

18 February 2022
Delivered by email

The Planning Inspectorate
Temple Quay House
2 The Square
Bristol
BS1 6PN

Ref: WATM3006

Dear Sir/Madam

**APP/B4215/W/21/3286831 - UNION OF SHOP DISTRIBUTIVE & ALLIED WORKERS, 188 WILMSLOW ROAD,
MANCHESTER - APPEAL AGAINST MANHCESTER CITY COUNCIL'S REFUSAL OF PLANNING APPLICATION
129020/FO/2020**

On behalf of the Union of Shop, Distributive and Allied Workers (USDAW), Watkin Jones Group Ltd and Wilmslow Road Manchester Ltd (collectively the 'Appellant'), we are pleased to enclose the Appellant's full Statement of Case relating to the above referenced appeal, in accordance with the Planning Inspectorates' Procedural Guide – Planning Appeals - England, and the agreed submission deadline of 18 February 2022¹.

The Appellant's Statement of Case comprises the following:

- Principal Hearing Statement of Case, prepared by Mr Stephen Bell (Turley)
- Appendix 1 – Townscape and Visual Impact Appeal Statement, prepared by Ms Joanna Ede (Turley)
- Appendix 2 – Architecture and Design Appeal Statement, prepared by Mr Tim Groom (TGA)
- Appendix 3 – Heritage Appeal Statement, prepared by Mr Stephen Levrant (Heritage Architecture Ltd)
- Appendix 4 – Arboricultural Report, prepared by Mr Glyn Thomas (Cheshire Woodlands)
- Appendix 5 – Highways Technical Note, prepared by Focus Transport Planning
- Appendix 6 – Manchester Student Demand Study, an updated report prepared by Knight Frank
- Appendix 7 – University of Manchester Letter of Support, dated 18 December 2020
- Appendix 8 – Church Inn (LPA ref. 125654/FO/2019), Officer Report to Planning Committee

¹ Confirmed via email from Planning Inspectorate (PINS) to Thomas Lord (Turley), dated 26 January 2022.

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- Appendix 9 – Email correspondence from Manchester City Council relating to financial contributions, dated 2 February 2022
- Appendix 10 – Great Marlborough Street (LPA ref. 121252/FO/2018), Officer Report to Planning Committee
- Appendix 11 – New Wakefield Street (LPA ref. 117054/FO/2017), Officer Report to Planning Committee
- Appendix 12 – Report of Strategic Director (Growth & Development) to Manchester City Council Executive, dated 13 November 2019
- Appendix 13 – Report of Strategic Director (Growth & Development) to Manchester City Council Executive, dated 9 December 2020

These documents collectively provide the Appellant's full Appeal Statement of Case.

As originally outlined in the Statement of Case by the Appellant submitted alongside the appeal (dated 11 November 2021), as well as subsequent correspondence², the Appellant maintains its position that an inquiry represents the most appropriate procedure for this appeal to properly consider all the relevant evidence. An inquiry is justified given the substantial scale of the proposals, the multiplicity and diverse matters of relevance and their complexity. An Inquiry is also necessary to ensure that all relevant technical consultants and Officers of the Council have the opportunity to present evidence. Furthermore, the nature and location of the proposals mean the scheme is of significant local interest, as evidenced by the number of representations made to the application.

Regardless of whether the appeal is to be heard by hearing or inquiry, we can confirm that the Appellant will be represented by Leading and Junior Counsel.

I trust you are in receipt of all information needed to enable the appeal to be fully validated. Please do not hesitate to contact me or my colleague Stephen Bell (stephen.bell@turley.co.uk) if you require any further details.

Yours sincerely,



Thomas Lord
Planner

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² Letter from Turley (Jenny Fryer) to Ms Helen Skinner (PINS), dated 19 November 2021 and Email from Turley (Stephen Bell) to Ms Helen Skinner (PINS), dated 22 November 2021.