# 9 Knowsley Street, Manchester M8 8QN

## PLANNING AND USE JUSTIFICATION STATEMENT

*Proposed change of use to a wholesale cash and carry (sui generis) with ancillary butcher, bakery and retail sales*

**STATUS AND RELIANCE**

This supporting planning statement has been prepared on the basis of material supplied by the applicant and the appointed agent, together with Manchester City Council correspondence and identified public planning sources. That material has not been independently verified, the premises have not been inspected, and the applicant's operational and trading records have not been audited.

This statement is not a statement of truth, a statutory declaration, or evidence of fact. It does not certify the lawful use of the premises, determine the correct use class, provide a legal opinion on enforcement immunity, or constitute legal advice.

The factual and operational matters relied upon are to be verified and adopted by the applicant. The applicant provides a separate signed Statement of Truth, accompanying the application, confirming those matters. Where this statement records a matter as advised by the applicant or agent, it is recorded on that basis.

## 1. Purpose of this statement

This statement accompanies an application for the change of use of the ground-floor premises at 9 Knowsley Street, Manchester, to a wholesale cash and carry (sui generis), with ancillary butcher, bakery and retail sales elements subordinate to that principal use.

By email dated 10 September 2026, Manchester City Council's Senior Planner confirmed that the Council would be supportive in principle of a wholesale cash and carry use (sui generis) at the premises, provided that any retail sales element remains clearly ancillary and subordinate to the principal wholesale operation, ensuring that the primary character and function of the premises as a cash and carry business is maintained. The Council indicated that a proposal extending beyond the scope of a primarily wholesale cash and carry function would not attract that support.

This application is framed squarely on the basis the Council has indicated it would support. The wholesale cash and carry is the principal use and the primary character of the premises; the retail sales element is a single defined and subordinate zone; and the applicant offers conditions to secure that relationship for the life of the permission.

The Council further confirmed that an application on that basis would not be retrospective, as the proposed operation is not the current operation. This application is therefore made prospectively. The applicant does not seek to regularise the present arrangement; the application proposes a materially different operation, to be implemented from the date identified in the application.

The proposed use description is: “Change of use of the ground floor to a wholesale cash and carry (sui generis) with ancillary butcher, bakery and retail sales, together with a front canopy and associated signage.”

## 2. Planning position and approach to historic use

Manchester City Council's early correspondence referred to the last planning record as relating to a wholesale warehouse and suggested a likely Class B8 context. The Council's Principal Development Compliance Officer subsequently clarified that the 1992 permission identified on the system was for elevational alterations and, in his view, did not establish the current lawful use. The Council also confirmed that it does not hold a definitive record establishing the current lawful use of the premises.

Accordingly, this statement does not assert that a lawful B8 use has been conclusively established, and the application is not made on the basis that any particular lawful use exists. The historic material is used more narrowly to identify the character of the premises and its surroundings, and to demonstrate that a wholesale cash and carry operation is consistent with the long-established commercial character of the building and the area.

Any separate Certificate of Lawfulness or enforcement-immunity case would require its own evidential assessment and is outside the scope of this statement.

## 3. Site and historic commercial context

The site lies within the Strangeways employment area close to Cheetham Hill Road. Historic Ordnance Survey mapping (Annex B, Figure 1) records the block bounded by Knowsley Street, Fern Street and Stocks Street almost entirely as warehouses in the 1960s, within a surrounding area of factories and works. This is consistent with Manchester's present description of Strangeways as a historically industrial and warehouse employment area.

Street-level imagery from June 2009 (Annex B, Figure 2) shows Influence occupying the building with a clearly delineated “SHOWROOM” frontage. A defined showroom does not, by itself, displace a storage and distribution character. Where the accompanying evidence demonstrates that a showroom was used by trade buyers to inspect samples or ranges, with orders then supplied from warehouse stock, it is capable of operating as the sales function of a wider wholesale and distribution undertaking rather than as an unrestricted shop. The showroom occupied part of the Knowsley Street frontage, with the remainder of the building presenting as warehouse accommodation.

Immediately prior to the current occupation commencing in around July 2025, the ground floor was in an open-plan warehouse condition, with no fit-out or trading arrangement in place. That position is confirmed in the Statement of Truth accompanying this application. Street-level imagery of the premises (Annex B, Figure 2) shows no window display or retail-style advertising other than the showroom signage, which is consistent with a warehouse rather than a shop presentation.

The rear of the premises provides useful corroborative physical evidence. Street-level imagery shows signs marked “DELIVERIES” and “LOADING BAY KEEP CLEAR” (Annex B, Figure 3), supporting an active goods-movement and servicing function. The existing floor plan (drawing 20260807_CS_D_00_A_100101 rev 2) identifies the rear loading area, waste and collection area and gated entries serving that function.

The planning unit also requires careful treatment. Site evidence records separate first-floor commercial occupation associated with S&K Commercial Properties. The application relates to the ground-floor premises only, and the planning unit analysis distinguishes the ground floor from any separate upper-floor occupation.

## 4. The proposed operation: principal wholesale use with ancillary elements

The proposed operation responds directly to the structure the Council has indicated it would support. The principal use is a wholesale cash and carry. The butcher, bakery and retail sales elements are ancillary and subordinate to that principal use, and are not proposed as separate or independent businesses.

**PRINCIPAL AND ANCILLARY STRUCTURE**

Principal use: wholesale cash and carry, characterised by bulk and multipack purchasing, wholesale shelving and stockholding, trade and business customers, deliveries, collections and rear servicing.

Ancillary elements: butcher, bakery production and a defined retail sales area, each subordinate to the wholesale operation, operating as part of the same business and not as separate independent businesses.

The applicant has signed a Client Declaration and Operating Commitment (Naser Zakrya, Owner, Eagle Revive Ltd, 11 September 2026) confirming that the wholesale cash and carry will remain the principal activity, that the retail, butcher and bakery elements will remain secondary and will not operate as separate independent businesses, that the premises will retain a clear wholesale and warehouse character through stockholding, bulk sales, deliveries and servicing, and that the business will operate in accordance with the final planning submission and any conditions imposed.

### Floorspace

The proposed floor plan (drawing 20260807_CS_D_00_A_200102) identifies the following areas:

| Area | Approx. sqm | Role |
|---|---|---|
| Proposed cash and carry area | 208 | Principal use – wholesale |
| Wholesale break-bulk positions (2) | 10 | Principal use – wholesale |
| Proposed retail sales area | 39 | Ancillary retail sales |

| Area | Approx. sqm | Role |
|---|---|---|
| Proposed butcher area | 15 | Production / preparation |
| Proposed bakery production area | 15 | Production / preparation |
| Back of house | 16 | Supporting |
| Existing storage | 6 | Supporting |
| WC and lobby | 3 | Supporting |

The ancillary retail sales element is the 39 sqm zone identified at the Knowsley Street frontage. The butcher and bakery areas are production and preparation space, not retail sales floorspace; goods prepared in those areas are supplied through both the wholesale operation and the ancillary retail zone. On that basis, of approximately 287 sqm of trading floorspace, the ancillary retail sales area represents approximately 14 per cent, and the wholesale cash and carry area, including the two break-bulk positions, represents approximately 76 per cent, the balance comprising butcher and bakery production.

Taking the back of house, storage and other supporting areas into account as serving the wholesale function, the wholesale and wholesale-supporting floorspace represents approximately 78 per cent of the gross internal ground-floor area, with ancillary retail sales at approximately 13 per cent.

These areas are as shown on the proposed floor plan submitted with this application.

## Ancillary retail and the trade counter distinction

The planning distinction between a genuine ancillary sales element and a retail sales area turns on the character of the operation as a whole rather than on the point at which payment is taken, or on whether customers move through the trading floor. Trade customers at a cash and carry necessarily browse and select from wholesale racking, and that alone does not make an operation retail. What matters is the customer base, the basis on which goods are sold, the quantities in which they are supplied, and the extent to which any sales element is small, discrete and subordinate to the principal use.

The proposed ancillary retail element is accordingly provided as a single discrete and clearly demarcated zone of approximately 39 sqm at the Knowsley Street frontage, physically distinguishable from the wholesale racking and stockholding, rather than as retail display distributed through the trading floor. That zone is identified on the proposed floor plan, and the applicant would accept a condition restricting ancillary retail sales to the area so identified.

Two small break-bulk positions, of approximately 7 sqm and 3 sqm, are located within the wholesale area and are identified as such on the proposed floor plan. These provide part-case and smaller-quantity sales of lines held in bulk within the adjacent wholesale racking. They form part of the wholesale operation rather than a separate retail activity, and are distinguishable from the ancillary retail zone both in function and in the goods offered.

## How trade and individual purchasing are distinguished

The distinction between the principal wholesale operation and the ancillary retail element is drawn by reference to the customer and the basis of sale, not by the physical act of browsing.

Entry to the premises is not restricted, and no membership is required in order to enter. The distinction operates at the point of sale. Sales from the wholesale racking and from the two break-bulk positions are made to wholesale customers, being trade and business customers such as those holding a registered trade account, in case, multipack or bulk quantities. Sales to customers other than wholesale customers are confined to the 39 sqm ancillary retail zone.

A trade registration point is provided at the Knowsley Street entrance, identified on the proposed floor plan, at which trade and business customers may register. The registration and account arrangements are modelled on those operated by comparable cash and carry businesses in the surrounding area, including Ades Cash & Carry, 320 Great Cheetham Street East, Salford, Manchester M7 4UJ.

The registration arrangement is not relied upon as determining the use class, and is not a condition of entry to the premises. It is an operational control evidencing the trade orientation of the business and the basis on which wholesale sales are made.

The two break-bulk positions accordingly do not represent consumer retail sales. They provide part-case and smaller-quantity supply, to wholesale customers, of lines held in bulk within the adjacent wholesale racking, which is a normal feature of wholesale supply to smaller trade customers.

That arrangement is capable of being secured by condition, and the applicant offers conditions to that effect at section 10. The conditions offered restrict the basis on which wholesale sales are made; they do not restrict entry to the premises.

For completeness, consideration was given to describing the proposal as a retail warehouse club within the meaning of article 3(6)(k) of the Town and Country Planning (Use Classes) Order 1987 as amended. That description is not pursued, the Council having indicated that a wholesale cash and carry with ancillary retail is the appropriate and acceptable characterisation in this location.

## 5. Planning policy

The principal planning issue is the relationship between the proposed operation and the employment and wholesale function of Strangeways. Manchester Core Strategy Policy EC4 identifies the Strangeways Employment Area as suitable for the retention and growth of general industry, warehousing and distribution. Saved UDP Policy CC10 seeks to support the wholesale function of Strangeways and lower Cheetham Hill Road, including wholesale cash-and-carry and bulk distributive trades. The Manchester Employment Land Review 2025 continues to describe Strangeways as a mixed employment area that is historically industrial and warehouse in character and identifies its continuing distribution function.

A wholesale cash and carry is precisely the use that Policy CC10 expressly seeks to support, and that the ancillary butcher, bakery and retail elements are subordinate to, and do not displace, that protected function. On the Council's own indication of 10 September 2026, a proposal of that structure is supported in principle.

Because the proposed use is sui generis but contains an ancillary retail function, the application strategy considers the potential application of town-centre and sequential policy and does not assume a sequential assessment is unnecessary. The principal use proposed is wholesale, not retail, and the ancillary retail sales element is limited in scale and secured by the conditions offered below.

## 6. Relevant appeal decisions

Appeal decisions are fact-specific and do not determine this application. They are used to illustrate how comparable characterisation and policy questions have been approached. The decisions relied upon, and the propositions drawn from them, are set out at Annex A.

In summary, the Inspectorate has accepted that units may properly be characterised as storage and distribution with an ancillary trade counter notwithstanding that both tradespeople and the general public may purchase, provided the sales element remains small and ancillary to the primary storage and distribution purpose. The proposal is framed on that basis: a single, limited and clearly demarcated ancillary retail zone within a principally wholesale operation.

Local context is provided by the appeal at 46 Bury New Road, Manchester (APP/B4215/W/17/3174366), in which a hot-food takeaway was refused because the ground floor would cease to be available for the wholesale uses the development plan sought to maintain. The present proposal establishes a principally wholesale operation at the premises, consistent with the function that decision sought to protect. At 33–41 Cheetham Hill Road (APP/B4215/W/17/3186654), a hotel appeal was allowed after the Inspector concluded the proposal would not adversely affect the wholesale trade function of the area, indicating that the assessment under Policy CC10 includes the actual effect on the protected economic function. The differences between that case and the present one are noted at Annex A.

## 7. Access, servicing and highway considerations

Manchester has raised concerns about vehicle trips and the lack of off-street customer parking. This is a material issue and is addressed directly. A wholesale model does not inherently reduce highway impacts: bulk purchasing

may encourage members and trade customers to arrive by car or van and may involve larger loads than ordinary convenience shopping.

The rear loading area is a positive physical feature, providing a defined location for commercial deliveries and collections away from the principal frontage. The existing site plan (drawing 20260807_CS_D_00_A_100104) shows the rear area serving both the application building and the adjacent property; deliveries and collections would continue to be taken at the rear, and the applicant offers a condition controlling servicing hours and use of that area.

The proposed operation is trade-facing. Sales from the wholesale area are made to wholesale customers purchasing in case, multipack or bulk quantities, and sales to other customers are confined to the 39 sqm ancillary retail zone. The operation therefore differs materially in customer profile from an unrestricted retail use, in which casual and passing trade is unconstrained.

The applicant offers the following operating framework, which is capable of being secured by condition:

- All deliveries, collections and servicing to be taken at the rear loading area, and not at the Knowsley Street frontage.
- Servicing and delivery movements to be restricted to agreed hours.
- Opening hours to be restricted to agreed hours.
- No external display, storage or trading at the Knowsley Street or Fern Street frontages.
- Sales from the wholesale area limited to wholesale customers, with records maintained and available to the local planning authority on request.

The applicant is content to supply any further operational or highway information the Council considers necessary during the course of the application.

## 8. Canopy and signage

Drawing 20260807_CS_D_00_A_200102 identifies a proposed front canopy and non-illuminated front fascia and projecting signage. The signage is to be dealt with through the appropriate advertisement consent route. Signage design should reflect the trade orientation of the business; the applicant does not seek public-facing advertising of a scale or character associated with unrestricted retail.

## 9. Development compliance position

The premises are the subject of an active Development Compliance referral, and the Council has required the removal of advertisements it considers unauthorised, warning of potential prosecution under section 224 of the Town and Country Planning Act 1990. Those matters are being addressed directly and separately by the applicant and agent, including the Council's question as to responsibility for the current ground-floor use.

This statement does not advise on advertisement liability, prosecution risk, responsibility for any alleged breach, or the merits of any enforcement defence. As the Council has confirmed, this application is not retrospective: it proposes a change from the current position rather than seeking to regularise it.

## 10. Proposed conditions

The applicant would accept conditions securing the principal and ancillary structure, including:

1. A restriction that the premises shall be used as a wholesale cash and carry and for no other purpose, with the butcher, bakery and retail sales elements remaining ancillary and subordinate to that principal use.
2. A cap on ancillary retail sales floorspace, expressed as a maximum figure in square metres consistent with the approved plan, namely the 39 sqm retail zone identified at the Knowsley Street frontage.
3. A requirement that sales to customers other than wholesale customers be confined to the retail zone identified on the approved plan.
4. A requirement that sales from the wholesale area and the break-bulk positions be made only to wholesale customers, being trade and business customers such as those holding a registered trade account, and that records of such customers be maintained and made available to the local planning authority on request. No condition is sought or offered restricting entry to the premises.

5. A requirement that the butcher, bakery and food-production elements shall not operate as separate or independent businesses and shall remain subordinate to the principal use.
6. Restriction of opening and servicing hours, and control of deliveries and use of the rear loading area.
7. Approval of extraction, ventilation and odour control details for the butcher and bakery areas prior to first use.

Conditions of this kind are capable of securing the principal and ancillary relationship for the life of the permission, and the applicant offers them for that purpose.

## 11. Conclusion

The Council has confirmed that it would be supportive in principle of a wholesale cash and carry use at this location, provided any retail sales element remains clearly ancillary and subordinate. The proposal is framed on precisely that basis. The principal use is wholesale cash and carry, occupying approximately 76 per cent of trading floorspace, with the ancillary retail sales zone at approximately 14 per cent; the retail, butcher and bakery elements are subordinate, confined to defined areas and capable of being controlled by condition; and the applicant has given a signed operating commitment to that structure.

The proposal maintains the wholesale and distributive function that Policies EC4 and CC10 seek to protect, is consistent with the long-established warehouse character of the premises and the Strangeways area, and is supported by an operating structure the Council has indicated it would accept.

## Annex A – Appeal and decision material relied upon

*Appeal decisions are fact-specific and are not binding. They are set out below to illustrate the approach taken to the characterisation of wholesale and trade-counter uses, and to the use of conditions maintaining a principal and ancillary balance.*

### A1. Ancillary trade counter within a storage and distribution use

**Unit 1, Windmill Trading Estate, Thistle Road, Luton LU1 3XJ. Appeal ref APP/B0230/W/20/3251436. Inspector Tom Gilbert-Wooldridge BA (Hons) MTP MRTPI IHBC. Decision dated 2 October 2020. Appeal dismissed.**

The appeal concerned a proposed retail bakery on a trading estate and was dismissed. At paragraph 8 the Inspector recorded that the majority of units were considered to be Class B8 with trade counter, including the appeal building, and that although tradespeople and the general public could purchase items from those units, the trade counter section was generally small and ancillary to the units' primary storage and distribution purpose. At paragraphs 20 and 21 the Inspector found that, while tradespeople and the general public visited the estate to purchase items, there was not a general retail character, and that the proposed retail bakery would represent a shift towards a more general retail character at odds with the prevailing character of the estate.

**Proposition relied upon: a limited degree of public purchasing can coexist with a use that remains principally storage and distribution in character, provided the sales element is small and ancillary. The decision does not establish any particular acceptable percentage of retail floorspace, and the outcome there turned on the proposal shifting the character of the estate towards general retail.**

### A2. Manchester: protection of the wholesale function in Strangeways

**46 Bury New Road, Manchester. Appeal ref APP/B4215/W/17/3174366. Decision dated 9 October 2017. Appeal dismissed.**

The appeal concerned a hot-food takeaway. At paragraphs 4 to 10 the Inspector addressed saved Policy CC10 and found that the ground floor would cease to be available for the wholesale uses the development plan sought to maintain, describing the surrounding commercial character as including showrooms of wholesale businesses and the associated pattern of deliveries and customers. Health and wellbeing considerations formed a further reason for dismissal.

**Proposition relied upon: Manchester's resistance to the displacement of wholesale activity in Strangeways has been supported on appeal, and an operation that establishes and delivers the protected wholesale function addresses the policy concern that decision identified. The decision does not itself establish that this proposal will deliver that function; that turns on the operation and the conditions offered.**

### A3. Manchester: assessment turns on effect, not label

**33–41 Cheetham Hill Road, Manchester. Appeal ref APP/B4215/W/17/3186654. Decision dated 17 May 2018. Appeal allowed.**

A hotel appeal was allowed, the Inspector concluding at paragraphs 17 to 20 that the proposal would not adversely affect the wholesale trade function of the area. The circumstances differ from the present case: the existing lawful use was a car wash, neither the existing nor the proposed use was wholesale, alternative wholesale premises were plentiful, and the Inspector expressly distinguished the 46 Bury New Road decision.

**Proposition relied upon: the assessment under Policy CC10 includes the actual effect of a proposal on the protected economic function, rather than the use-class label alone. The decision is secondary context and does not establish the acceptability of ancillary retail within a warehouse.**

## Annex B – Historic and site evidence

*The figures below are relied upon in section 3 of this statement.*

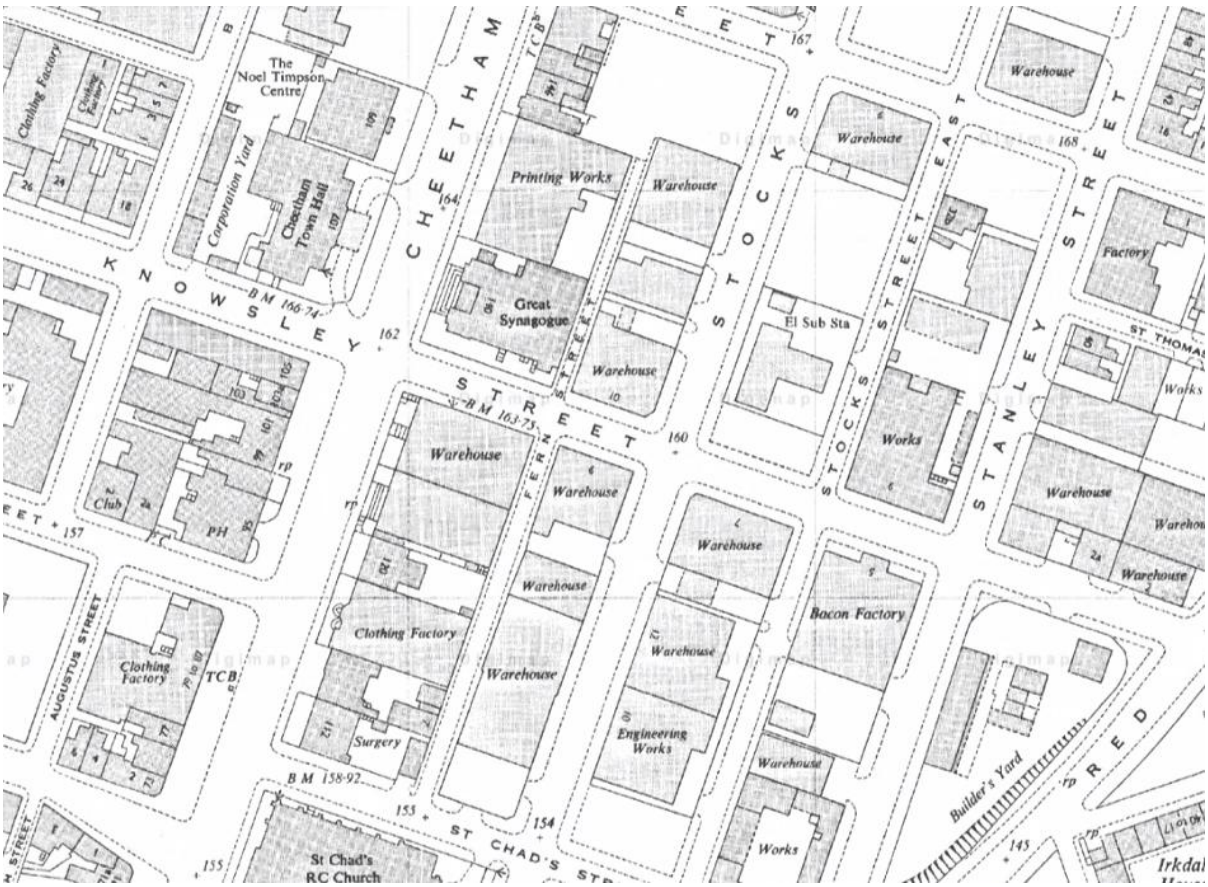



*Figure 1 – Ordnance Survey historic mapping, 1960s. The block bounded by Knowsley Street, Fern Street and Stocks Street is recorded almost entirely as warehouses, with a clothing factory, printing works, engineering works and bacon factory in the immediate surrounding area. Reproduced under Ordnance Survey historic mapping licence.*




*Figure 2 – Street-level imagery, June 2009. The premises in occupation by Influence, with fascia signage reading "INFLUENCE SHOWROOM" to the Knowsley Street frontage. No window display or retail-style advertising is evident other than the showroom signage itself.*




*Figure 3 – Street-level imagery. Rear of the premises, showing signage marked "DELIVERIES" and "LOADING BAY KEEP CLEAR" at the gated rear access, evidencing an established goods-movement and servicing function.*

## Key sources

- Manchester City Council correspondence with the applicant and agent, July to September 2026, including the Senior Planner's email of 10 September 2026.
- Client Declaration and Operating Commitment, Naser Zakrya, Eagle Revive Ltd, 11 September 2026.
- Manchester Core Strategy 2012–2027, Policy EC4 (as read with the 2024 Addendum).
- Manchester Unitary Development Plan, saved Policy CC10.
- Manchester Employment Land Review 2025, section 9 (Strangeways Economic Improvement Area).

- Town and Country Planning (Use Classes) Order 1987, article 3(6)(k), as amended.
- Town and Country Planning Act 1990, section 224 (advertisement offences).
- Planning Inspectorate decisions as set out at Annex A.
- Ordnance Survey historic mapping and street-level imagery, as reproduced at Annex B.
- Location plan 20260807_CS_D_00_A_100102 rev 2; existing site plan 20260807_CS_D_00_A_100104 rev 2; existing floor plan and elevations 20260807_CS_D_00_A_100101 rev 2; proposed floor plan, canopy and signage 20260807_CS_D_00_A_200102.