8 June 2026

[redacted]

Jennifer Atkinson
Manchester City Council
Town Hall Extension
Lloyd Street
Manchester
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Our ref: 03517

Dear Jennifer

144791/FO/2025 WESTON HALLS AND PENDULUM HOTEL - RESPONSE TO CONSULTEE COMMENTS

We write on behalf of iQ Student Accommodation ('the Applicant') in response to consultee comments received by the Environment Agency ('EA') and Building Safety Regulator ('BSR') (previously HSE) during the determination of above referenced application. This letter also provides additional context regarding the options considered relating to the affordable housing contribution.

Environment Agency Comments

The EA object to the proposed development regarding concerns over whether the information provided adequately assesses whether the proposed development will increase flood risk elsewhere (responses from 07 January 2026 and 02 April 2026). With this, the EA advise that finished floor levels must be a minimum of 600mm above the 1 in 100-year flood level +35% climate change.

To address these comments, a technical note and revised Flood Risk Assessment and Drainage Strategy was prepared by Civic and issued to the EA via Manchester City Council ('MCC') on 17 March 2026. This confirmed that all finished floor levels within the flood extents have been raised above the design flood + 600mm freeboard level, except for the bin store that has been designed to allow water ingress. The mitigation measures have been coordinated thoroughly with the design team. In the case of the bin store, this is a less vulnerable use that does not affect critical infrastructure or operational use of the development. The bin store is located within the site in line with its vulnerability classification, allowing remaining site uses to be in areas of lower fluvial flood risk. The entrance to the bin store is situated 140mm above the design flood level and ramps up to be in excess of 600mm above the design flood level. Under the National Planning Policy Framework (NPPF) this is deemed acceptable with the incorporation of flood resilience measures.

On 2nd April 2026 the EA confirmed that while some elements are now acceptable (such as the finished floor levels, the bin store approach, and plant room plinths), the Flood Risk Assessment fails to calculate how much floodwater would be displaced during a major flood event to demonstrate that this would be fully offset with equivalent

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compensatory storage. It also does not assess whether the proposed retaining wall could obstruct flood flows or increase risk elsewhere. As a result, the EA maintained its objection.

In response to this, Civic reviewed the proposed flood compensation measures to quantify floodwater displacement during the 1 in 100-year plus 35% climate change event and demonstrate that the development would not increase flood risk elsewhere. The review identified that the proposed scheme did not provide sufficient compensatory flood storage to accommodate displaced floodwater during the design event.

To address this, Civic, Simpson Haugh and Planit IE coordinated minor amendments to the landscape design, through the introduction of a swale and localised level changes, to direct surface water to the lowest areas of the site and provide sufficient compensatory flood storage to accommodate. The incorporation of this design feature ensures that adequate flood storage capacity for all flood levels up to and including the 1 in 100-year plus 35% climate change flood event, ensuring no increase in flood risk elsewhere. The supporting technical note (3341-CIV-XX-XX-R-C-30002_EA Comments Response), drawings (3341-CIV-XX-XX-R-C-30101 & 3341-CIV-XX-XX-R-C-30102) and Flood Risk Assessment and Drainage Strategy (3341-CIV-XX-XX-R-C-30001-P03) submitted alongside this letter confirm the position in respect of compensatory flood storage.

Therefore, all matters have now been addressed to resolve comments from the EA.

Revised Architectural and Landscaping Information

In response to comments from the EA the relevant architectural and landscape drawings have been updated to reflect changes made to the scheme discussed above. In addition, the landscaping scheme is now shown on an indicative basis, with the final detailed design to be submitted for approval pursuant to the relevant planning condition. This indicative approach provides flexibility to accommodate the requirements of the Building Safety Act Gateway 2 process, particularly if fire tender access is required into the courtyard off Charles Street. This is in response to comments from the BSR regarding the access distance between the fire tender parking area and the protected route leading to the firefighting shaft and the base of the firefighting stair, notwithstanding that Greater Manchester Fire and Rescue Service has confirmed that the proposed approach is acceptable (as per information submitted to MCC on 17 March 2026).

The following condition is proposed:

> *'Prior to the first occupation of the development, within the relevant phase, hereby approved details of a hard and soft landscaping scheme (including appropriate materials specifications), within that phase, shall be submitted for approval in writing by the City Council as Local Planning Authority. The approved scheme shall be implemented prior to the first occupation of the development.'*

Given the indicative nature of the landscaping scheme, it is also proposed that a planning condition relating to the reassessment of the Biodiversity Net Gain value of the finalised landscaping scheme be attached to any decision.

The revised suite of drawings and supporting information is detailed in **Annex 1.**

Affordable Housing Contribution – Additional Context

Further to the information provided in the submitted Planning Statement (December 2026) with regards to the affordable housing contribution, it is relevant to add that during early pre-application discussions with the Council regarding the proposed development, consideration was given to whether the scheme could accommodate a standalone affordable housing building alongside the proposed purpose-built student accommodation. At the Council's request, the Applicant explored this option and engaged with relevant parties to understand the practical, operational and viability implications of such an approach.

This review identified a number of challenges associated with delivering affordable housing on the site, including the efficient use of a constrained city-centre site, the relationship with the proposed purpose-built student accommodation development and the viability of delivering a separate affordable housing block at the scale necessary to operate effectively in a tall-building format. Feedback received from a Registered Provider also indicated limited appetite for taking forward affordable housing in the form and location under consideration. Having considered the available options, it was concluded that on-site affordable housing provision would not represent a realistic or deliverable solution in this instance.

Conclusion

We trust that the response provides clarity on the applicant's approach to addressing relevant consultee comments, the updates made to the suite of architectural and landscape information, and the additional context regarding the affordable housing contribution. Should you have any queries in relation to the refinements made, please do not hesitate to contact me.

Yours sincerely



Olivia Carr
Director



Annex 1: Revised Architectural and Landscape Drawings

Architectural Drawings (prepared by Simpson Haugh)

Drawing Number	Drawing Title	Revision
Proposed Plans		
10346-SHA-Z0-A-B5D8-G100-PL-XX-001	Site Wide Proposed Site Location Plan	P02
10346-SHA-Z0-A-B5D8-G100-PL-XX-002	Site Wide Proposed Site Phasing Plan	P02
10346-SHA-Z0-A-B5D8-G100-PL-B1-001	Site Wide Proposed Site Plan Basement Level	P02
10346-SHA-Z0-A-B5D8-G100-PL-00-001	Site Wide Proposed Site Plan Level 00	P02
10346-SHA-Z0-A-B5D8-G100-PL-01-001	Site Wide Proposed Site Plan Level 01	P02
10346-SHA-Z0-A-B5D8-G100-PL-02-001	Site Wide Proposed Site Plan Level 02	P02
10346-SHA-Z0-A-B5D8-G100-PL-03-001	Site Wide Proposed Site Plan Level 03	P02
10346-SHA-Z0-A-B5D8-G100-PL-04-001	Site Wide Proposed Site Plan Level 04-07	P02
10346-SHA-Z0-A-B5D8-G100-PL-08-001	Site Wide Proposed Site Plan Level 08	P02
10346-SHA-Z0-A-B5D8-G100-PL-09-001	Site Wide Proposed Site Plan Level 09-10	P02
10346-SHA-Z0-A-B5D8-G100-PL-11-001	Site Wide Proposed Site Plan Level 11	P02
10346-SHA-Z0-A-B5D8-G100-PL-12-001	Site Wide Proposed Site Plan Level 12-16	P02
10346-SHA-Z0-A-B5D8-G100-PL-17-001	Site Wide Proposed Site Plan Level 17	P02
10346-SHA-Z0-A-B5D8-G100-PL-18-001	Site Wide Proposed Site Plan Level 18-20	P02
10346-SHA-Z0-A-B5D8-G100-PL-21-001	Site Wide Proposed Site Plan Level 21	P02
10346-SHA-Z0-A-B5D8-G100-PL-22-001	Site Wide Proposed Site Plan Level 22-23	P02
10346-SHA-Z0-A-B5D8-G100-PL-24-001	Site Wide Proposed Site Plan Level 24	P02
10346-SHA-Z0-A-B5D8-G100-PL-25-001	Site Wide Proposed Site Plan Level 25-30	P02
10346-SHA-Z0-A-B5D8-G100-PL-31-001	Site Wide Proposed Site Plan Level 31	P02
10346-SHA-Z0-A-B5D8-G100-PL-32-001	Site Wide Proposed Site Plan Level 32	P02
10346-SHA-Z0-A-B5D8-G100-PL-33-001	Site Wide Proposed Site Plan Level 33	P02
10346-SHA-Z0-A-B5D8-G100-PL-34-001	Site Wide Proposed Site Plan level 34-49	P02
10346-SHA-Z0-A-B5D8-G100-PL-RF-001	Site Wide Proposed Site Plan Roof Level	P02
Proposed Elevations		

Drawing Number	Drawing Title	Revision
10346-SHA-Z0-A-B5D8-G100-EL-EN-001	Site Wide Proposed Elevation North - Charles Street	P02
Proposed Sections		
10346-SHA-Z0-A-B5D8-G100-SE-EE-001	Site Wide Proposed Site Section EE	P02
Phase A		
Site Plans		
10346-SHA-ZA-A-B5D8-G100-PL-B1-001	Phase A Site Plan Basement Level	P02
10346-SHA-ZA-A-B5D8-G100-PL-00-001	Phase A Site Plan Level 00	P02
10346-SHA-ZA-A-B5D8-G100-PL-01-001	Phase A Site Plan Level 01	P02
10346-SHA-ZA-A-B5D8-G100-PL-02-001	Phase A Site Plan Level 02	P02
10346-SHA-ZA-A-B5D8-G100-PL-03-001	Phase A Site Plan Level 03	P02
10346-SHA-ZA-A-B5D8-G100-PL-04-001	Phase A Site Plan Level 04	P02
10346-SHA-ZA-A-B5D8-G100-PL-05-001	Phase A Site Plan Level 05	P02
10346-SHA-ZA-A-B5D8-G100-PL-08-001	Phase A Site Plan Level 08	P02
Design and Access Statement		
10346-SHA-RP-B5D8-DAS-001	Design and Access Statement	P02

Landscape Drawings (prepared by Planit-IE)

Drawing Ref	Drawing Title	Revision No.
3489-PLA-XX-XX-DR-L-0001	Indicative General Arrangement Plan	P13
3489-PLA-XX-XX-DR-L-0002	Indicative General Arrangement Plan Phase-1	P08
3489-PLA-XX-XX-DR-L-0003	Indicative General Arrangement Plan Phase-2	P07
3489-PLA-XX-XX-DR-L-1000	Indicative Hardwork General Arrangement	P06
3489-PLA-XX-XX-DR-L-2000-	Indicative Softwork General Arrangement	P08

Other Application Information

Document Ref	Document Title	Revision No.
3489-ID-007-01	Blue and Green Infrastructure Response (prepared by Planit)	P02