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Date: 23rd December 2025

Dear Jennifer

Application 144791/FO/2025 - 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 GMAAS on the above planning application.

The application site does not contain any listed buildings, Scheduled Monuments or any Registered Parks and Gardens, although it is of some archaeological interest. In particular, the footprint of a late 18th-century extension to Garrett Mill complex, the first powered textile mill in Manchester, lies within the application site, together with the former New Garratt Print Works and the later Medlock Oil Works, any below-ground remains of which would be of archaeological interest. Whether any such remains survive intact following the development of the Manchester Conference Centre and Weston Hall in the late 20th century has yet to be established, although it is entirely possible that deeply cut historic structures such as waterwheel pits or dye vats may persist below ground. There is also potential for elements of the water-management system that served Garratt Mill to survive below ground, which would similarly warrant recording archaeologically.

The application is supported by an archaeological desk-based assessment prepared by TEP in December 2025. The detailed desk-based assessment describes the historical development of the application site, supported by key historic map extracts. Following consultation with GMAAS, it utilises GM Historic Environment Record data and 'grey literature' reports on relevant archaeological investigations. The report concludes that the application site has potential to contain archaeological remains of interest that warrant further archaeological investigation in advance of development groundworks.

GMAAS agrees with this conclusion drawn from the desk-based study and recommends that the site is subject to intrusive archaeological investigation in advance of development groundworks. In the first instance, archaeological monitoring and recording should be implemented towards the completion of the demolition works, specifically during the removal of the floor slab to the Manchester Conference Centre and Weston Hall, to establish the presence or absence of archaeological remains. This would enable the requirement and scope of an appropriate archaeological mitigation strategy to be devised, which would likely involve further archaeological monitoring or a 'strip, map and record' evaluation, in line with the guidance provided by the National Planning Policy Framework. GMAAS accepts that any archaeological remains that do exist are not going to be of national, but of regional or local significance. As such, GMAAS would be content to see the archaeological investigation secured through a condition worded as follows:

'No development works (excluding demolition) shall take place until the applicant or their agents or their successors in title has secured the implementation of a programme of archaeological works in accordance with a Project Design that has been submitted to and approved in writing by the local planning authority. The Project Design shall cover the following:

1. A phased programme and methodology of investigation and recording to include:
- archaeological monitoring and recording during demolition (removal of the floor slab);
- pending the results of the above, further archaeological investigation (subject to updated Project Design).

2. A programme for post-investigation assessment to include:
- production of a final report on the results of the investigations and their significance.

3. Deposition of the final report with the Greater Manchester Historic Environment Record.

4. Dissemination of the results of the archaeological investigations commensurate with their significance.

5. Provision for archive deposition of the report and records of the site investigation.

6. Nomination of a competent person or persons/organisation to undertake the works set out within the approved Project Design.

Reason: In accordance with NPPF policy 218: To record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) and to make this evidence (and any archive generated) publicly accessible, pursuant to policy DM1 of the Core Strategy for the City of Manchester.'

All archaeological work should be undertaken by a suitably qualified and experienced archaeological contractor, funded by the applicant. GMAAS will approve the Project Design and also monitor the implementation of the archaeological works on behalf of Manchester City Council.

Yours sincerely

[redacted]

[redacted] **BA FSA**
Heritage Management Director
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