of whether a development proposal satisfies the sequential and exception tests set out in policies F5 and F6.'

- 1.4 This requirement is reflected in the development framework for Manchester City Council which comprises the Core Strategy Development Plan Document ('CS'). Policy EN 14 of the CS states:

"In addition to the requirements for site-specific Flood Risk Assessments (FRAs) set out in PPS25, an appropriate FRA will also be required for all development proposals, including changes of use, on sites greater than 0.5ha within Critical Drainage Areas (CDAs) and Canal Hazard Zones identified in the SFRA.

All new development should minimise surface water run-off, including through Sustainable Drainage Systems (SUDS) and the appropriate use of Green Infrastructure. Developers should have regard to the surface water run-off rates in the SFRA User Guide. In CDAs, evidence to justify the surface water run-off approach / rates will be required."

- 1.5 In addition to the above, this FRA has been assessed with reference to the following documents and legislative guidelines:

- CIRIA 753 The SUDS Manual V8 (2018);
- DEFRA "Flood Risk Assessment Guidance for New Developments" (2006);
- DEFRA "Surface Water Management Plan Technical Guidance" (2010);
- BS 8533 2017 Assessing & Managing Flood Risk in Development Code of Practice (2017);
- BS 8582:2013 Code of practice for surface water management for development Sites (2013);
- National Planning Practice Guidance (2012 – updated 2022);
- C624 Development and Flood Risk – Guidance for the Construction Industry' (2004);
- Planning Policy Guidance – Flood Risk and Climate Change (2014 – updated 2022).

2 Site Context and Proposed Development

Site Description

- 2.1 The site is located 3.7km southeast from the centre of Manchester, located within East Manchester, at the south end of Ambrose Street, comprising of an industrial warehouse. The site is accessed from Ambrose Street and Clayton Lane South, with the immediate surroundings comprising industrial warehouses and similar business uses. The total development site area is approximately 1,250m².
- 2.2 The nearest residential properties are located approximately 80 metres to the south of the proposed padel court facility. Given this separation distance, it is considered that the development would not give rise to any adverse impact on the amenity of nearby residents.
- 2.3 An aerial image of the site in its current state is provided in Figure 2.1 below.

Figure 2.1 – Aerial Image of the Site (Source: Google Maps)



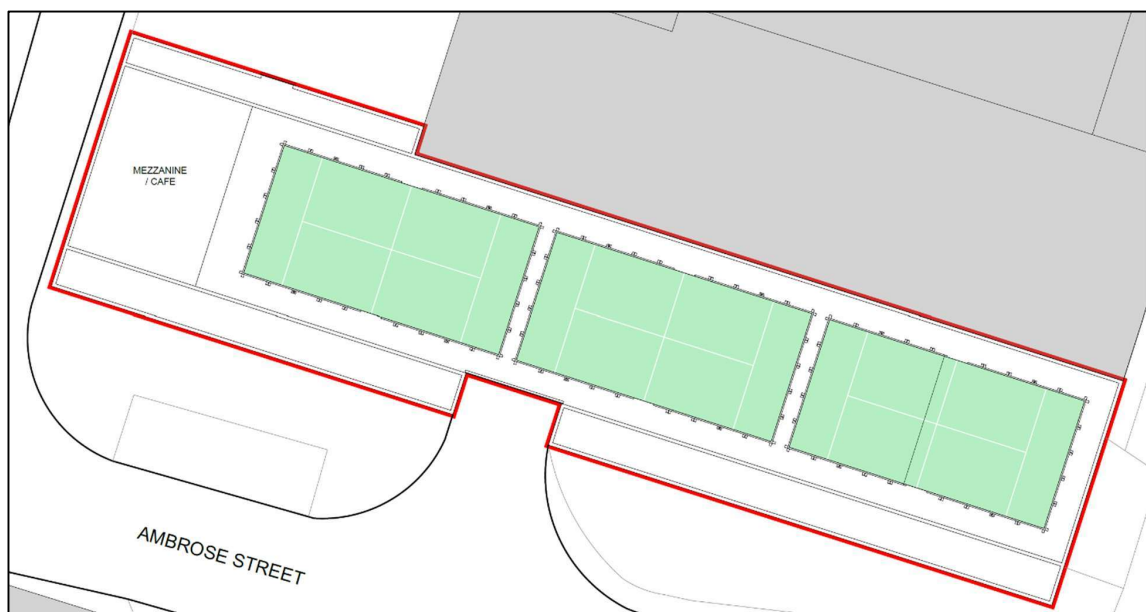
Hydrology

- 2.4 The site is located approximately 60 metres to the north of Corn Brook, this is a small watercourse that is the only water body with the potential to affect the site in terms of flood risk.

Proposed Development

- 2.5 The proposal is for the change of use of a warehouse (Use Class B2/B8) to indoor sport use (Use Class E(d)) for temporary period of 5 years.
- 2.6 It is proposed to erect three padel tennis courts within the building with an associated café and mezzanine floor at the west end of the building. The main physical changes to the building will be internal.
- 2.7 The proposals include the creation of a mezzanine floor at the western end of the building. This will provide a seating and viewing area for players and spectators using the facility, together with an on-site café. In addition, changing and toilet facilities will be provided within the warehouse to support the operation of the development.
- 2.8 The proposed development comprises a high-quality indoor padel facility accommodating three padel courts. Each court will be constructed using a combination of glazed panels and wire-mesh enclosure, consistent with standard competition-grade padel court design. The playing surfaces will consist of specialist artificial turf suitable for indoor padel use, providing appropriate grip, performance and durability.
- 2.9 The proposed Site Plan is shown in Figure 2.2 below.

Figure 2.2 – Proposed Site Plan



3 Potential Flood Risk

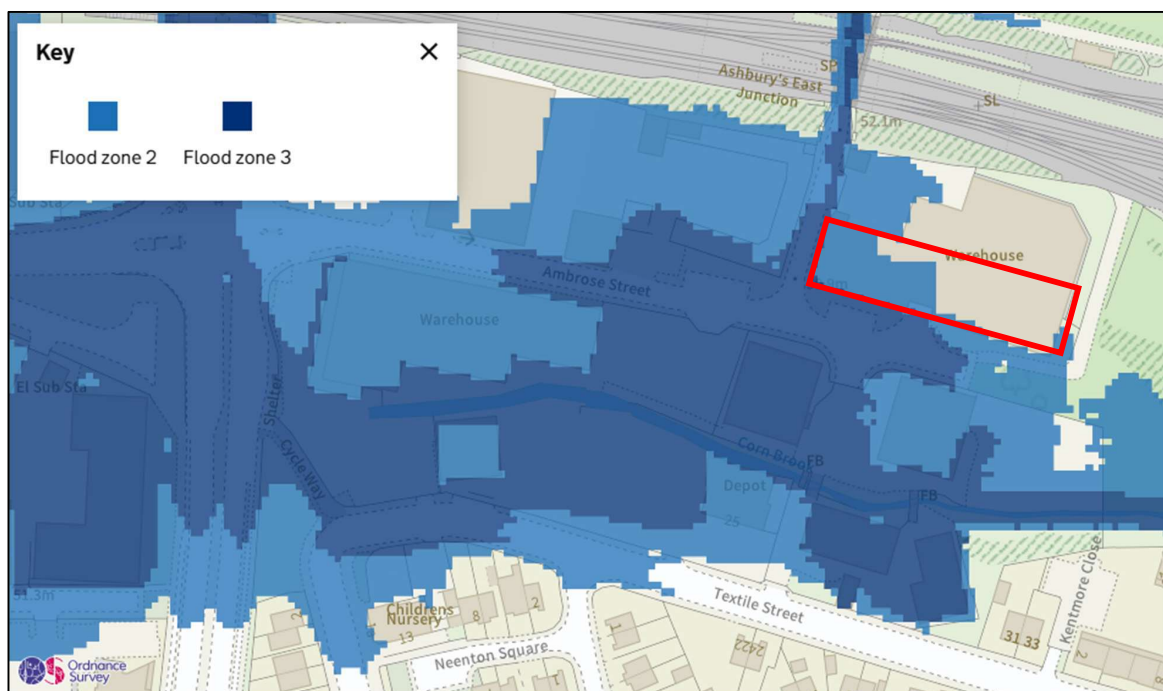
Sources of Flooding

- 3.1 This section of the FRA assesses flood risk from all sources. Section 4 then discusses in further detail the probability of flooding, any potential impacts and necessary mitigation if required in the context of national and local planning policy.

Environment Agency Flood Zones

- 3.2 The Environment Agency Flood Risk Map for Planning shows the site is located within Flood Zones 1, 2 and 3. Flood Zone 1 is defined as land with less than a 0.1% annual probability of flooding from rivers or the sea. Flood Zone 2 is defined as land which has a 1 in 100 to 1 in 1,000 yearly chance of flooding from rivers, or 1 in 200 to 1 in 1,000 from flooding from the sea. Flood Zone 3 is defined as land which has 1-in-100 or greater chance in any year of river flooding or 1-in-200 or greater chance in any year of sea/tidal flooding.
- 3.3 The potential fluvial/coastal risk to the site is shown in Figure 3.1 below which is taken from the Environment Agency Flood Risk Map for Planning.

Figure 3.1 – Environment Agency Flood Risk Map for Planning

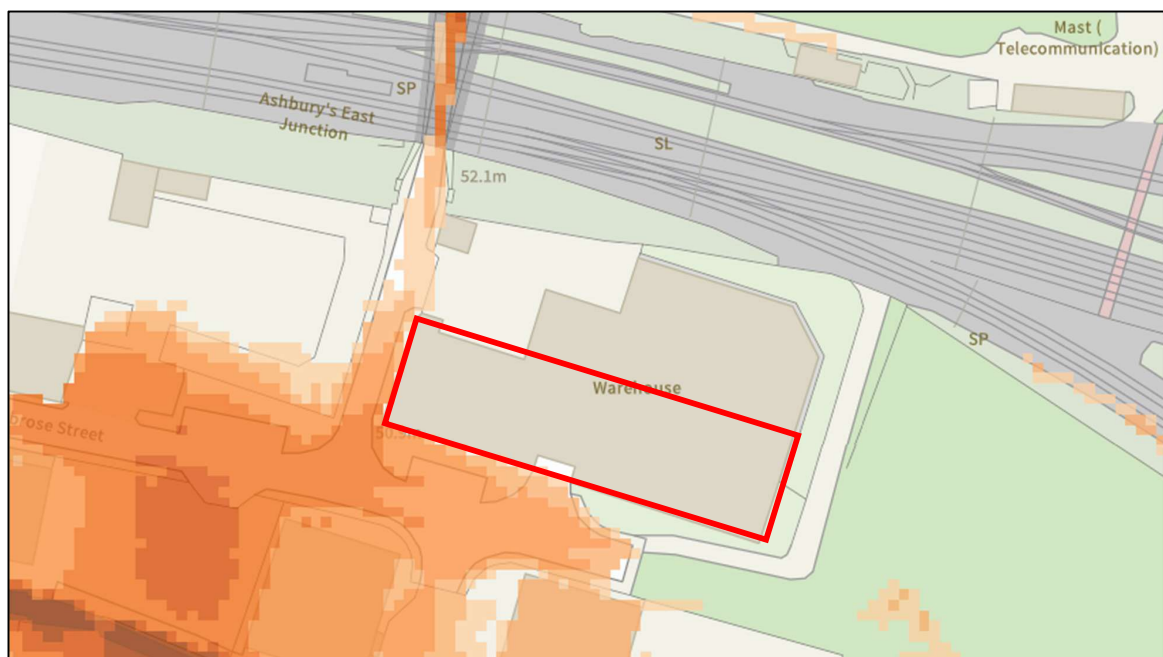


- 3.4 The Environment Agency Flood Risk Map for Planning does not distinguish between Flood Zones 3a and Flood Zones 3b (i.e. functional floodplain). However, the site is located primarily within Flood Zone 1 and 2 with only the southwestern corner of the warehouse falling within Flood Zone 3. Furthermore, as an existing building within a built up area, the site clearly does not form part of the functional floodplain.

Pluvial (Surface Water) Flooding

- 3.5 The Environment Agency Flood Risk Map for Planning also includes data relating to pluvial flood risk. As shown from the extract from the mapping included in Figure 3.2 below, the site is at a low risk of pluvial flooding. Whilst the surrounding area does include areas at a higher risk of surface water flooding, the proposed development is confined to the application site as shown on the submitted plans.

Figure 3.2 – Environment Agency Flood Risk Map for Planning (Pluvial Flood Risk)



Groundwater Flooding

- 3.6 Given the building is already in situ and the wider site and surrounding area is developed, it is considered the risk from groundwater flooding is low.

Flooding From Sewers

- 3.7 As the site is previously developed, there is an existing foul water sewer connection within the site. As such, the site is considered to be at medium risk of flooding from sewers.

4 Flood Risk Assessment

- 4.1 The NPPF sets out the Government's national planning policies in relation to flood risk. As summarised in Section 1 of this FRA, it requires a site-specific FRA to be undertaken in support of planning applications within flood risk areas and, where applicable, the application of the Sequential and Exception Tests.

Exception Test

- 4.2 The NPPF sets out the Government's national policies on different aspects of land use planning in England in relation to flood risk. This is outlined in Section 1 of this FRA above and, alongside the requirement to undertake a site-specific flood risk assessment, to apply the *"sequential"* and *"exception"* tests as necessary.
- 4.3 As outlined above, the Environment Agency's Flood Risk Map for Planning shows that the site is mainly within Flood Zone 1 and Flood Zone 2 with a small percentage of the site in Flood Zone 3, which means the majority of the land has both less than 0.1% and between 0.1% and 1% chance in any year of flooding from rivers or the sea. With a small fraction to the south western edge of the site having +1% chance of flooding in any year.
- 4.4 Table 2 of the NPPF outlines various land uses and categories them in terms of their vulnerability to flood risk, each use falling within either *"essential infrastructure"*, *"highly vulnerable"*, *"more vulnerable"*, *"less vulnerable"*, or *"water compatible development"*.
- 4.5 The proposal on this occasion is for the change of use of a warehouse building to an indoor padel facility. The NPPF categorises leisure as being in the *"less vulnerable"* flood risk classification. As the existing use is a warehouse which is also defined as *"less vulnerable"*, this aspect of the proposal is considered to be immaterial with regard to flood risk and no further assessment is required in this respect.
- 4.6 Table 3 of the NPPF details which classifications of development require the exception test to be undertaken depending on the Flood Zone the site lies within. This table is replicated below.

Table 4.1 - Flood risk vulnerability and flood zone 'incompatibility'

Flood zones	Flood Risk Vulnerability Classification				
	Essential infrastructure	Highly vulnerable	More vulnerable	Less vulnerable	Water compatible
Zone 1	✓	✓	✓	✓	✓
Zone 2	✓	Exception test required	✓	✓	✓
Zone 3a †	Exception test required †	X	Exception test required	✓	✓
Zone 3b *	Exception test required *	X	X	X	✓ *

Key:

✓ Exception test is not required

X Development should not be permitted

- 4.7 As demonstrated by the NPPF Flood Risk Vulnerability Classification table above, the exception test is not required for this proposal. The proposed development falls within the category of less vulnerable use, which is appropriate in Flood Zones 1,2 and 3a without the need to apply the exception test.

Sequential Test

- 4.8 The NPPF also requires the 'Sequential Test' to be applied to ensure that proposed developments are carried out in areas that are at the least risk of flooding, before considering development in areas that are at risk of flooding.
- 4.9 Policy F5 of the NPPF acknowledges that the sequential test is not required for certain types of development, including changes of use, other than changes of use to a caravan, camping or chalet site, or to a mobile home or park home site. As the proposed development constitutes a change of use and does not fall into the latter category, it is considered that the sequential test does not apply in this instance.

5 Summary and Conclusions

- 5.1 This Flood Risk Assessment has been prepared in support of a planning application for the change of use of a warehouse to an indoor padel facility at 39 Clayton Lane South, Manchester, M12 5PG.
- 5.2 In line with the NPPF and Planning Practice Guidance, the FRA has identified all potential sources of flooding.
- 5.3 The site is mainly within Flood Zone 1 and Flood Zone 2 with a small percentage of the site in Flood Zone 3, which means the majority of the land has both less than 0.1% and between 0.1% and 1% chance in any year of flooding from rivers or the sea. With a small fraction to the south western edge of the site having +1% chance of flooding in any year.
- 5.4 The site is considered to be safe from risk of flooding from pluvial and groundwater flooding, with a minor risk of flooding from sewers.
- 5.5 Having regard to the NPPF Flood Risk Vulnerability Classification, the proposed development is considered to constitute a less vulnerable use and as such the exception test is not required. In addition, as the proposal constitutes a change of use, Policy F5 of the NPPF confirms that the sequential test does not apply.
- 5.6 As a result, it is considered that the proposal on this occasion complies with all relevant national and local planning policy in relation to flood risk and flood risk should not preclude the development.