Heritage Statement

Didsbury Library, Wilmslow Road, Manchester

May 2025

Turley
Heritage

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Client
Drees and Sommer

Our reference
02922

May 2025

1. Introduction

1.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Drees and Sommer ('the Applicant') in support of an application for listed building consent (LBC) for alterations, including the provision of new radiators and associated heating infrastructure ('the Proposed Works'), to the Grade II Listed Didsbury Public Library, Wilmslow Road, Manchester ('the Site').

1.2 New Air Source Heat Pumps (ASHPs) were installed at Didsbury Library as part of a wider Manchester City Council (MCC) decarbonisation project. Planning permission was granted on 4th May 2023 for the installation of ASHPS within a 'living wall' compound (MCC Ref. 136152/VO/2023). LBC was also granted (MCC Ref. 136153/LO/2023), with additional works including the replacement of internal lighting with LED lighting; installation of new radiators to first and ground floors; and associated trenching and pipework also approved. These works have been implemented.

1.3 Since the installation of the new ASHPs, they have not been functioning as intended, and have been temporarily replaced with boiler plant. Investigations were conducted and it was determined that new heat emitters/radiators are required. The existing heat emitters and pipework are life expired and are significantly beyond the life expectancy detailed by CIBSE Guide M. It is therefore proposed to install new radiators and associated pipework.

1.4 In determining the submitted application for 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 Works. Section 3 provides an assessment of the significance, in terms of the special architectural and historic interest, of the Grade II Listed Didsbury Library. This assessment of significance is proportionate to

[1] Sections 16(2) and 66(1)
[2] MHCLG (2024) National Planning Policy Framework (NPPF), Paragraph 207

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 Works, 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 April 2025. 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], Good Practice Advice on 'Managing Significance in Decision Taking in the Historic Environment' (GPA 2)[5] and 'The Setting of Heritage Assets' (GPA 3)[6].

[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 (2015) Historic Environment Good Practice in Planning Note 2, Managing Significance in Decision Taking in the Historic Environment
[6] 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."[7]

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 Didsbury Library was included on the statutory list of buildings of special architectural or historic interest at Grade II Listed on 3rd October 1974. A description of the listed building is detailed in the Historic England list entry and states the following:

"Public library. 1915, by Henry Price (City Architect). Red brick with dressings of Portland stone, slate roofs. Triangular plan with 2 wings at an acute angle hinged on an octagonal drum, the angle between the wings filled by a hall. Eclectic style with Gothic features. High single storey, dominated by the drum. This rises to a clerestory and has coupled corner pilasters, 3-light mullioned windows with cusped tracery and hoodmoulds, an emphatic sill-band carried round, a deep stone parapet with an upstand in each side, and an octahedral roof surmounted by a finial with weathervane. The front (to the north-east) is enclosed (inter alia) by a single-storey 3-sided porch in the form of a buttressed arcade of 2-centred arches, with an embattled parapet and pyramidal roof, and the parapet carries round angled side-lobbies on both sides. The wings have mullioned and double-transomed windows rising into gablets above the parapet; and hipped roofs."[8]

[7] MHCLG (2024) National Planning Policy Framework (NPPF) – Annex 2: Glossary
[8] Historic England (1974) Didsbury Public Library Official List Entry



Figure 2.1: Plan showing the location of the Grade II Listed Didsbury Library

2.4 Based on the nature and extent of the Proposed Works no other heritage assets (designated or non-designated) would be impacted by the proposals.

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."[9]

3.2 Historic England provide guidance on the assessment of significance of heritage assets.[10] 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')[11] and supported by Historic England's Listing Selection Guides for each building type.

Assessment

3.4 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 Works, given their nature and extent. The assessment has been undertaken on the basis of published information, archival research and on-site visual survey.

[9] MHCLG (2024) National Planning Policy Framework (NPPF) – Annex 2: Glossary
[10] Historic England (2019) Heritage Advice Note 12 Statements of Heritage Significance: Analysing Significance in Heritage Assets
[11] DCMS (2018) Principles of Section for Listed Buildings

Didsbury Public Library (Grade II Listed)



Figure 3.1: View west towards Didsbury Library from Wilmslow Road

Architectural and Historic Interest

3.5 Didsbury Library is of architectural and historic interest as an early 20th century public library, designed by Henry Price, Manchester Corporation Architect and the first city architect. Price designed several notable municipal buildings in Manchester, including Chorlton and Withington libraries, as well as Manchester's Victoria Baths and Hydraulic Power Station. Didsbury Library was built in 1915 following requests from Alderman Fletcher Moss and the building was funded by Andrew Carnegie. It derives historic interest from its association with the donor and the wider group of Carnegie Libraries. Built in 1915, Didsbury Library is one of the later Carnegie libraries. It also has historic interest as an example of one of Manchester's civic buildings built in the inter-war period and reflects the consolidation of Didsbury in the early 20th century.

3.6 The library is built of red brick with Portland stone dressings. It has a distinctive fan shape plan that accommodates a symmetrical 'open book' layout popular at the time (as seen at the Chorlton and Withington libraries). This plan form was typically associated with a corner siting along a street, although this is not the case at Didsbury Library. A central entrance gives access to the reception area, with the public space fanning out beyond. The plan form is consistent with the late 19th and early 20th century trend that moved away from the division of spaces in a library. A drawing dated to 1914 (**Figure 3.2**) indicates that more thought and attention was expended on a children's area, consistent with early 20th century ideology. This was often done in recognition of the need for younger readers to experience books in their own

environment and having access to age-appropriate books.[12] Offices flank the reception area and are separated from public spaces. The 'open book' plan form also allows natural light into the building. The overall plan contributes to the functional interest of the building through the use of separate spaces for public and staff, as well as the separation between the children's area and general reading area and its configuration allowing natural light within the building.

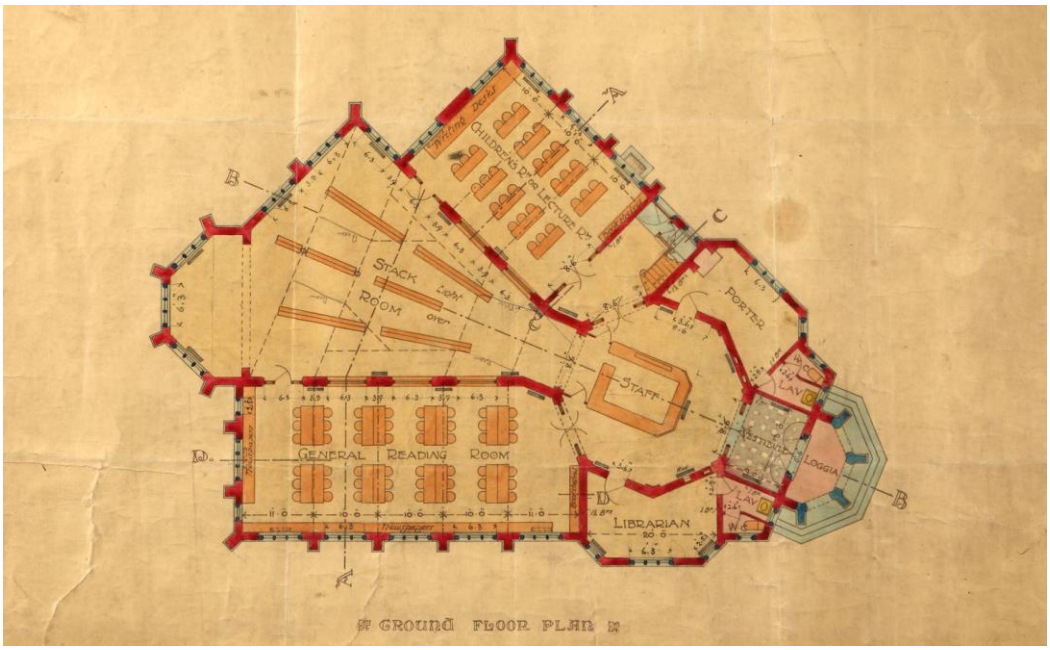


Figure 3.2: Ground floor plan of Didsbury Library, Henry Price dated 1914 (© Manchester Archive+ Ref. 2012-33 Box 35)

3.7 Its architectural interest largely derives from its Gothic Revival style. It has a large octagonal cupola that rises to a clerestory with coupled corner pilasters and three-light mullioned windows with cusped tracery and hoodmoulds. Above is a deep stone parapet and an octahedral roof with a finial and weathervane. The entrance is enclosed by a single-storey porch in the form of a buttressed arcade of pointed arches with a crenelated parapet and pyramidal roof. The wings have mullioned and transomed windows rising to gablets above a parapet. Emblems of Science, Knowledge, Literature, Music and Arts and Crafts are distributed over the building in stone, illustrating its civic use and a sense of civic pride associated with open access libraries. Architectural features such as traceried windows and buttressing are typical of the Gothic Revival style.

3.8 Internally, the building retains some original features reflecting the civic design of the building in the Gothic Revival style. Many features and fixtures, such as original bookcases, have been previously removed as a result of continued function as a public library.

[12] Historic England (2016) The English Public Library 1850-1939. pg 9.



Figure 3.3: Interior of the main stack room of Didsbury Library showing the large rooflight overhead



Figure 3.4: Photograph of the Stack Room, Didsbury Library, dated 1977 (© GM Lives Ref. GB127.m51545)



Figure 3.5: Photograph of the reception area, Didsbury Library, dated 1929 (© GM Lives Ref. GB127.m51531)

3.9 A central entrance gives access to the reception area with a modern desk. This desk replaces the original fixture in the Gothic Revival style, as shown at **Figure 3.5.** The mezzanine above is enclosed by decorative cast iron railings.

3.10 A stack room fans out beyond the reception and is lit by a large domed roof light, featuring moulding around the opening and a central fluted column that rises to the domed roof light. A series of flat-arched openings are arranged along either side of the stack room to give access to the reading room and children's room. The reading room has an exposed king post truss roof with arched brace and corbels, giving the room a distinctly Gothic style. The stack room and reading room contain modern book shelves replacing original fittings in a reconfigured layout, as shown on a photograph dated 1977 (**Figures 4.4**). The walls are tiled to dado height and each room features decorative mouldings including skirting boards, dado rail and cornicing. Internally the electric lighting was designed to allow the public free access to the shelves, browsing and reading areas, which has since been changed to modern units.

3.11 Side offices flank the reception area and are accessed through timber doors with foliate carvings. Staff rooms with a modern kitchen are accessed through a staircase from the reception area. These ancillary rooms are smaller in scale and less ornate than the public areas, indicative of their functional use.

3.12 There are a variety of radiators throughout the library including several painted cast iron radiators. Whilst they are relatively stripped back in design, indicative of the functional use of the library, they are historic in character. There are also several modern replacement radiators.

4. Impact Assessment

Introduction

4.1 MCC, in determining the submitted application for 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.[13] 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 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. An on-site meeting with MCC planning and conservation officers, representatives from the client team and Turley Heritage was held on 3rd April 2025. The purpose of the meeting was to discuss and review the emerging proposals. These discussions have informed the Proposed Works.

[13] Sections 16(2) and 66(1)

The Proposed Works

4.7 The Proposed Works are associated with MCC's decarbonisation of their buildings, and in relation to Didsbury Library, consist of the following:

- Public-facing areas of the library shall receive new, cast-iron radiators which match the existing radiators in appearance;
- Non-public-facing areas (i.e. offices, staff areas etc) shall receive Jaga Strada slimline, discrete radiators; and
- New heating pipework will be installed, following existing routes.

4.8 The Proposed Works are discussed and their impact assessed below.

Replacement and Additional Radiators

4.9 It is noted in Historic England's Advice Note 18, paragraph 94, that:

"Changing boilers, heating and hot water systems to low carbon alternatives, such as heat pumps, will generally be acceptable.

- *Having an effective low carbon heating system is one of the best ways of enhancing an historic building's energy efficiency. In the majority of cases, replacement of existing systems will not cause harm to special interest.*
- *There may be very rare exceptions where the existing heating system, or components of it, has architectural or historic significance (for example, original cast- iron radiators) and remains functional.*
- *The impact of heat pumps can generally be minimised through careful siting, design and screening. Routing pipework may damage historic fabric, with additional archaeological considerations in some sites.*
- *The opportunity should be taken to remove unsightly plant equipment made redundant by the heat pump, for instance oil tanks. This can sometimes offset any harmful impact of installing a pump."*[14]

[14] Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency. pg. 28-29.



Figure 4.1: Cast-iron radiator located in the public-facing area of the library



Figure 4.2: Cast-iron radiator located in the public-facing area of the library

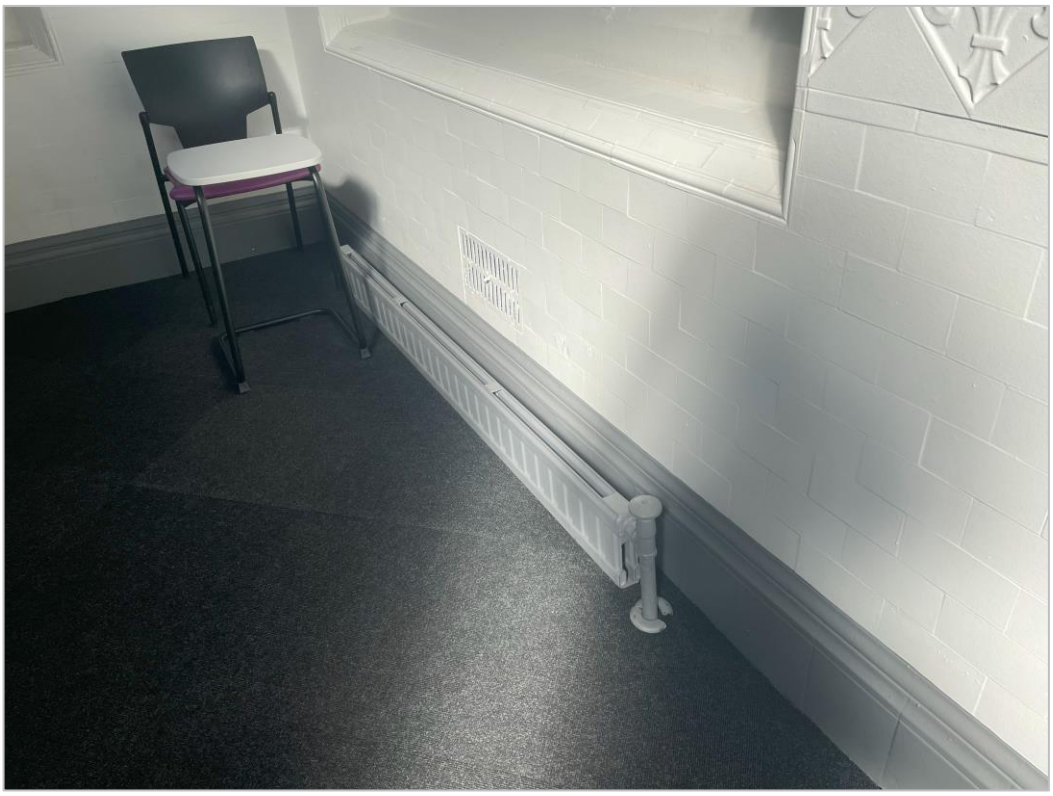


Figure 4.3: Modern radiator located in the public-facing area of the library



Figure 4.4: Modern radiator located in the non-public-facing area of the library



Figure 4.5: Locations of proposed radiators

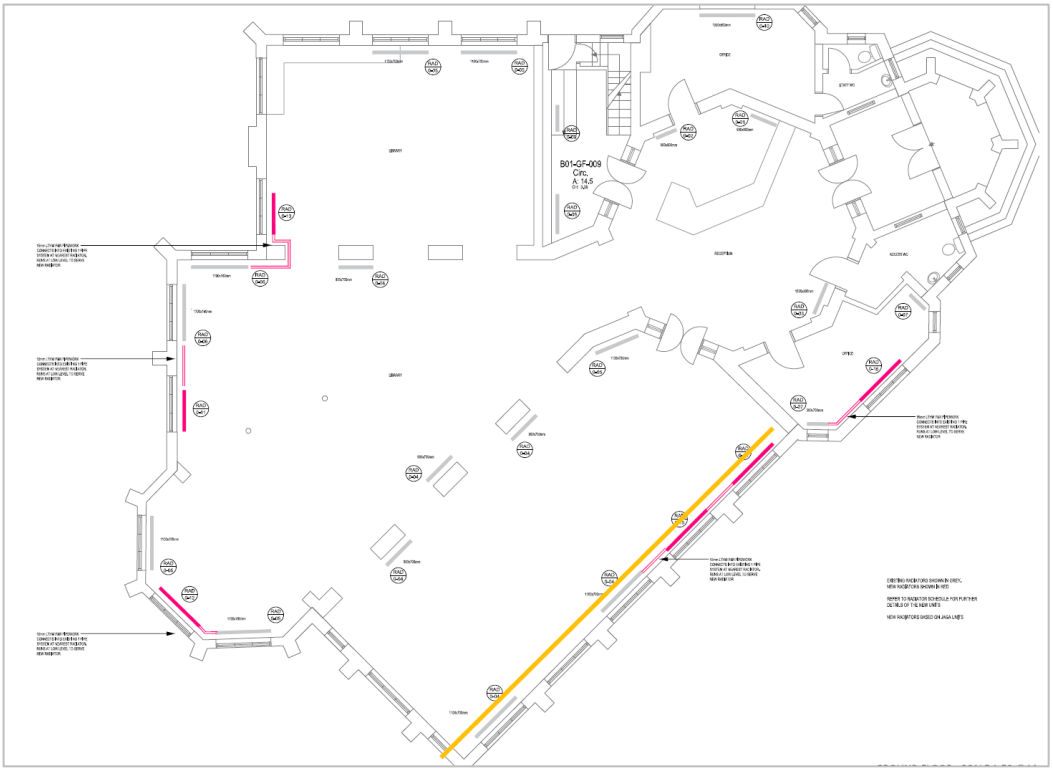


Figure 4.6: Locations of existing radiators to be replaced (grey) and additional radiators and pipework to be installed (pink)

Public-facing Areas

Existing Cast-iron Radiators

4.10 The public-facing areas (including the stack room, reading room, children's room, reception and circulation area) have 16 no. cast-iron radiators. These are varied in condition with indication of decay to valves and do not remain functional with the current ASHP system. Beyond their historic fabric, their overall form and composition make a limited contribution to the architectural and historic interest of the building.

4.11 Existing radiators would be removed and replaced with new cast-iron radiators to correspond with the style and appearance of the existing. The exact specification is to be determined and agreed. The locations of replacement cast-iron radiators are shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6** and these correspond with the existing arrangement/locations.

Existing Modern Radiators

4.12 There are 2 no. existing modern radiators in the public-facing areas that are not original or historic, neither do they contribute to the significance of the building. These are proposed to be replaced with cast-iron radiators. Their replacement with a more sympathetic cast-iron radiator design is an enhancement, and would result in a consistent appearance in the public-facing areas of the building. The locations of replacement cast-iron radiators are shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6** and these correspond with the existing arrangement/locations.

Additional Radiators

4.13 It is proposed that 5 no. new radiators would be installed in the public-facing areas. These are proposed to be new cast-iron radiators. Their design would also result in a consistent appearance in the public-facing areas of the building. Their installation involves the creation of small openings to fix the radiator to the wall. The locations of additional cast-iron radiators are shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6**.

4.14 The quantum of additional radiators is the least amount required to allow the existing ASHPs to function as intended. The location of the additional pipework is shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6.**

Non-public-facing Areas

Existing Cast-iron Radiators

4.15 The non-public-facing areas (including the side offices) have 2 no. Existing cast-iron radiators. These are varied in condition with indication of decay to valves and do not remain functional with the current ASHP system. Beyond their historic fabric, their overall form and composition make a limited contribution to the architectural and historic interest of the building.

4.16 Existing radiators would be removed and replaced with new Jaga Strada Strimline radiators. The exact specification is to be determined. The proposed units are slim and would therefore be visually recessive, and would not detract from or conceal the special interest of the building. The locations of replacement Jaga Strada Strimlime radiators are shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6** and these correspond with the existing arrangement/locations.

Existing Modern Radiators

4.17 There is 1 no. existing modern radiator in the public-facing areas. This is proposed to be replaced with a new Jaga Strada Strimline radiator. The exact specification is to be determined. The existing modern radiator is of low sensitivity and does not contribute to the significance of the building. The proposed unit is slim and would therefore be visually recessive, and would not detract from or conceal the special interest of the building. The location of the replacement Jaga Strada Strimlime radiator is shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6** and these correspond with the existing arrangement/locations.

Additional Radiators

4.18 It is proposed that 1 no. new radiator would be installed in a side office. This is proposed to be a new Jaga Strada Strimline radiator. The exact specification is to be determined. The proposed unit is slim and would therefore be visually recessive, and would not detract from or conceal features that contribute to the special interest of the building. Their installation would result in small openings made to fix the radiator to the wall. The location of the new radiator is shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6.**

4.19 The quantum of additional radiators is the least amount required to allow the existing ASHPs to function as intended. The location of the additional pipework is shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6.**

Associated Heating Pipework

4.20 It is proposed that new heating pipework would follow existing routes to minimise the impact on historic fabric.

4.21 New pipework would also connect to existing pipes at the nearest radiator and run at a low level to serve additional radiators. The location of the proposed additional pipework would be read as a continuation of the functional aspects of the building. The quantum of additional pipework is the least amount required to allow the existing ASHPs to function as intended. The location of the additional pipework is shown on drawing ref. 6776-M-DR-04 and at **Figure 4.6.**

Additional Associated Works

4.22 The temporary boiler plant to the rear of Didsbury Library would be removed. This does not contribute to the special architectural or historic interest of the building.

Impact of the Proposed Radiators

4.23 It is recognised that the removal of historic cast-iron radiators would constitute the removal of original or historic fabric. The impact of these works has been minimised

through the inclusion of new cast-iron radiators in public-facing areas, which would be designed to replicate the style and appearance of the existing radiators. The inclusion of thinner, discreet radiators in non-public-facing areas would not visually detract from or conceal features that contribute to the significance of the building. On site inspection demonstrated that a number of other radiators across the building have already been replaced, including radiators in the mezzanine and first floor staff room. The replacement of non-historic radiators would result in a consistent appearance across the building, in both public and non-public-facing areas.

4.24 It is concluded that, subject to the suitable specification of the replacement radiator units, any overall harm arising from the removal of historic fabric would be 'less than substantial' and of a negligible level.

4.25 The utilisation of existing heating network route minimises the physical impact of the building and it is not considered that these works would be harmful.

4.26 With reference to Historic England's guidance[15], the existing cast-iron radiators do not remain functional with the current ASHP system. These works would also result in the removal of unsightly boiler plant equipment to the rear of Didsbury Library.

Statutory Duty and National and Local Planning Policy

4.27 MCC, in determining the submitted application for LBC, 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.[16] 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.

4.28 The Proposed Works have been carefully considered and have also been informed by pre-application discussions with MCC planning and conservation officers.

4.29 It is recognised that the removal of historic cast-iron radiators would result in a degree of harm to the Grade II listed Didsbury Library. This is considered to be 'less than substantial' and of a negligible level within that category. Accordingly, Paragraph 215 of the NPPF is engaged, which states the following:

"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."[17]

4.30 PPG confirms that public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in Paragraph 8 of the NPPF, bearing in mind and having regard to the considerable importance and weight to be given to the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990. In this case, the Proposed Works are

[15] Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency. pg. 28-29.
[16] Sections 16(2) and 66(1)
[17] MHCLG (2024) National Planning Policy Framework (NPPF), Paragraph 215

necessary to ensure the successful operation of the installed ASHPs and will support the ongoing viable use of this public building.

4.31 This partially conflicts 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. The design of the Proposed Works has however sought to minimise harm to the significance of the listed building and is of a negligible level. The NPPF provides a framework for the consideration of that harm, as set out above. Identified harm should be weighed against the public benefits of the scheme, as a whole.

4.32 UDP Policy DC19 also states that due regard will be given to the desirability of securing the retention, maintenance and continued use of the building, and Paragraph 215 of the NPPF makes reference to public benefits in the context of securing the optimum viable use of an asset. Didsbury Library remains in its original use and although the Proposed Works are not associated with establishing a new use, they are intended to support and contribute to the long term operation and use of the asset.

5. Summary and Conclusions

5.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Drees and Sommer ('the Applicant') in support of an application for listed building consent (LBC) for alterations, including the provision of new radiators and associated heating infrastructure ('the Proposed Works'), to the Grade II Listed Didsbury Public Library, Wilmslow Road, Manchester ('the Site').

5.2 New Air Source Heat Pumps (ASHPs) were installed at Didsbury Library as part of a wider Manchester City Council (MCC) decarbonisation project. Planning permission was granted on 4th May 2023 for the installation of ASHPS within a 'living wall' compound (MCC Ref. 136152/VO/2023). LBC was also granted (MCC Ref. 136153/LO/2023), with additional works including the replacement of internal lighting with LED lighting; installation of new radiators to first and ground floors; and associated trenching and pipework also approved. These works have been implemented.

5.3 Since the installation of the new ASHPs, they have not been functioning as intended, and have been temporarily replaced with boiler plant. Investigations were conducted and it was determined that new heat emitters/radiators are required.

5.4 In determining the submitted application for 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.[18] 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 It is recognised that the removal of historic cast-iron radiators would result in a degree of harm to the Grade II listed Didsbury Library. It is concluded that, subject to the suitable specification of the replacement radiator units, any overall harm arising from the removal of historic fabric would be 'less than substantial' and of a negligible level. Accordingly, Paragraph 215 of the NPPF is engaged.

5.6 PPG confirms that public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in Paragraph 8 of the NPPF, bearing in mind and having regard to the considerable importance and weight to be given to the statutory duties of the Planning (Listed Buildings and Conservation Areas) Act 1990.

5.7 As identified above, the lowest of less than substantial harm has been identified in relation to the significance of Didsbury Library. This partially conflicts with PfE Policy JP-P2, the objective of Core Strategy Policy EN3 and UDP Policy DC19 which seek to preserve and enhance the historic environment and the setting of heritage assets. The design of the Proposed Works has sought to minimise harm to the significance of heritage assets and where harm has been identified, the NPPF provides a framework

[18] Sections 16(2) and 66(1)

for the consideration of that harm, as set out above. Identified harm should be weighed against the public benefits of the scheme as a whole.

5.8 UDP Policy DC19 also states that due regard will be given to the desirability of securing the retention, maintenance and continued use of the building, and Paragraph 215 of the NPPF makes reference to public benefits in the context of securing the optimum viable use of an asset. Didsbury Library remains in its original use and although the Proposed Works are not associated with establishing a new use, they are intended to support and contribute to the long term operation and use of the asset.

Appendix 1: Legislation, National and Local Planning Policy

Legislation

The Planning (Listed Buildings and Conservation Areas) Act 1990
The Planning (Listed Buildings and Conservation Areas) Act 1990 provides that listed building consent is required for:

"(s.7) … 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…"

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

"s.16 (2) In considering whether to grant listed building consent for any works the local planning authority or 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."

"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.

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.

The Labour Government published a consultation on proposed amendments to the NPPF in July 2024. However, there is no relevant suggested changes on Chapter 16. Hence, this appendix does not consider the draft NPPF.

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 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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