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Environment Agency

Manchester City Council - Development Control
MANCHESTER, M60 2JT

Reference: PA-0005405/01
Customer reference: PLA-2026-000312
16 June 2026

Erection of three interconnected blocks (T1, T2 and T3) of 8, 10 and 38 storey's including ground, plus basement and plant, comprising purpose-built student accommodation with ancillary internal amenity space (Sui Generis) together with flexible commercial uses (Use Class E); landscaping works, highways, access, servicing, infrastructure and other associated works.

Charles Street Multi-Storey Car Park Charles Street Plot H Sister Manchester M1 7AR

Dear Jennifer Atkinson,

Thank you for consulting the Environment Agency (EA) on the above application on 1 June 2026.

Environment Agency Position

We have no objection in principle to the proposed development but wish to make the following comments.

As part of this consultation we have reviewed the following documents:

- A Preliminary Geoenvironmental Appraisal by Calabrian ltd, dated Nov. 2025,
- A Piling Strategy Contamination Risk Assessment report by Roscoe ltd dated Nov. 2025
- A Shooters Brook Easement Statement by Roscoe ltd dated Jan. 2026
- A Flood Risk Assessment and Drainage Strategy by Roscoe ltd dated Nov. 2025

The application's submissions demonstrate that it will be possible to manage the risks posed to controlled waters by this development. Further detailed information is however required before built development is undertaken. We believe that it would place an unreasonable burden on the developer to ask for more detailed information

prior to the granting of planning permission but respect that this is a decision for the LPA. This is required prior to commencement of the development.

In light of the above, the proposed development will be acceptable, if a planning condition is included requiring the submission of a detailed land contamination management strategy. This should be carried out by a competent person in line with paragraph 196 of the NPPF.

Without the following conditions we would object to the proposed development in line with paragraph 187 of the NPPF because it cannot be guaranteed that the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land, where appropriate or will not be put at unacceptable risk from, or be adversely affected by, unacceptable levels of water pollution.

Condition
No development approved by this planning permission shall commence until a remediation strategy to deal with the risks associated with contamination of the site in respect of the development hereby permitted, has been submitted to, and approved in writing by, the LPA. This strategy will include the following components:

1. A detailed site investigation scheme, based on the submissions of preliminary geoenvironmental reporting, to provide information for a detailed risk assessment to all receptors that may be affected, including those off-site.
2. A tiered risk assessment using the results of the site investigation referred to in (1).
3. An options appraisal including sustainability and treatability studies of the remediation measures required and how they are to be undertaken.
4. A remediation strategy and verification plan providing details of the data that will be collected in order to demonstrate that the works set out in the remediation strategy are complete and identifying any requirements for longer-term monitoring of pollutant linkages, mitigation, maintenance and arrangements for contingency action.

Any changes to these components require the written consent of the LPA. The scheme shall be implemented as approved.
Reason
To ensure that the development does not contribute to, and is not put at unacceptable risk from or adversely affected by, unacceptable levels of water pollution in line with paragraph 187 of the NPPF. This is supported by Policy EN17 (Water Quality) of the current Manchester Local Plan (adopted 11 July 2012).

To ensure the development will contribute to and enhance the natural and local environment by remediating and mitigating despoiled, degraded, derelict,

contaminated and unstable land, where appropriate in line with paragraph 187 of the NPPF.

Condition
Prior to any part of the permitted development being occupied, a verification report demonstrating the completion of works set out in the approved remediation strategy and the effectiveness of the remediation shall be submitted to, and approved in writing, by the LPA. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met.
Reason
To ensure that the site does not pose any further risk to the land and water environment by demonstrating that the requirements of the approved verification plan have been met and that remediation of the site is complete. This is in line with paragraph 187 of the NPPF. This is supported by Policy EN17 (Water Quality) of the current Manchester Local Plan (adopted 11 July 2012).

As you are aware, the discharge and enforcement of planning conditions rests with your authority. You must therefore be satisfied that the proposed meets conditions meet the requirements of the 6 tests in paragraph 57 of the NPPF.

Please notify us immediately if you are unable to apply our suggested conditions, to allow further consideration and advice.

Advice to LPA / Applicant

Flood risk standing advice

The proposed development falls within Flood Zone 2, which is land defined in the planning practice guidance as being at risk of flooding.

We have produced a series of standard comments for local planning authorities and planning applicants to refer to on ‘lower risk’ development proposals. These comments replace direct case-by-case consultation with us. This proposal falls within this category.

These standard comments are known as Flood Risk Standing Advice (FRSA). They can be viewed at https://www.gov.uk/guidance/flood-risk-assessment-for-planning-applications#when-to-follow-standing-advice.

We recommend that you view our standing advice in full before making a decision on this application. We do not need to be consulted.

Model Procedures and good practice
This development site appears to have been the subject of past industrial activity which may pose a risk of pollution to controlled waters.

We recommend that you should:

- Follow the risk management framework provided in Guidance on Land contamination risk management (LCRM) Land contamination risk management (LCRM) - GOV.UK (www.gov.uk), when dealing with land affected by contamination
- Refer to the contaminated land pages on gov.uk for more information
- Refer to 'The Environment Agency's approach to groundwater protection'

All investigations of land potentially affected by contamination should be carried out by or under the direction of a suitably qualified competent person and in accordance with BS 10175 (2001) Code of practice for the investigation of potentially contaminated sites.

Where the remediation / redevelopment of the site will involve waste management issues we offer the following advice:

Waste on-site
The CL:AIRE Definition of Waste: Development Industry Code of Practice (version 2) provides operators with a framework for determining whether or not excavated material arising from site during remediation and/or land development works is waste or has ceased to be waste. Under the Code of Practice:

- excavated materials that are recovered via a treatment operation can be reused on-site providing they are treated to a standard such that they are fit for purpose and unlikely to cause pollution
- treated materials can be transferred between sites as part of a hub and cluster project
- some naturally occurring clean material can be transferred directly between sites

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically, and that the permitting status of any proposed on-site operations are clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

We recommend that developers should refer to:

- the position statement on the Definition of Waste: Development Industry Code of Practice
- The waste management page on GOV.UK

Waste to be taken off-site
Contaminated soil that is (or must be) disposed of is waste. Therefore, its handling, transport, treatment and disposal are subject to waste management legislation, which includes:

- Duty of Care Regulations 1991
- Hazardous Waste (England and Wales) Regulations 2005
- Environmental Permitting (England and Wales) Regulations 2016
- The Waste (England and Wales) Regulations 2011

Developers should ensure that all contaminated materials are adequately characterised both chemically and physically in line with British Standard BS EN 14899:2005 'Characterization of Waste - Sampling of Waste Materials - Framework for the Preparation and Application of a Sampling Plan' and that the permitting status of any proposed treatment or disposal activity is clear. If in doubt, the Environment Agency should be contacted for advice at an early stage to avoid any delays.

If the total quantity of hazardous waste material produced or taken off-site is 500kg or greater in any 12 month period, the developer will need to register with us as a hazardous waste producer. Refer to the hazardous waste pages on GOV.UK for more information.

Dewatering
Dewatering is the removal/abstraction of water (predominantly, but not confined to, groundwater) in order to locally lower water levels near the excavation. This can allow operations to take place, such as mining, quarrying, building, engineering works or other operations, whether underground or on the surface. Any dewatering activities on-site could have an impact upon local wells, water supplies and/or nearby watercourses and environmental interests. This activity was previously exempt from requiring an abstraction licence. Since 1 January 2018, most cases of new planned dewatering operations above 20 cubic metres a day will require a water abstraction licence from us prior to the commencement of dewatering activities at the site. More information is available on gov.uk:

https://www.gov.uk/guidance/water-management-apply-for-a-water-abstraction-or-impoundment-licence#apply-for-a-licence-for-a-previously-exempt-abstraction.

Regulatory position statements

Discharges from dewatering to surface water or groundwater will require an Environmental Permit unless you can meet the conditions of the RPS or exemptions or exclusions for groundwater activities. The following Regulatory Position Statement will apply: 'Temporary dewatering from excavations to surface water.'
https://www.gov.uk/government/publications/temporary-dewatering-from-excavations-to-surface-water

Please note that this response is based on the information provided at this time and if this changes in the future, we would need to consider our position again. If you have any further questions, please do not hesitate to contact me.

Many thanks,

[redacted]
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