Environment Agency

Manchester City Council - Development Control

Reference: SO-2025-125476/02
Customer reference: 144791/FO/2025
02 April 2026

Dear Jennifer Atkinson,

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

Thank you for reconsulting the Environment Agency (EA) on the above application on 18 March 2026. In our previous consultation response, SO/2025/125476/01 (dated 7 January 2026), we had objected 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 document:

- Technical Note – Response to Environment Agency Consultation. Prepared by CIVIC Plus Limited, dated February 2026. Ref: 3341

The document listed above does not satisfactorily address our earlier concerns and our objection therefore remains.

We acknowledge the clarification provided regarding finished floor levels. The proposed approach for the bin store is acceptable, and we note that plinths have been introduced within the plant rooms to provide 600 mm freeboard to essential equipment.

However, the key requirements of a site-specific Flood Risk Assessment, as set out in paragraphs 20 and 21 of the Flood Risk and Coastal Change Planning Practice Guidance, remain unmet. We understand that an area of 1,146 square metres within the site could provide floodwater storage, but the FRA still does not quantify the

volume of floodwater that will be displaced during the 1 in 100 year plus 35% percent climate change event. As the Manchester Ship Canal modelling places the site within this flood extent, the displaced volume must be calculated and matched by like for like volume compensation to demonstrate no increase in flood risk elsewhere.

The submission also does not assess the implications of the proposed retaining wall on flood flow routes. Confirmation is required that the structure will not restrict flows or increase flood risk elsewhere.

Until the displaced volume, compensatory storage volume, and flow routing impacts are fully assessed, the FRA remains inadequate and our objection cannot be removed.

Advice to LPA

If you are minded to approve this application for major development 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 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.

Yours faithfully,

[redacted]
Planning Specialist
[redacted]