Manchester City Council
Development Control
PO Box 488
Manchester
Lancashire
M60 2JT

Our ref: SO/2025/125476/01
Your ref: 144791/FO/2025

Date: 07 January 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 consulting the Environment Agency (EA) on the above application on 19 December 2025.

Environment Agency Position

In the absence of an adequate flood risk assessment (FRA) we object to this application and recommend that planning permission is refused.

Reason(s)

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 20 to 21 of the Flood Risk and Coastal Change Planning Practice Guidance and its site-specific flood risk assessment checklist. The FRA does not therefore adequately assess whether the development will increase flood risk elsewhere. In particular, the FRA fails to:

- Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for the 1 in 100-year + 35% climate change flood event. Consequently, the development proposes inadequate
    - Raised finished floor levels. Finished floor levels must be a minimum of 600mm above the 1 in 100-year flood level + 35% climate change.

Overcoming our objection

To overcome our objection, the applicant should submit a revised FRA which addresses the points highlighted above.

If this cannot be achieved, we are likely to maintain our objection. Please re-consult us if a revised FRA is submitted and we will respond within 21 days of re-consultation.

Additional Comments

While we currently object due to an inadequate Flood Risk Assessment, we welcome the inclusion of sustainable design measures within the proposal. The creation of multifunctional greenspace (drawing DR-L-0001/P07) and the use of sustainable urban drainage solutions (rain gardens, green roofs, swales, permeable paving) as indicated in the Environmental Statement (Turley, Dec 2025) and drainage strategy (Civic, Dec 2025) are positive features. These measures should ensure site surface water drainage is filtered before discharging into the adjoining River Medlock to the south of the site.

The submitted plans indicate that the proposed demolition works will take place over, or in close proximity to, a culverted section of the River Medlock. To ensure the culvert is adequately protected during the works, we request that the applicant undertakes a ground survey to determine what weight of plant can be safely used on site. Please note that the riparian owner would be responsible for any repairs to the culvert should it be damaged during the works.

Any works within 8 metres of a main river will also require a Flood Risk Activity Permit under the Environmental Permitting Regulations.

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]

End