Heritage Statement

Blackley Offices and Yard, Victoria Avenue, Blackley, Manchester

September 2025

Turley
Heritage

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Client
Manchester City Council

Our reference
01715

September 2025

1. Introduction

1.1 This revised Heritage Statement has been prepared by Turley Heritage on behalf of Manchester City Council ('the Applicant') in support of a full planning application and listed building consent (LBC) for the erection of a car port, with solar PV panels on its roof, the removal on an existing metal barrier and the installation of timber gates and fence panels to the entrance of the courtyard ('the Proposed Development') at Blackley Offices and Yard, Victoria Avenue, Blackley, Manchester ('the Site'), which are considered to be curtilage listed in association with the grade II listed Blackley Crematorium.

1.2 An application for planning permission and LBC was submitted in December 2024. At this time, the proposals involved solar PV panels located on the roof with structural support. Since the submission of the application, the proposals have changed and this Heritage Statement has been prepared to address this revised scope of works.

1.3 The Proposed Development forms part of a wider Manchester City Council decarbonisation project. Manchester City Council (MCC) has targeted Net Zero Carbon status by 2038. Surveys have been undertaken of MCC's building stock and a number of potential decarbonisation measures were reviewed. This prioritised ways to reduce energy demand and improve efficiency, followed by installing low or zero carbon solutions including renewable energy. Ways to offset any remaining emissions were then reviewed. Various mechanical and electrical upgrades have been proposed for MCC buildings, including Blackley Offices and Yard, which include the installation of solar PV panels.

1.4 In determining the submitted applications for planning permission and LBC, Manchester City Council (MCC) has statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 to 'have special regard' to the desirability of preserving the special architectural or historic interest of the building or its setting.[1] The meaning of 'preservation' in this context, as informed by case law, is taken to be the avoidance of harm. Case law has determined that these are matters to be given 'considerable importance and weight' in the planning process.

1.5 The NPPF provides the Government's national planning policy on the conservation of the historic environment. In respect of information requirements for applications, Paragraph 207 states the following:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".[2]

1.6 To comply with these requirements, Section 2 of the statement identifies the heritage assets that will be affected by the Proposed Development. Section 3 provides an

1 Sections 16 (1) and 66(1)

2 MHCLG (2024) National Planning Policy Framework (NPPF), Paragraph 207

assessment of their significance, in terms of the special architectural and historic interest, of the grade II listed Blackley Crematorium and curtilage listed Blackley Offices and Yard. This assessment of significance is proportionate to both the importance of the identified heritage asset and the likely impacts of the application proposals. It is undertaken on the basis of published information, archival research and on-site visual survey.

1.7 Section 4 provides an assessment of the impact of the Proposed Development, in light of the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990, national policy set out in the NPPF, and local planning policy for the historic environment (set out in detail at **Appendix 1**). The Statement concludes with a summary and conclusions at Section 5.

1.8 This Heritage Statement has been undertaken on the basis of published information, proportionate archival research and a site visit undertaken during September 2024. It has been prepared in accordance with Historic England Advice Notes on 'Statements of Heritage Significance: Analysing Significance in Heritage Assets' (HEAN 12)[3], 'Adapting Historic Buildings for Energy and Carbon Efficiency' (HEAN 18)[4], 'Listed Buildings and Curtilage' (HEAN 10)[5] Good Practice Advice on 'Managing Significance in Decision Taking in the Historic Environment' (GPA 2)[6] and 'The Setting of Heritage Assets' (GPA 3)[7].

3 Historic England (2019) Historic England Advice Note 12, Statements of Heritage Significance: Analysing Significance in Heritage Assets

4 Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency

5 Historic England (2018) Historic England Advice Note 10, Listed Buildings and Curtilage

6 Historic England (2015) Historic Environment Good Practice in Planning Note 2, Managing Significance in Decision Taking in the Historic Environment

7 Historic England (2017) Historic Environment Good Practice in Planning Note 3, The Setting of Heritage Assets (2nd edition)

2. Heritage Assets

2.1 The NPPF defines a heritage asset as:

> *"A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest."*[8]

Designated Heritage Assets

2.2 Designated heritage assets are those which possess a level of heritage interest that justifies designation under the relevant legislation and are then subject to particular procedures in planning decisions that involve them.

Listed Buildings

2.3 Blackley Crematorium was included on the statutory list of buildings of special architectural or historic interest at Grade II Listed on 28th March 2014. A summary description of the building is provided in the Historic England list entry description and states the following:

> *"Crematorium, 1959, by Leonard C Howitt, City Architect. Brown brick and concrete, aluminium windows, single-storey. The furnaces, machinery and service equipment located in the rear service areas are not of special architectural or historic interest."*[9]

2.4 This summary description relates to the principal listed building (identified at **Figure 2.1**).

Curtilage Listed

2.5 Under s1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990, a 'listed building' for the purposes of the Act means a building included on the list, and:

> *(a) Any object or structure fixed to the building;*
>
> *(b) Any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948, shall, subject to subsection (5A)(a), be treated as part of the building.*[10]

2.6 The curtilage of a building (the principal building) is not defined by the 1990 Act but is defined by Historic England as:

> *"…in general terms any area of land and other buildings that is around and associated with that principal building."*[11]

8 MHCLG, National Planning Policy Framework (NPPF) 2024 – Annex 2: Glossary

9 Historic England (2014) Blackley Crematorium Official List Entry

10 Under subsection (5A)(a) an entry for a listed building may provide that an object or structure is not to be treated as part of the listed building or that any part or feature of the building is not of special architectural or historic interest.

11 Historic England (2018) Historic England Advice Note 10, Listed Buildings and Curtilage. pg. 1.

2.7 Curtilage listing is determined by the local planning authority but is ultimately a matter for the courts. Case law[12] has established the following three main criteria to be taken into account. These are reiterated in advice notes on curtilage listing published by Historic England[13] and the Institute for Historic Building Conservation (IHBC)[14] and are also set out in Charles Mynor's 'Listed Buildings and Other Heritage Assets'[15]:

(i) The physical 'layout' of the listed building and the structure;

(ii) their ownership, past and present; and

(iii) their use or function, past and present.



Figure 2.1: Plan showing the location of the Grade II Listed Blackley Crematorium (the principal listed building) in relation to the Offices and Yard (outlined red)

2.8 The three criteria set out at Paragraph 2.6 above have therefore been applied below in relation to Blackley Offices and Yard:

- **The physical 'layout' of the listed building and the structure** – Blackley Offices is at the north east of a tree-lined avenue and Blackley Crematorium is to the south west, where they retain a close visual relationship. They are both

12 The tests were first proposed in the Attorney-General ex rel. Sutcliffe and Others v. Calderdale BC, 1982, as accepted by Debenhams plc v. Westminster CC, 1987)

13 Historic England (2018) Listed Buildings and Curtilage Historic England Advice Note 10. pg. 1.

14 IHBC (2019) Advice Note on the Curtilage Rule – an interpretation of the Taunton Deane judgement

15 Mynors, C and Hewitson, N. (2023) Listed Buildings and other Heritage Assets

experienced within the wider designed landscape setting of Blackley Cemetery. The building, therefore, has a close physical relationship with

- **Their ownership, past and present** – Blackley Offices and Blackley Crematorium have historically been (and continue to be) under the ownership of MCC.

- **Their use or function, past and present** – Blackley Offices was designed and built at the same time as Blackley Crematorium in 1959 to the designs of Leonard C Howitt as part of Blackley Cemetery. The Offices and Yard have historically served Blackley Crematorium and acted as a functional aspect of the Crematorium. The Chapel of Remembrance within the building has also historically been used as an additional chapel.

2.9 Having considered the above, it is concluded that Blackley Offices and Yard have a close physical relationship with Blackley Crematorium. Historically and at present, they have been under the ownership of MCC, and they share an historical and continued use.

2.10 There is a high likelihood that MCC could consider Blackley Offices and Yard to form part of the listed building under s1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990 and that s7 of the same act would apply:

"no person shall execute or cause to be executed any works for the demolition of a listed building or for its alteration or extension in any manner which would affect its character as a building of special architectural or historic interest, unless the works are authorised."[16]

2.11 The Historic England Advice note states:

"A building within the curtilage may have its own special architectural or historic interest or may contribute to the special interest in the principal building as part of the group…

… It is possible, of course, that it holds no special interest and so, even if it is within the curtilage, works to it and even its demolition will require no consent."[17]

2.12 It is therefore important to understand how and to what extent the Offices and Yard contribute to the special architectural or historic interest (significance) of Blackley Crematorium (the principal building).

2.13 Based on the disposition of the Proposed Development, the nature of interposing landscape and topography, when considered together with the individual significance of other heritage assets, it was considered that no other heritage assets (designated or non-designated) would be impacted by the Proposed Development.

16 Section 7

17 Historic England (2018) Listed Buildings and Curtilage Historic England Advice Note 10. pg. 2.

3. Assessments of Significance

3.1 The NPPF defines the significance of a heritage asset as:

"The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset's physical presence, but also from its setting."[18]

3.2 Historic England provide guidance on the assessment of significance of heritage assets.[19] This has been used as guidance for describing heritage significance.

Listed Buildings

3.3 Listed buildings are defined as designated heritage assets that hold special architectural or historic interest that are, for the time being, included in a list compiled or approved by the Secretary of State under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990; for the purposes of that Act. The principles of selection for listed buildings are published by the Department of Culture, Media and Sport ('DCMS')[20] and supported by Historic England's Listing Selection Guides for each building type.

Setting

3.4 The NPPF defines the setting of a heritage asset as:

"The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral."[21]

3.5 Historic England has published guidance[22] in respect of the setting of heritage assets, providing detail on understanding setting and the associated assessment of the impact of any changes. The guidance confirms that:

"Setting is not a heritage asset, nor a heritage designation, rather its importance lies in what it contributes to the significance of the relevant heritage asset itself."

3.6 The guidance sets out a step-by-step process for proportionate assessment of the significance of a heritage asset that may be affected by a proposal.

18 MHCLG (2024) National Planning Policy Framework (NPPF) – Annex 2: Glossary

19 Historic England (2019) Heritage Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets

20 DCMS (2018) Principles of Section for Listed Buildings

21 MHCLG, National Planning Policy Framework (NPPF) 2024 – Annex 2: Glossary

22 Historic England (2017) Good Practice Advice Note 3: The Setting of Heritage Assets (2nd edition)

3.7 Further guidance on the definition of setting and how it should be taken into account is set out in the latest National Planning Practice Guidance ('NPPG') relating to the historic environment. The NPPG sets out that:

"The extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places."[23]

Assessment

3.8 The following assessment of significance is proportionate to both the significance of the identified heritage asset and sufficient so as to understand the impact of the Proposed Development, given their nature and extent. The assessment has been undertaken on the basis of published information, archival research and on-site visual survey.

Blackley Crematorium (Grade II Listed): Principal Listed Building



Figure 3.1: View south west towards the bowed frontage of Blackley Crematorium

Architectural and Historic Interest

3.9 Blackley Crematorium is of architectural and historic interest as a bold example of modernist crematorium architecture, designed in 1959 by Leonard C Howitt,

23 MHCLG (2019) National Planning Practice Guidance. Paragraph: 013 Reference ID: 18a-013-20190723

Manchester City Architect, as part of Blackley Cemetery (completed in 1953). Blackley Crematorium was one of the first crematoria in Britain to adopt a modern and European-influenced design. The building was awarded the Manchester Society of Architects Bronze Medal Award in 1959.

3.10 The crematorium has a symmetrical layout with a large central chapel, flanked by two smaller side chapels. The simple plan form with three separate chapels allows several funerals to take place at the same time. Service areas, furnaces and offices are located to the rear within a small service yard and are separated from the primary funeral service areas, hiding the functional aspects of the building from the public. The overall plan form contributes to the functional interest of the building through use of separate and discreet entrances/exits away from the rear service areas.

3.11 Its architectural interest largely derives from the wide principal (north eastern) curved of the central chapel. The bowed frontage is symmetrical and contains stained glass in an abstract design. It incorporates tall and closely set Portland stone mullions that rise from a sill above a faceted black granite plinth, which connect to two transoms set above. A concrete cross with blue terrazzo cladding is at the centre of the bowed frontage, aligning with the furnace chimney.

3.12 The central chapel is flanked by two lower ranges, each containing an entrance hall, side chapel and exit hall. The entrance halls are built of buff-brick and contain a single window and double doors. The side chapels are set back and rise above the entrance halls but sit lower than the central chapel. Their frontages each contain a full width window, similar to the central chapel, deeply recessed with Portland stone mullions and transoms with stained glass in an abstract design. The exit halls (on the return elevation to the entrance halls) have a similar composition, with tall mullion and transom windows, and the rear walls feature a series of vertical brick fins.



Figure 3.2: Interior of the main chapel showing splayed side walls that converge at the catafalque area

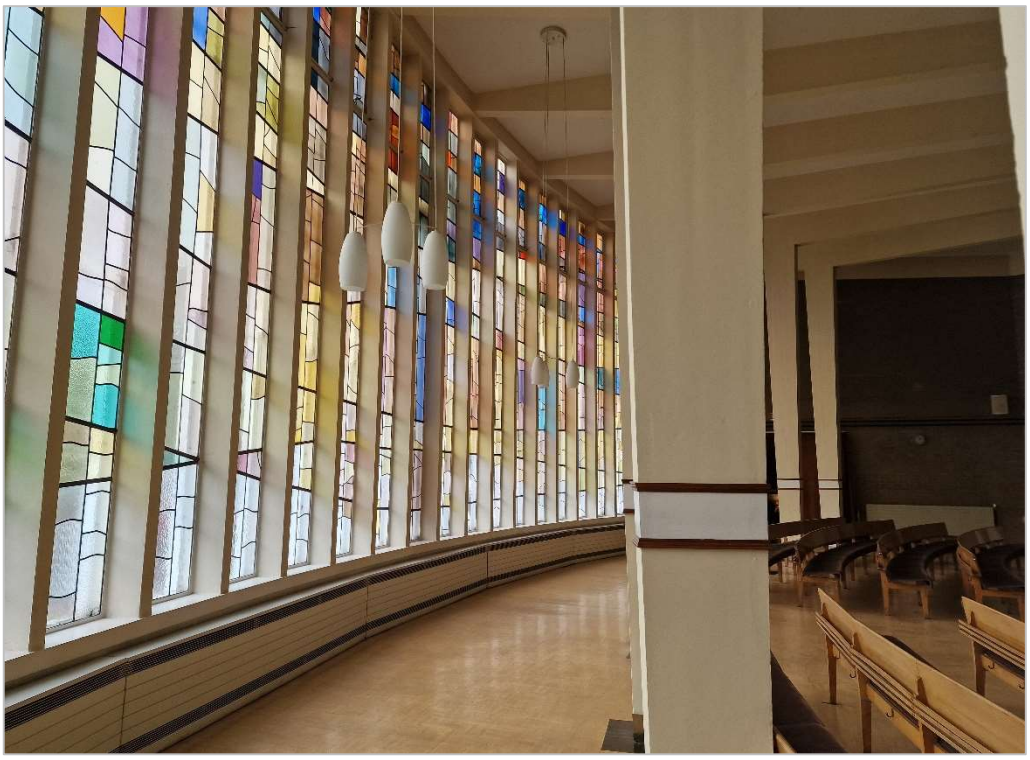


Figure 3.3: Interior of the main chapel of Blackley Crematorium showing stained glass

3.13 The rear of the crematorium has minimal fenestration or architectural detailing. This contains the service area, furnaces and offices, and form the functional aspects of the building. A rectangular chimney associated with the furnaces rises central to the service area. The building has an enclosed rear yard.

3.14 Internally, the building retains many original features reflecting the overall modernist design of the building.

3.15 The main chapel has a reinforced concrete frame and a fan-shaped plan with splayed side walls that join at the catafalque area. A series of concrete piers are arranged around the chapel's bowed frontage to form an aisle between the stained glass and main chapel seating area. The piers rise to the ceiling to meet concrete beams that follow the plan of the main chapel, forming radiating beams that converge at the catafalque area. The catafalque area has catafalque gates made of black metal with abstract stained glass infill. Above the catafalque is a domed skylight. The chapel contains original curved bench seating and an electric organ is located in a small room behind the splayed western side wall.

3.16 The two entrance halls in front of each side chapel are lit by domed skylights with circular lens lights. The rear walls of the entrance halls incorporate blue mosaic panels that flank double entrance doors leading into the side chapels. Identical doors also lead to the main central chapel at the side. Both side chapels have catafalques on slightly raised platforms behind sliding catafalque gates, above which are small domed skylights. Original pendant lights hang from the centre of circular ceiling recesses on each side of the chapel. Above the entrance doors are large mullioned and transomed

windows with stained glass in an abstract design. The walls have since been plastered and painted.

3.17 The committal room is situated behind the main chapel and has access from the side chapels. It has been designed to minimise noise through use of acoustic tiles lining the walls and cork floors. It is lit by a series of small circular skylights.

3.18 The furnace room contains three furnaces and has access to rear staff and service rooms. These rear ancillary rooms, as well as a short corridor leading to the enclosed rear yard, are lit by circular skylights.

3.19 Pursuant to s1 (5A) of the Planning (Listed Buildings and Conservation Areas) Act 1990 it has been declared that the furnaces, machinery and service equipment located in the rear service areas are not of special architectural or historic interest.[24]

Contribution of Setting to Significance

3.20 Blackley Crematorium is located in a slightly elevated, yet enclosed, position in Blackley Cemetery. It is at the south west of a tree-lined avenue and the Chapel of Remembrance (Blackley Offices and Yard) is to the north east. Memorial gardens surround the Crematorium to the north, south west and south. Beyond this, it is enclosed by mature trees.

3.21 Blackley Crematorium is experienced within the wider designed landscape setting of Blackley Cemetery. The visual and functional relationship with Blackley Cemetery provides historic context which contributes to an appreciation of the building's historic and continued use. The principal symmetrical façade specifically relates to, and contrasts with, the meandering roads leading through the cemetery, which heightens accentuates the presence of the building and enables a greater appreciation of the modernist design of the building.

3.22 Blackley Crematorium and Blackley Offices and Yard have group value which contributes to their shared significance. The Crematorium retains a visual relationship with Blackley Offices and Yard at opposing ends of the tree-lined avenue. This enables an understanding of their functional relationship and contributes to the appreciation of their historic and architectural association.

3.23 The southwest view along the tree-lined avenue to the Crematorium's principal façade is a key designed view where the building's architectural interest is primarily appreciated. The avenue of trees accentuates the building's symmetrical frontage. A photograph from 1968 (**Figure 3.4**) indicates that trees were planted early within its history and emphasise this aspect of the building's design.

24 Historic England (2014) Blackley Crematorium Official List Entry



Figure 3.4: 1968 Photograph of Blackley Cemetery and Crematorium, Victoria Avenue, south side (©GM Lives Ref. GB127.m15089

Blackley Offices and Yard: Curtilage Listed

Architectural and Historic Interest: Contribution to the Significance of Blackley Crematorium

3.24 Blackley Offices and Yard were designed and built at the same time as Blackley Crematorium in 1959 to the designs of Leonard C Howitt as part of Blackley Cemetery. Whilst not individually listed, by virtue of its physical layout, shared ownership and historic and present use, Blackley Offices and Yard have potential to be curtilage listed and has been treated as such for the purposes of the submitted applications and this Statement.

3.25 The Offices are arranged around a central courtyard to the south east of the Chapel of Remembrance. The Service Yard adjoins the offices in a U-plan form to the north east and is arranged around a yard. The building is built of brick and windows are a combination of black aluminium casement windows, timber framed windows and uPVC in a regular arrangement around the building.



Figure 3.5: View north towards Blackley Offices and Yard

3.26 The significance of Blackley Crematorium arises from its bold modernist style, designed in 1959 by Leonard C Howitt, as one of the first crematoria in Britain to adopt a modern and European-influenced design. Blackley Offices and Yard make a positive contribution to the significance of the principal building through:

- **Modernist style:**
  - **Roofscape:** Blackley Offices and Yard are composed of rectangular ranges with a flat roof, which contribute to an overall clarity of the design and simplicity of the building.
  - **Chapel of Remembrance**: The Chapel of Remembrance contributes to the architectural interest of Blackley Crematorium principally for its modernist style. It is built of brick with tall concrete fins and has a distinctive hexadecagonal form. It is flanked by the lower Offices to the south east. This composition adds a sense of verticality and hierarchy to the Chapel that contrasts with the Offices.
  - **Original Windows and Doors**: There are a number of original windows and doors that reflect the original interior design scheme and modernist style of the building through their form and composition.
- **Architect**: Blackley Offices and Yard form part of the original layout and designs of Blackley Crematorium by Leonard C Howitt.
- **Hierarchical relationship**: The contrast between the Chapel of Remembrance and the Offices and Yard separates the memorial area from the more functional aspects of the building. They are, however, integrated with shared access.

- **Group value:** Blackley Crematorium and Blackley Offices and Yard have group value which contributes to their shared significance.



Figure 3.6: 1968 photograph of the south west facing elevation of the Blackley Offices and Yard (© GM Lives ref: GB127.m15090)

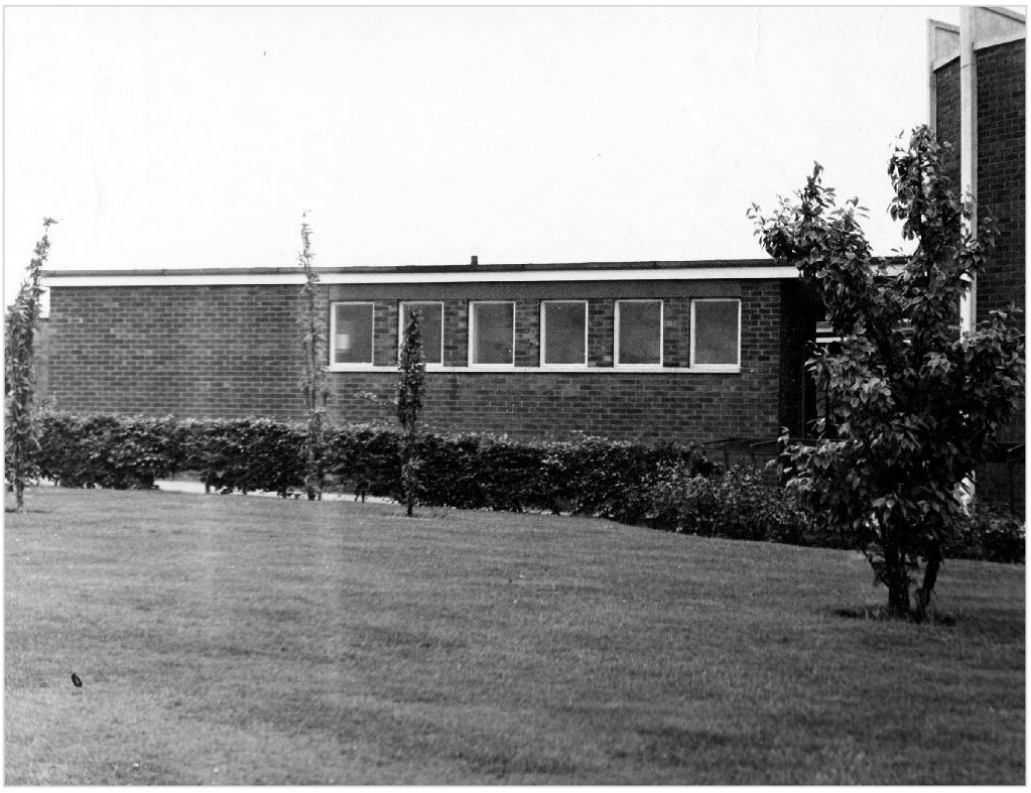


Figure 3.7: 1968 photograph of the north west facing elevation of the Blackley Offices and Yard (© GM Lives ref: GB127.m15092)

4. Impact Assessment

Introduction

4.1 MCC, in determining the submitted application for full planning permission and Listed Building Consent, has statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 to 'have special regard' to the desirability of preserving the special architectural or historic interest of the building or its setting.[25] The meaning of 'preservation' in this context, as informed by case law, is taken to be the avoidance of harm. Case law has determined that these are matters to be given 'considerable importance and weight' in the planning process.

4.2 Paragraph 210 of the NPPF states that, in determining planning applications, local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets, putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.

4.3 Paragraph 212 requires, when considering the impact of development on the significance of a designated heritage asset, that great weight should be given to the asset's conservation. 'Conservation' is defined by the NPPF as 'the process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.'

4.4 Paragraphs 213, 214 and 215 differentiate between 'substantial' and 'less than substantial harm' and provide a framework for the consideration of harm to the significance of designated heritage assets, where it arises, bearing in mind the considerable importance and weight that must be given to the statutory duties of the 1990 Act.

4.5 Paragraph 219 requires that local planning authorities look for opportunities for new development within conservation areas and within the setting of heritage assets to better reveal their significance. It states that proposals that preserve those elements of setting that make a positive contribution to, or better reveal the significance of the asset, should be treated favourably.

Planning Context and Pre-Application Discussions

4.6 The application proposals have been informed by pre-application discussions with MCC planning and conservation officers. An on-site meeting with the MCC planning and conservation officers, representatives from the client team and Turley Heritage was held on 26th September 2024. The purpose of the meeting was to discuss and review the emerging proposals. These discussions have informed the Proposed Development.

25 Sections 16(1) & 66(1)

The Proposed Development

4.7 The Proposed Development is associated with MCC's decarbonisation of their buildings, and in relation to Blackley Offices and Yard, consist of the following:

- Installation of 35 no. Solar PV panels mounted to a steel carport structure within the rear Yard compound; and
- Removal of existing metal barrier and installation of timber gates and fencing to enclose the entrance to the courtyard.

4.8 The Proposed Development is discussed and its impact assessed below.

Installation of Carport Structure and Solar PV

4.9 All proposed solar PV panels would be sited on an independent flat roof steel framed structure to be installed within the rear yard area to the rear of the office building. Its location is detailed on drawing ref: 24606.303 A and shown at **Figure 4.1.**

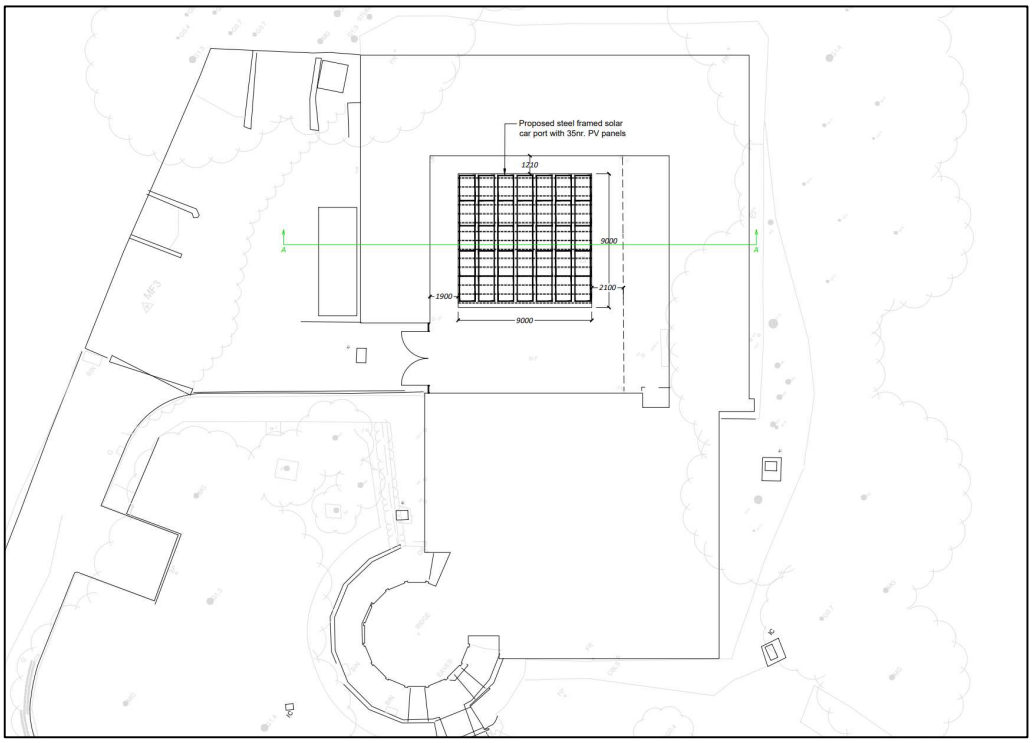


Figure 4.1: Drawing showing location of proposed carport and solar PV array (drawing ref: 24606.303 A)

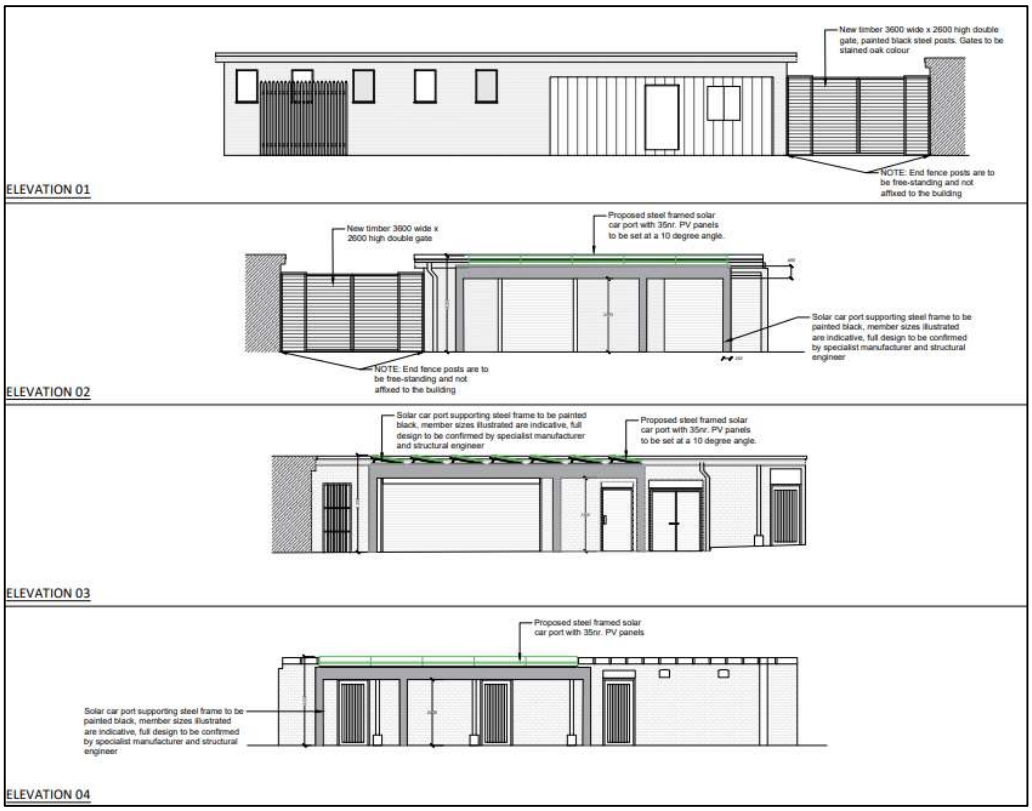


Figure 4.2: Elevational drawing showing location of proposed carport, solar PV array and gates (drawing ref: 24606.301)

4.10 Historic England have recently published Historic England Advice Note 18 'Adapting Historic Buildings for Energy and Carbon Efficiency'[26], which this has been used as a guide for best practice. Historic England's Advice Note 18, paragraph 96 states:

"Installation of photovoltaic and solar thermal panels will be acceptable in some cases.

- *Their installation can often be designed in a way that avoids harm to the special interest of listed buildings. Yet, they have the potential to be visually incongruous and harm a building's architectural qualities. Care is required, especially in considering the aesthetic impact of panels on significant views of the building.*
- *The physical work necessary to install and maintain panels (e.g. fixings, wiring and/or pipework) will generally not preclude their installation, provided care is taken not to harm special interest.*
- *Specialist consideration should be given to the impact on the roof of the additional weight of the panels, weather-tightness and risks of fire.*
- *Certain buildings may require the sensitive installation of safe working systems, for example to enable panels to be maintained."*[27]

26 Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency

27 Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency. pg. 30.

4.11 In accordance with Paragraph 97, *"installation of panels will generally be acceptable if hidden from view. Locations which will normally have very minimal or no impact include valley roofs and behind parapets on flat or low-pitched roofs."*[28]

4.12 Various options have been explored to identify the most suitable location for the solar PV array. Initially, the array was located on the south western roof of the Offices. During pre-application discussions, heritage concerns were raised by MCC regarding the visual impact on the building if the solar PV array was located here. As a result, the proposed location of the solar PV array was amended and approved (application refs. 141804/VO/2024 & 141804/VO/2024). Since the approval of this application, the siting has been amended again and would be located away from this part of the building to an area of lesser significance on an independent structure within the yard of the Offices and Yard building.



Figure 4.3: 3D model showing the location of the carport and solar PV array in views from the access road within the cemetery and in views close to the Offices and Yard building (produced by Drees and Sommer)

4.13 The visibility of the solar PV array and carport has been minimised by locating them on an independent structure in a discreet location. The structure sits broadly at the same height as the Offices and Yard building. The tilt of all panels has been reduced to 10° to minimise their visibility, whilst still retaining performance. Whilst the carport and solar PV array would be visible from within the yard itself, the height of the proposed carport, in combination with existing tree coverage and proposed vehicular gates would mean that the proposed carport and solar PV array would be screened in views from access roads in the cemetery (**Figure 4.3**). It is therefore concluded that the solar PV would not detract from the composition of the principal south west facing elevation

28 Ibid.

of the Chapel of Remembrance and Offices, or the appreciation of Blackley Crematorium, from these points.

Vehicular Gates

4.14 It is proposed to remove the existing metal barrier (**Figure 4.4**). It will be carefully removed and the wall will be made good with matching materials. This is not considered to make any contribution to the significance of the curtilage listed Blackley Offices and so it is concluded that it's removal would not result in any harm.

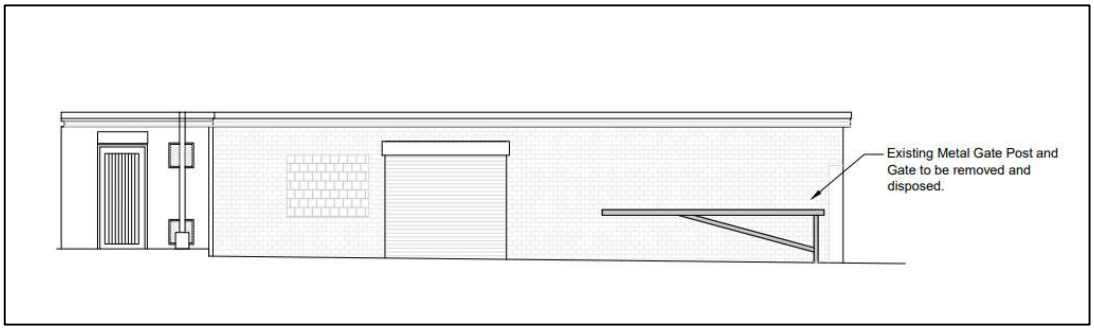


Figure 4.4: Existing Elevation 05 - showing metal gate to be removed

4.15 Solid timber gates with fence panels to a height of 2.6m (**Figure 4.2**) are proposed to be installed to the yard entrance and would replace the existing vehicular barrier. This would conceal the carport and solar PV array. The timber gates and fencing would be constructed independently and would not be fixed to the building.

4.16 Whilst the vehicular gates would be visible in combination with the rear functional aspects of the Office and Yard building, this part of the building makes a minimal contribution to the special interest of the grade II listed Blackley Crematorium. The enclosure ensures that the carport and solar PV array would be screened and the use of timber corresponds with the character of the building, thereby minimising the visual impact of the carport and solar PV array.

Summary

4.17 The proposed car port, solar PV array, and gates and fence panels are confined to the rear functional areas and yard of the Service Yard building. Effects on original fabric in relation to these works have been minimised, by designing the car port, and the gates and fence panels to be structurally independent and not fixed to any part of the existing building. The potential for effects on the special interest of the listed building through changes within its setting have been reduced by the location of the car port within the courtyard and the angle of the PV panels has been positioned to keep the overall height to a minimum. These considerations, in combination with the installation of gates and fence panels to the entrance, will ensure the carport and PV panels are not visible outside of the courtyard. The potential impact of the gates and fence panels has been reduced by using a simple design. On this basis it is considered that these aspects of the Proposed Development would not result in any harm to the special interest of the listed building and its significance would be sustained.

Statutory Duty and National and Local Planning Policy

4.18 The Proposed Development, which contributes to the decarbonisation of Blackley Offices and Yard, has been carefully considered and has also been informed by pre-application discussions with MCC planning and conservation officers.

4.19 The Proposed Development has been designed to reduce and minimise harm to Blackley Offices and Yard and the grade II listed Blackley Crematorium. The proposed solar PV and gates and fence at Blackley Offices and Yard are located in areas of least significance, and alteration of original fabric in relation to these works has been avoided. Any visibility of these aspects of the Proposed Development has been designed to avoid harm to the listed building.

4.20 It is concluded that, for the reasons set out in this Heritage Statement, that there would be no harm to the significance of Blackley Crematorium. The Proposed Development would meet the objectives of Paragraphs 210, 212 and 219 of the NPPF and the requirements of s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 can be satisfied if MCC grants planning permission.

4.21 It is concluded that the Proposed Development is in accordance with Places for Everyone (PfE) Policy JP-P2, the objective of Core Strategy (CS) Policy EN3 and Unitary Development Plan (UDP) Policy DC19 which seek to preserve and enhance the historic environment and the setting of heritage assets.

5. Summary and Conclusions

5.1 This revised Heritage Statement has been prepared by Turley Heritage on behalf of Manchester City Council ('the Applicant') in support of a full planning application and listed building consent (LBC) for the erection of a car port, with solar PV panels on its roof, the removal on an existing metal barrier and the installation of timber gates and fence panels to the entrance of the courtyard ('the Proposed Development') at Blackley Offices and Yard, Victoria Avenue, Blackley, Manchester ('the Site'), which are considered to be curtilage listed in association with the grade II listed Blackley Crematorium.

5.2 An application for planning permission and LBC was submitted in December 2024. At this time, the proposals involved solar PV panels located on the roof with structural support. Since the approval of the application (application refs. 141804/VO/2024 & 141804/VO/2024) the proposals have changed and this Heritage Statement has been prepared to address this revised scope of works.

5.3 The Proposed Development forms part of a wider Manchester City Council decarbonisation project. Manchester City Council (MCC) has targeted Net Zero Carbon status by 2038. Surveys have been undertaken of MCC's building stock and a number of potential decarbonisation measures were reviewed. This prioritised ways to reduce energy demand and improve efficiency, followed by installing low or zero carbon solutions including renewable energy. Ways to offset any remaining emissions were then reviewed. Various mechanical and electrical upgrades have been proposed for MCC buildings, including Blackley Offices and Yard, which include the installation of solar PV panels.

5.4 In determining the submitted applications for planning permission and LBC, Manchester City Council (MCC) has statutory duties under the Planning (Listed Buildings and Conservation Areas) Act 1990 to 'have special regard' to the desirability of preserving the special architectural or historic interest of the building or its setting.[29] The meaning of 'preservation' in this context, as informed by case law, is taken to be the avoidance of harm. Case law has determined that these are matters to be given 'considerable importance and weight' in the planning process.

5.5 The Proposed Development has been designed to avoid and reduce harm to Blackley Offices and Yard and the grade II listed Blackley Crematorium. The proposed car port with solar PV panels and the gates and fence at Blackley Offices and Yard are located in areas of least significance, and alteration of original fabric in relation to these works has been avoided. Any visibility of these aspects of the Proposed Development has been designed to avoid harm to the listed building.

5.6 It is concluded that, for the reasons set out in this Heritage Statement, that there would be no harm to the significance of Blackley Crematorium. The Proposed Development would meet the objectives of Paragraphs 210, 212 and 219 of the NPPF

29 Sections 16 (1) and 66(1)

and the requirements of s 16(1) and s66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 can be satisfied if MCC grants planning permission.

5.7 It is concluded that the Proposed Development is in accordance with Places for Everyone (PfE) Policy JP-P2, the objective of Core Strategy (CS) Policy EN3 and Unitary Development Plan (UDP) Policy DC19 which seek to preserve and enhance the historic environment and the setting of heritage assets.

Appendix 1: Legislation, National and Local Planning Policy

The Planning (Listed Buildings and Conservation Areas) Act 1990
Under s1(5) of the Planning (Listed Buildings and Conservation Areas) Act 1990, a 'listed building' for the purposes of the Act means a building included on the list, and:

"(a) Any object or structure fixed to the building;

(b) Any object or structure within the curtilage of the building which, although not fixed to the building, forms part of the land and has done so since before 1st July 1948, shall, subject to subsection (5A)(a), be treated as part of the building."

In determining applications for planning permission affecting the setting of statutory listed buildings, the following duty is placed on the decision maker:

"s.66 (1) In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses."

Case law has confirmed that Parliament's intention in enacting section 66(1) was that decision makers should give "*considerable importance and weight*" to the desirability of preserving the special interest and setting of listed buildings, where "*preserve*" means to "*to do no harm*". The presumption is therefore that development proposals should not give rise to harm to the special interest of a listed building. This duty must be borne in mind strongly when considering cases where harm may be considered to accrue, and then the balancing of such harm against public benefits as required by national planning policy.

National Planning Policy

National Planning Policy Framework (NPPF) (2024)
The National Planning Policy Framework provides a statement of Government planning policies with regard to the protection of all heritage assets. One of the core planning principles of the NPPF is that planning should:

"conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations."

Chapter 16 outlines the Government's guidance regarding conserving and enhancing the historic environment.

Paragraph 207 outlines the information required to support planning applications affecting heritage assets, stating that applicants should provide a description of the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the asset's importance and no more than is sufficient to understand the potential impact of the proposal on their significance.

Paragraph 210 states that with regard to determining planning applications planning authorities should take account of the desirability of sustaining and enhancing the significance of the heritage assets, and putting them into viable uses consistent with their conservation, as well as the desirability of new development making a positive contribution to local character and distinctiveness.

Paragraph 212 confirms that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. It is also confirmed that significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. Any harm to, or loss, of significance of a designated heritage asset should require clear and convincing justification.

Paragraph 213 confirms that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.

Paragraph 214 states that where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

(a) the nature of the heritage asset prevents all reasonable uses of the site; and

(b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and

(c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and

(d) the harm or loss is outweighed by the benefit of bringing the site back into use.

Paragraph 215 states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

Paragraph 219 states that local planning authorities should look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of a heritage asset should be treated favourably.

Local Planning Policy

The Manchester Local Plan, previously known as the Local Development Framework, is formed of Places for Everyone (PfE) Joint Development Plan, Core Strategy (along with the Addendum to Manchester Core Strategy 2024) 2012-2027 and Proposals Map, the extant Unitary Development Plan (UDP) Policies and Greater Manchester Joint Waste and Minerals Development Plan Documents (DPDs).

Places for Everyone Joint Development Plan (adopted March 2024)
Policy JP-P2 relates to Heritage and replaces paragraph 2 of Policy EN3 Heritage of the Manchester Core Strategy. It states that:

"We will proactively manage and work with partners to positively conserve, sustain and enhance our historic environment and heritage assets and their settings. Opportunities will be pursued to aid the promotion, enjoyment, understanding and interpretation of heritage assets, as a means of maximising wider public benefits and reinforcing Greater Manchester's distinct character, identity and sense of place.

…

Particular consideration will be given to ensure that the significance of key elements of the historic environment which contribute to Greater Manchester's distinctive identity and sense of place are protected from harm. These include historic town centres, places of worship, historic transport routes including the canal network, industrial buildings and structures including textile mills, farmsteads and other sites, buildings, and areas of identified archaeological, architectural, artistic and/or historic value.

…

Development proposals affecting designated and non-designated heritage assets and/or their settings will be considered having regard to national planning policy.

…

Proposals should be informed, as necessary, by the findings and recommendations of the appropriate heritage assessment(s) in the development plan evidence base and/or any updated heritage assessment submitted as part of the planning application process."

Manchester's Local Development Framework: Core Strategy Development Plan Document (adopted July 2012)
Policy EN3 Heritage states:

Throughout the City, the Council will encourage development that complements and takes advantage of the distinct historic and heritage features of its districts and neighbourhoods, including those of the City Centre.

Manchester Unitary Development Plan (saved policies)
Policy DC19.1 (Listed Buildings) states that, when determining applications for listed building consent, the Council will have regard to the desirability of securing the retention, restoration, maintenance and continued use of listed buildings and to protecting their general setting.

In giving effect to this policy, the Council will, inter alia, not permit any external or internal alteration or addition to a listed building where there would be an adverse effects on its architectural or historic character.

Guidance

National Planning Practice Guidance (PPG) (2023)
Whilst not planning policy, Planning Practice Guidance provides a clear indication of the Government's approach to the application of national policy contained in the NPPF. Where there is conflict between the guidance in the PPG and earlier documents the PPG will take precedence.

This PPG advises on enhancing and conserving the historic environment. It clarifies that significance of the heritage assets is important as it enable authorities to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals (Paragraph 007).

Paragraph 013 describes the extent and importance of setting is often expressed by reference to the visual relationship between the asset and the proposed development and associated visual/physical considerations. When assessing any application which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change. They may also need to consider the fact that developments which materially detract from the asset's significance may also damage its economic viability now, or in the future, thereby threatening its ongoing conservation.

Principles of Selection for Listed Buildings, Department for Culture, Media and Sport (2019)
This guidance sets out the general principles applied by the Secretary of State when deciding whether a building is of special architectural or historic interest and should be added to the statutory list. It provides a useful framework for assessing and understanding the significance of listed buildings.

Historic England Good Practice Advice in Planning Note 2: Managing Significance in Decision Taking in the Historic Environment (2015)
GPA Note 2 provides information to assist in implementing historic environment policy in the Framework and the related guidance given in the NPPG. These include; assessing the significance of heritage assets, using appropriate expertise, historic environment records, recording and furthering understanding, neglect and unauthorised works, marketing and design and distinctiveness.

Historic England Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)
Historic England has published revised guidance relating to the setting and views of heritage assets. The document gives general advice on understanding setting and how it may contribute to the significance of heritage assets. It also provides advice on how views play a part in setting. It suggests a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets.

The guidance clarifies that there can be a distinction between views that are valued for reasons other than their contribution to heritage significance such as reasons of landscape character or visual amenity.

It states that the extent and importance of setting is often expressed by reference to visual considerations. Although views of or from an asset will play an important part, the way in which we experience an asset in its setting is also influenced by other environmental factors such as noise, dust and vibration from other land uses in the vicinity, and by our understanding of the historic relationship between places. It also clarifies that the contribution that setting makes to the significance of the heritage asset does not depend on there being public rights or an ability to access or experience that setting.

Paragraph 9 of the guidance states that setting is not itself a heritage asset. Its importance lies in what it contributes to the significance of the heritage asset or to the ability to appreciate that significance.

The guidance highlights a series of other considerations that can be relevant to the assessing the impact of development such as 'change over time,' 'cumulative change,' 'access and setting,' 'buried assets and setting, 'designed settings', 'setting and urban design', and 'setting and economic viability'.

It is identified within the guidance that views which contribute more to understanding the significance of a heritage asset include the following:

- Those where the composition within the view was a fundamental aspect of the design or function of the heritage asset.
- Those where town- or village-scape reveals views with unplanned or unintended beauty.
- Those with historical associations.
- Those with cultural associations.
- Those where relationships between the asset and other heritage assets or natural features or phenomena are particularly relevant.

As set out above, a staged approach to assessment is advocated involving identification of the assets that may be affected, assessing the degree to which setting makes a contribution to the significance of the heritage asset or allows significance to be appreciated, assessing the effects of the proposed development and exploring ways to maximise enhancement and avoid or minimise harm.

In assessing the degree to which these settings and views make a contribution to the significance of the heritage assets or allow significance to be appreciated, the key attributes of the heritage asset should be addressed and then the following considered:

- The physical surroundings of the asset and its relationship with other assets;
- The asset's intangible associations with its surroundings, and patterns of use;

- The contribution made by noise, smells etc to significance; and
- The way views allow the significance of the asset to be appreciated.

The Step 2 Checklist provides a list of potential setting attributes that may help to elucidate its contribution to significance under the headings 'The asset's physical surroundings' and 'Experience of the asset'. The Step 3 Checklist provides a list of potential attributes of a development affecting setting that may help to elucidate its implications for the significance of the heritage asset including the 'Location and siting of development', the 'Form and appearance of development', 'Wider effects of the development' and 'Permanence of the development'.

Historic England Advice Note 10: Listed Buildings and Curtilage (2018)
Historic England have produced an advice note on assessing the extent of the curtilage of a listed building. This document provides hypothetical examples to assist in this assessment. It is based on the current legislative provision in the Planning (Listed Buildings and Conservation Areas) Act 1990 (s.1[5]) and consideration of listed buildings and curtilage in legal cases.

Historic England Advice Note 18: Adapting Historic Buildings for Energy and Carbon Efficiency (2024)
Historic England has produced this Historic England Advice Note (HEAN) to provide clarity - in support of consistent decision making - on approaches to improve the energy efficiency and support carbon reduction of historic buildings, whilst conserving their significance.

Historic England Advice Note 12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (2019)
This document provides guidance on analysing significance in heritage assets. It was released in 2019 by Historic England to support the National Planning Policy Framework's requirement for applicants to describe the 'heritage significance' of their proposals to assist Local Planning Authorities in making decisions on impact.

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