

## 1. Full Statement of Case:

Appeal Reference: APP/B4215/Y/24/3344892

Site Address: 10 Princess Street, Manchester, M15 4HA

Appellant: Moda Invest Ltd (represented by Mr. Victor Xie)

Local Planning Authority: Manchester City Council

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### 1. Introduction

This statement is submitted on behalf of Moda Invest Ltd in support of the appeal against the refusal of planning permission by Manchester City Council for the development at 10 Princess Street, Manchester, M15 4HA.

### 2. Background

The planning application was originally submitted by Moda Invest Ltd on 14 April 2022 and was refused by the Manchester City Council on 9 May 2024. The application sought Listed Building Consent for external wall repairs, window replacement, roofing, and drainage improvements at Barracks House, 10 Princess Street, Manchester.

### 3. Grounds of Appeal

The grounds for this appeal are based on addressing the reasons for refusal as detailed in the decision notice from the Manchester City Council.

Reason for Refusal: The proposed alterations and repairs to the external walls, windows, guttering system, and roofing would not preserve or enhance the Grade II designated heritage asset, causing less than substantial harm that cannot and has not been outweighed by public benefit.

Appellant's Response:

Heritage Preservation and Enhancement:

- Risk of Further Deterioration: The building is already experiencing significant wear and tear, and failure to conduct necessary repairs will accelerate its deterioration. This not only threatens the structural integrity of the building but also its historical and architectural value.
- Safety Concerns: The existing damage to the external walls, windows, guttering system, and roofing poses safety risks to the residents and the general public. Addressing these issues is imperative to ensure a safe living environment and prevent potential accidents.
- Commitment to Preservation: We are committed to preserving the historical significance of the building through careful and sensitive repairs. We are willing to accept guidance and advice from the relevant authorities on the correct usage of materials and techniques.

Public Benefit:

- Enhanced Community Value: By restoring and maintaining the building, we are ensuring that it remains a valuable and functional part of the community. The improvements will enhance the building's appearance and contribute positively to the local heritage and environment.
- Compliance with Policy: The proposed works align with the objectives of the National Planning Policy Framework, particularly Section 16 on conserving and enhancing the historic environment, as well as the Core Strategy for the City of Manchester policy EN3 (Heritage) and saved policy DC19.1 (Listed Buildings).

### 4. Supporting Information

The following documents are referenced in this statement and accompany the appeal:

- Detailed Repair Plan: same as our initial submission.
- Structural Report: If necessary, we will not hesitate to spend money to hire an expert to do this report again.
- Community Impact Statement: Evidence of the public benefits that the proposed works will bring, including letters of support from local residents and community groups . (If you have a government specialist in this section who can help us make the contact, it will greatly improve our work efficiency.)

#### 5. Conclusion

In conclusion, the appellant respectfully requests that the Planning Inspectorate reviews the detailed responses provided in this statement and overturns the decision of Manchester City Council to refuse planning permission for the proposed development at 10 Princess Street, Manchester. It is clear that the proposed works are necessary for the preservation and safety of the heritage asset and that the public benefits outweigh any perceived harm. We are also willing to work closely with the relevant authorities to ensure that all repair methods and materials used are appropriate and in line with heritage conservation standards.

#### 2. Additional Supporting Documents: Including any further plans, drawings, and documentation specific to the appeal.

In our initial submission, we included detailed plans and specifications for the repair and restoration of the building. If there are specific standards or guidelines that the LPA requires us to follow, we kindly request that these be provided. This will allow us to adjust our plans accordingly and ensure full compliance with the required standards. We aim to submit the correct documents promptly and appreciate your assistance and understanding. If there are any additional documents required or further actions needed, please let us know immediately.

Thank you for your cooperation.

Yours sincerely,

Victor Xie

On behalf of Moda Invest Ltd