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Environment Agency

Manchester City Council - Development Control
Manchester, M60 2JT

Reference: SO-2025-125476/03
Customer reference: 144791/FO/2025
20 July 2026

Phased development comprising: (a) Partial removal of existing structures and erection of two buildings comprising purpose-built student accommodation (sui generis), one of 50 storeys and one of 17 storeys with an 8-storey link, together with associated amenity space, external landscaping, highways works, and change of use of the Pendulum Hotel to purpose-built student accommodation; and (b) Removal of remaining existing structures and erection of two buildings comprising purpose-built student accommodation (sui generis), one of 33 storeys and one of part-24 and part-8 storeys with a 1-storey link, together with associated amenity space, external landscaping, and highways works.

Weston Student Halls And Pendulum Hotel 78 Sackville Street Manchester M1 3BB

Dear Jennifer Atkinson,

Thank you for reconsulting the Environment Agency (EA) on the above application on 2 July 2026. In our previous response, SO-2025-125476/02 (dated 02 April 2026) we had maintained our objection due to the absence of an adequate Flood Risk Assessment (FRA). The applicant has provided further information for review.

Environment Agency Position

As part of this reconsultation we have reviewed the following information:

- Updated flood storage calculations and associated flood extent drawings.
- Drawing No. 3341-CIV-XX-XX-D-C-30102: Proposed River Flood Extent

The additional information partially addresses our previous concerns. We acknowledge that the applicant has now provided flood storage calculations which indicate that the proposed development is capable of providing approximately 643m³ of flood storage and that this represents an increase in flood storage when compared to the existing situation. However, the information submitted does not satisfactorily address all of our previous concerns and **our objection therefore remains.**

Reason
Paragraph 181 of the National Planning Policy Framework (NPPF) states that development should only be allowed in areas at risk of flooding where it can be demonstrated that the development will be safe for its lifetime and will not increase flood risk elsewhere. Similarly, Policy EN14 (Flood Risk) of the Manchester Core Strategy seeks to ensure that development appropriately addresses flood risk and does not increase flood risk elsewhere.

Whilst the submitted information demonstrates that compensatory flood storage volume may be available within the site, insufficient information has been provided to demonstrate that the compensatory storage will function effectively during flood events.

Before we can remove our objection regarding flood storage compensation, we ask the applicant to confirm that the proposed compensatory storage is provided on a level for level basis and to demonstrate that floodwaters will naturally and freely access the compensatory storage area identified on Drawing No. 3341-CIV-XX-XX-D-C-30102.

The information submitted does not adequately demonstrate that:

- compensatory flood storage is provided on a level for level basis;
- floodwaters will naturally access the compensatory storage area during flood events; and
- the proposed compensatory storage area will function hydraulically as part of the floodplain.

We also note that previous submissions proposed a retaining wall as part of the development. Such a feature has the potential to impede flood flows, alter flood flow routes and reduce floodplain connectivity. The applicant should therefore confirm whether a retaining wall remains part of the proposed development and, if so, provide evidence demonstrating that it will not:

- restrict floodwaters from accessing the compensatory storage area;
- disrupt existing flood flow routes; or
- increase flood risk elsewhere.

In addition, information previously requested regarding the demolition works proposed above the existing culvert remains outstanding. Sufficient information should be provided to demonstrate that the demolition and construction works will not adversely affect the integrity, operation or maintenance of the culvert and will not increase flood risk.

Until these matters have been satisfactorily addressed, we consider that the FRA remains inadequate and therefore maintain our objection to the application.

Overcoming our objection
To overcome our objection, the applicant should submit a revised FRA and supporting information which:

- demonstrates that compensatory flood storage is provided on a level for level basis;
- demonstrates that floodwaters can naturally and freely access the compensatory storage area during flood events;
- confirms whether a retaining wall forms part of the development and, if so, demonstrates that it will not adversely affect floodplain connectivity, flood flow routes or increase flood risk elsewhere; and
- provides the outstanding information relating to the proposed demolition works above the existing culvert.

If this information cannot be provided, we are likely to maintain our objection. Please reconsult us if a revised FRA is submitted and we will respond within 21 days of reconsultation.

Advice to LPA
If you are minded to approve this application contrary to our flood risk objection, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2024. This Direction prevents you from granting planning permission without first referring the application to the Secretary of State for Housing, Communities and Local Government (via the National Planning Casework Unit) to give them the opportunity to call-in the application for their own determination. This process must be followed unless we are able to withdraw our objection to you in writing.

A failure to follow this statutory process could render any decision unlawful and the resultant permission vulnerable to legal challenge.

Please note that this response is based on the information available at this time. Should further information become available, we may need to review our position. If you have any questions, please do not hesitate to contact us.

Yours faithfully,

[redacted]
Planning Specialist
[redacted]