

Heritage Statement

Blackley Offices and Yard, Victoria Avenue,
Blackley, Manchester

December 2024

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Client
Manchester City Council

Our reference
01715

December 2024

1. Introduction

- 1.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Manchester City Council ('the Applicant') in support of a full planning application and application for listed building consent (LBC) for alterations, including the installation of Air Source Heat Pumps (ASHPs) and solar PV panels ('the Proposed Works') to the curtilage listed Blackley Offices and Yard, Victoria Avenue, Blackley, Manchester ('the Site'), which is a part of the Grade II Listed Blackley Crematorium.
- 1.2 The Proposed Works form 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 roof mounted solar PV and replacing gas boilers with Air Source Heat Pumps.
- 1.3 In determining the submitted planning application and 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.
- 1.4 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
- 1.5 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 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 Sections 16(2) and 66(1)

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

- 1.6 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.
- 1.7 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 law¹² has established the following three main criteria to be taken into account. These are reiterated in advice notes on curtilage listing published by Historic England¹³ 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 applies:

“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 Works, 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 Works.

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 guidance²² 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.
- 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:

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)

“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 Works, 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, 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.

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

- 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.
- 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.



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

- 3.14 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.



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

- 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

²⁴ Historic England (2014) Blackley Crematorium Official List Entry

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.

Blackley Offices and Yard: Curtilage Listed



Figure 3.5: View north towards Blackley Offices and Yard

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

- 3.24 Blackley Offices and Yard 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. Whilst not individually listed, by virtue of its physical layout, shared ownership and historic and present use, Blackley Offices and Yard has 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.

- 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 makes a positive contribution to the significance of the principal building through:

- **Modernist style:**
 - **Roofscape:** Blackley Offices and Yard is 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)

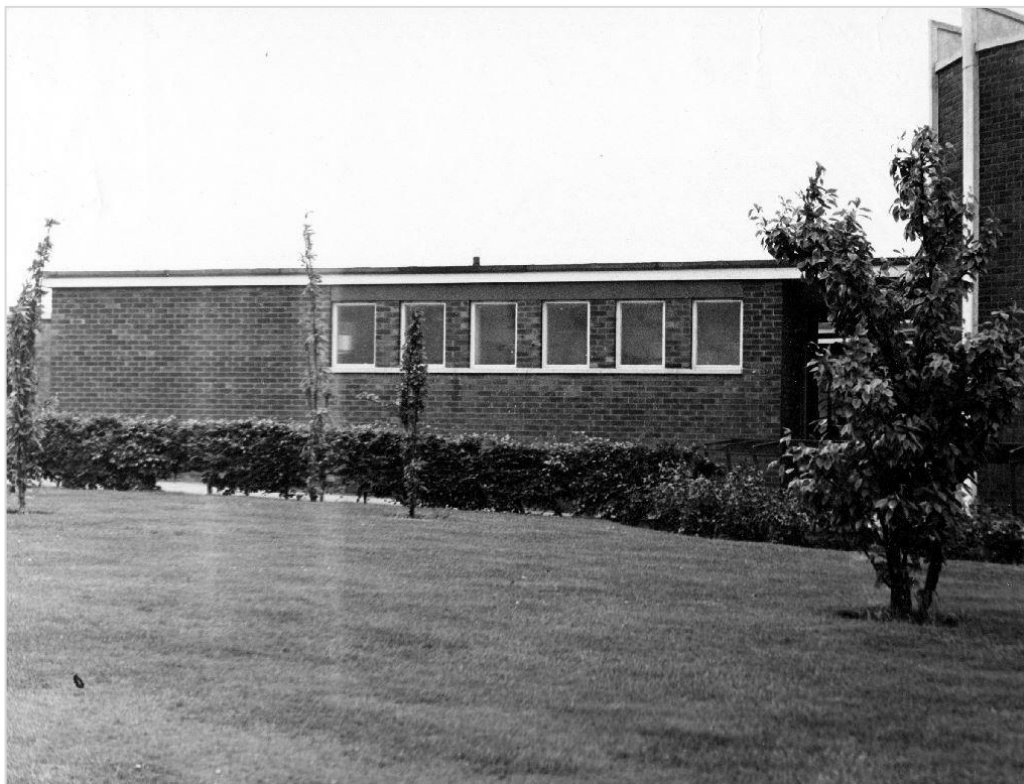


Figure 3.7: 1968 photograph of the north west facing elevation of the Blackley Offices and Yard (© GM Lives ref: GB127.m15092)

4. Impact Assessment

Introduction

- 4.1 MCC, in determining the submitted full planning application and associated 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.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 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 Works.

²⁵ 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 Blackley Offices and Yard, consist of the following:

- Installation of 35 no. roof mounted Solar PV panels to the Service Yard buildings (storage roof area) and associated installation of low level steel framework above the roof;
- Removal of existing gas boilers and installation of high temperature Air Source Heat Pump (ASHP) is proposed to the East facing elevation, with associated pipework connections;
- Formation of ASHP compound enclosure up to 2.5m in height, comprising timber acoustic fencing with gated access, including formation of concrete base support;
- Associated works would be necessary for accessing and maintaining the Solar PV, including a mansafe system with a walkway to storage roof areas, and fixed ladder to the external wall;
- Upgrades to the building, including:
 - Replacement of existing windows and doors with double and triple-glazed slimline aluminium framed units;
 - Replacement of roof coverings and insulation to the Office and Chapel roof areas, and installation of overlaid roof covering to the Service Yard building;
 - Replacement of existing single skin rooflights with triple skin polycarbonate to match existing profile; and
 - Application of expanded polystyrene insulation by injection method to external cavity walls of the Office building.

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

Installation of Solar PV

4.9 All proposed solar PV panels would be sited on the flat roof elements of the Service Yard building. Their location is detailed on drawing ref: 3390-CWC-XX-EX-DR-E-6100 and shown at **Figure 4.1**.

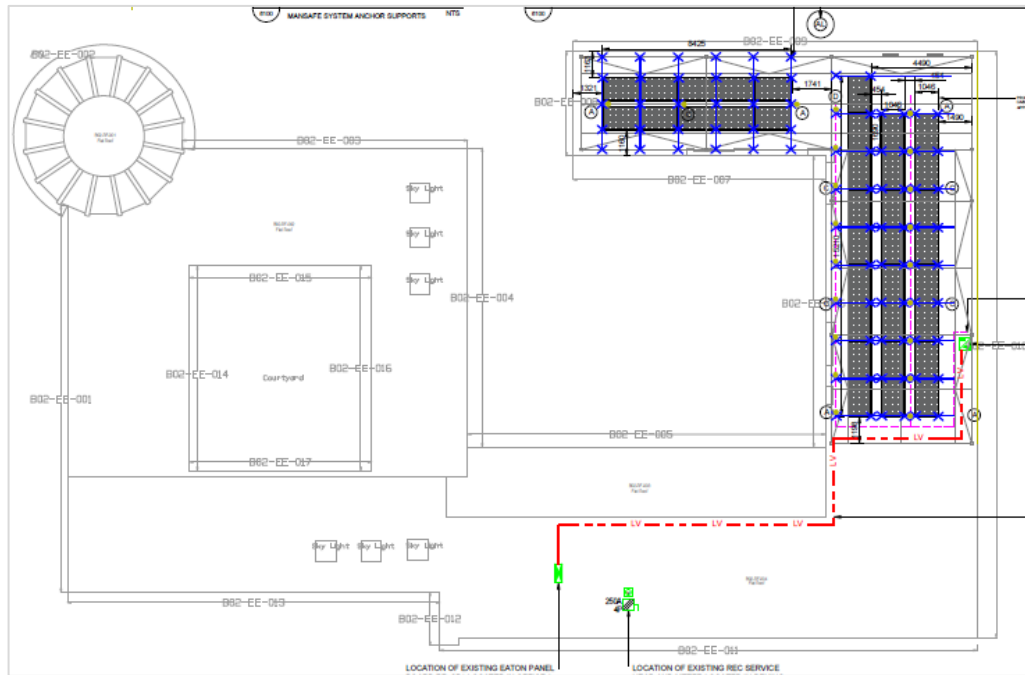


Figure 4.1: Drawing showing location of proposed solar PV array

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*

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*

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.

²⁸ *Ibid.*

- 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 has been amended and would be located away from this part of the building, to an area of lesser significance on the roof of the Service Yard building, to the rear of the Offices and Yard.
- 4.13 It is anticipated that the solar PV could be glimpsed in kinetic views from access roads in the cemetery, but existing tree coverage would filter this. Visual impact has been lessened by siting the solar PV array to an area of lower significance. Panels have been angled to face south westwards. The tilt of all panels has been reduced to 10° to minimise their visibility, whilst still retaining performance. Based on the information available at the time of drafting this Heritage Statement, it is concluded that, where visible, the solar PV would not detract from the composition of the principal south west facing elevation of the Chapel of Remembrance and Offices, or the appreciation of Blackley Crematorium, from these points.
- 4.14 The installation of the solar PV array is reversible if required to be upgraded or improved upon in the future.

Associated Mounting System

- 4.15 Structural Engineers were instructed to undertake an inspection and appraisal of the roof structure and supporting framework. The assessment and appraisal report ref: Y24127.02 concluded the construction of the woodwool roof decks would not have sufficient capacity to support the additional weight created by the PV panel systems, and consequently strengthening works or replacement roof structure would be necessary. In light of this, an over-roof low level steel framework is proposed to be installed above the roof deck (drawing ref: 24127-FMA-B2-ZZ-DR-S-0100) and at **Figure 4.2**), enabling the existing roof structure to be retained and the existing woodwool slab and steel roof trusses to remain in-situ.

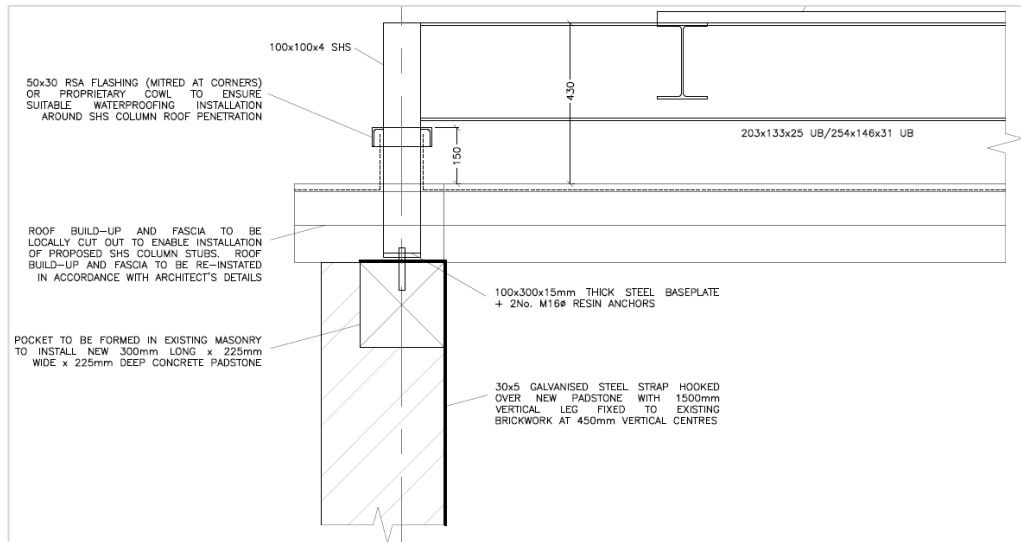


Figure 4.2: Cross section of proposed over-roof low level steel framework supporting PV

- 4.16 14 no. openings would be formed in the roof deck to insert steel column stubs to secure the beams of the steel framework 150mm above roof level. Pockets would be formed in the top section of internal load-bearing internal walls to install concrete padstones for fixing baseplates and columns. These new openings are small in diameter, limited in number and focussed on the roof deck at the rear of Blackley Offices and Yard.
- 4.17 The solar PV array would be secured to a supporting galvanised steel tilted framework mounted on the over-roof steel structure with suitable fixings to accommodate wind uplift, as detailed on drawing ref: 3390-CWC-XX-EX-DR-E-6100 and at **Figure 4.3**.

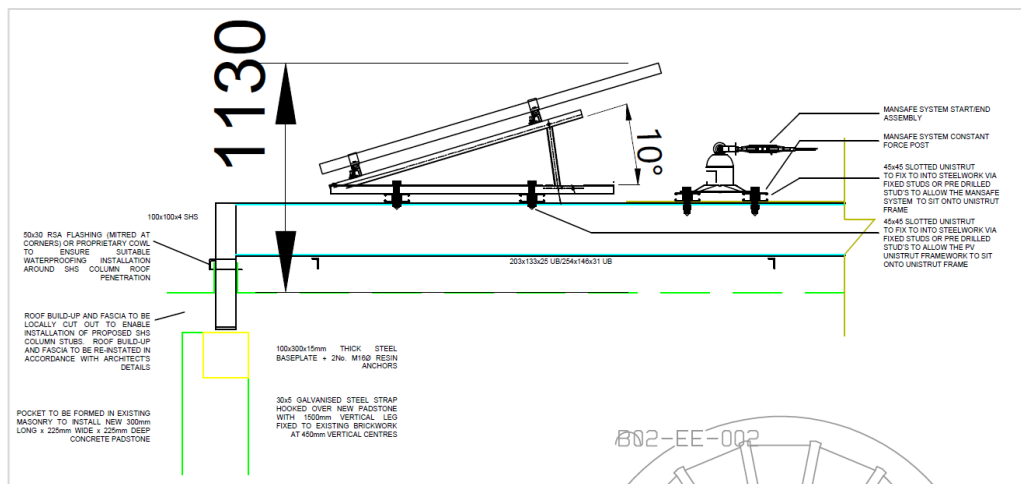


Figure 4.3: Cross section of proposed solar PV panels showing the associated framework

- 4.18 The roof steel framework support has been designed and assessed by the Structural Engineer to ensure that the additional weight imposed would cause no detriment to the existing structure. The additional weight of the proposed solar PV system will

continue to be assessed by the Structural Engineer as the design progresses to ensure that the additional weight imposed causes no detriment to the existing structure or proposed roof coverings (see paragraph 4.52 to 4.53).

Associated Cable Tray and Fixtures

- 4.19 Cables trays would be fixed to, and supported by, the over-roof steel framework, the route of which is shown on drawing ref: 3390-CWC-XX-EX-DR-E-6100 and at **Figure 4.1**. The cable tray and cables would penetrate the roof of the Office/Switch Room, which would require a small opening in the roof. Internal upgrades to the power layout would require small holes to be made at a high level through walls shown on drawing ref: 3390-CWC-XX-00-DR-E-6201.
- 4.20 This minimal intervention is proposed in an area of lower heritage significance and within the service areas of the building. Whilst the cable tray would be visible, it is located in an area of the building where existing cables already exist. These works are not inconsistent with the more functional and back of house areas of the building and it is not considered that it would be harmful.

Mansafe System

- 4.21 The Office and Service Yard roofs are predominantly flat. Installation of solar PV panels would require safe method of maintenance and fall protection. A constant force type mansafe system would be installed above the Service Yard roof areas, with posts secured to the over-roof steel framework structure with mechanical steel rivet fixings, detailed on drawing ref: 3390-CWC-XX-EX-DR-E-6100 and at **Figure 4.1** and **4.4**. This type of mansafe system would sit at a low height, ensuring that visibility of the system minimised and would not be visible in views north eastwards towards the principal elevation.

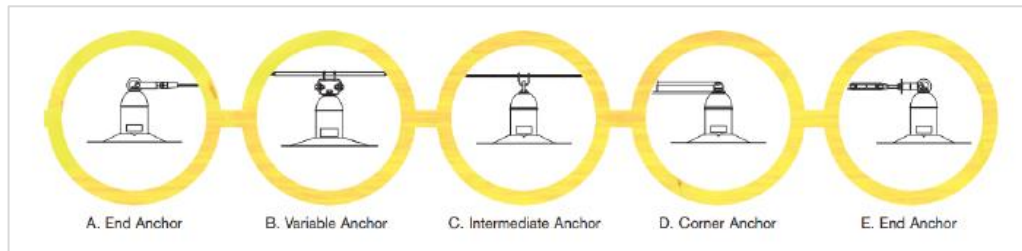


Figure 4.4: Proposed mansafe system (to be viewed in combination with Figure 4.1)

Ladder Access

- 4.22 To maintain the PV panels, permanent roof access would be required. A vertical fixed ladder would be installed to the north west elevation of the Service Yard to provide unrestricted access to maintain solar PV on the Service Yard roof area, as detailed on **Figure 4.1**. This location is of low sensitivity and existing tree coverage screens and filters views towards this functional and rear elevation of the building.
- 4.23 A retractable vertical ladder system is proposed that can be folded when not in use (**Figure 4.5**). This design ensures that, when the ladder is closed, it has a slim profile which would minimise visibility of the system. Roof areas with a climb height above 3m require fall protection. An overrail system is proposed in combination with the ladder

system which would be mounted 1m above the roof parapet for the operative to safely harness on to. This would have a slimline appearance, as shown on **Figure 4.5**, which minimises the visibility of the overrail system. The ladders and overrail system would need to be attached to an external wall with mechanical steel anchor fixings.

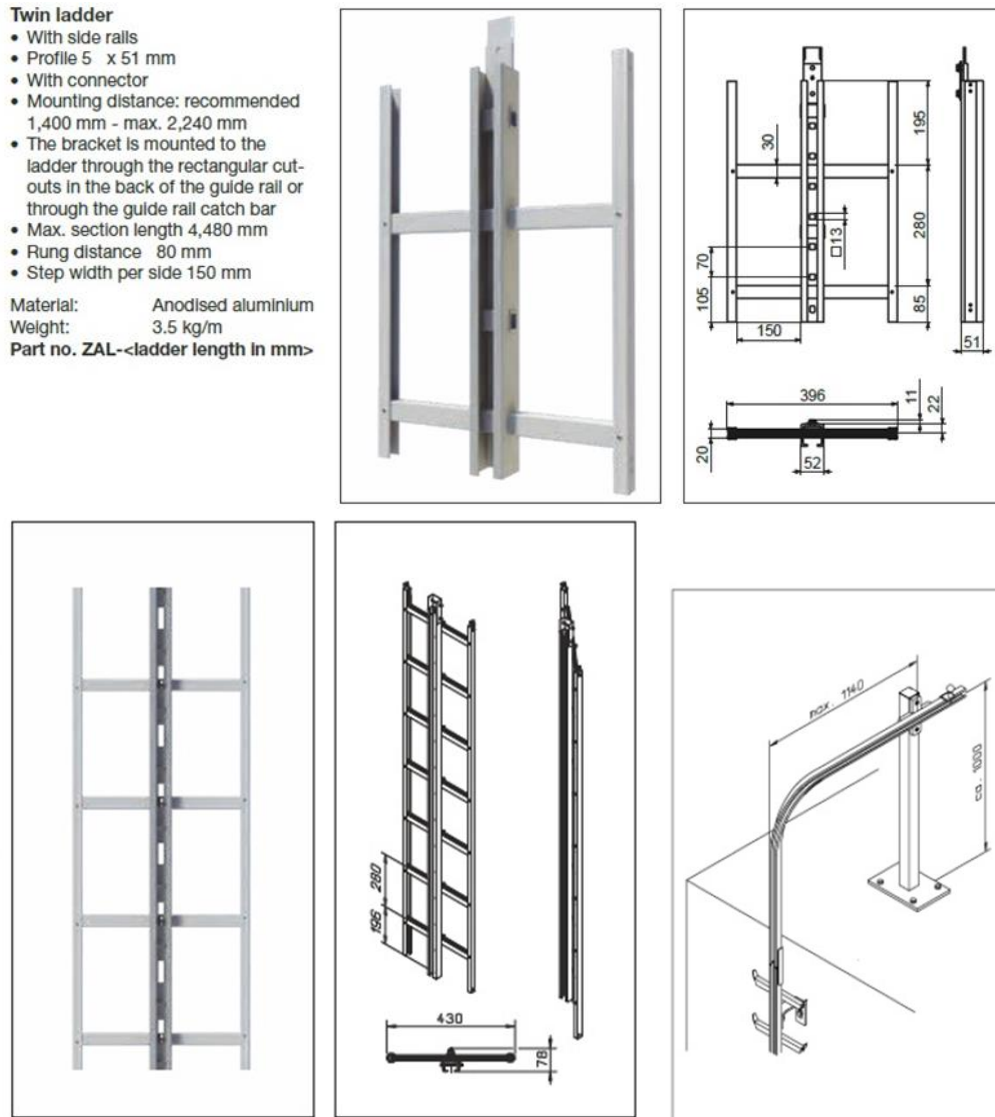


Figure 4.5: Detail of foldable ladder and overrail system proposed for ladder access

Installation of ASHP

4.24 In line with Historic England's Advice Note 18, paragraph 94, states:

"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."*²⁹

4.25 A high-temperature ASHP would be installed, meaning that no additional internal upgrades would be required, and existing internal plumbing and radiators would be retained.

4.26 ASHPs are to be installed externally to a discreet location at the rear north east facing elevation of the Storage Yard building, shown on drawing ref: 3390-CWC-XX-ZZ-DR-M-5001 and at **Figure 4.6**. The ASHPs would not be fixed to the building. The location has a slight slope and would be excavated with ground supported concrete slab constructed to provide a level base to support the ASHPs. The location is a sloping site and concrete pad foundations would be installed to support a galvanised steel framework to provide a level base for the ASHPs.

4.27 The proposed location of the ASHPs is discreet and as a result of existing tree coverage, visibility of the ASHP and enclosure would be limited to immediate surroundings. This location ensures that the ASHPs and any associated fixtures or infrastructure would not be visible from the south west of the building or in combination with the principal elevation of the Offices and Yard, and key views of Blackley Crematorium would be unaffected. An enclosure compound would screen the ASHPs.

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

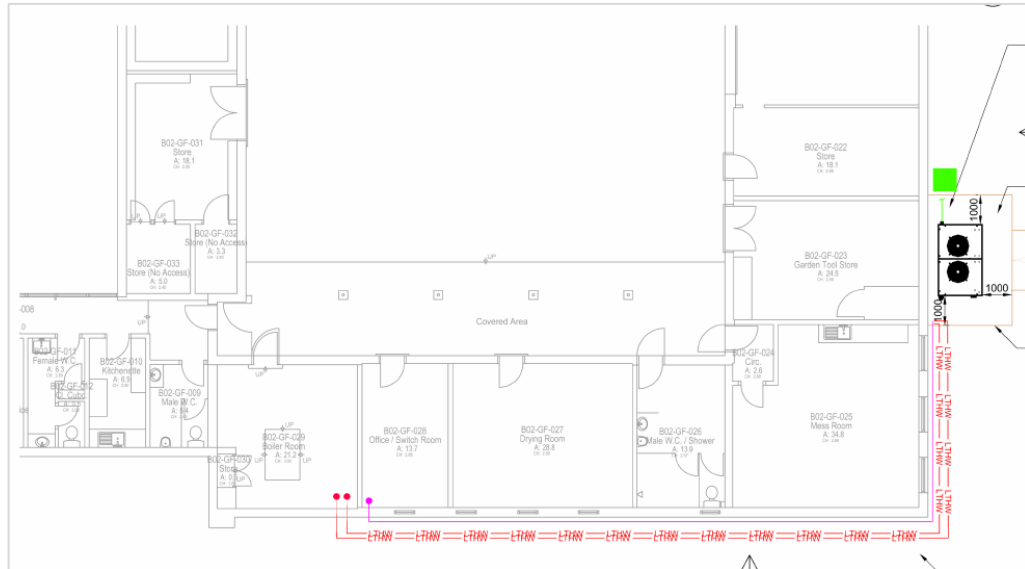


Figure 4.6: Proposed location for ASHP and enclosure

ASHP Enclosure Compound

- 4.28 Acoustic fencing enclosure to a height of 2.5m is proposed to conceal the ASHPs. The fencing would be constructed independently and would not be fixed to the building. The enclosure compound is proposed to be constructed with Jakoustic Absorptive fencing system. Fence posts would be set in concrete with 800mm embedment. Timber gates would be within the north east elevation to provide maintenance access to the compound.
- 4.29 The enclosure ensures that the ASHPs would be screened. Whilst the enclosure would be visible in combination with the rear aspects of the Service Yard buildings, this part of the building does not contribute to the special interest of Blackley Crematorium. The siting of the enclosure and existing tree coverage screens visibility, thereby minimising the visual impact of the enclosure.

Associated Pipework and Fixtures

- 4.30 The route of associated pipework is coloured red on drawing ref: 3390-CWC-XX-ZZ-DR-M-5001 and at **Figure 4.6**. Pipework would exit the enclosure compound to the south east and follow the north east elevation of the Service Yard building. It would then follow the south east elevation where it would penetrate the external wall of the Boiler Room at two points, with a maximum clearance opening of 200mmØ each. This is detailed further on drawing ref: 3390-CWC-XX-ZZ-DR-M-5001 and at **Figure 4.7**. This aspect of the proposal involves creating minor openings. These are however small in diameter, limited in number and focussed along the bottom of walls of low sensitivity.
- 4.31 The route of the power cable is coloured purple on drawing ref: 3390-CWC-XX-ZZ-DR-M-5001 and at **Figure 4.6** and **4.7**. The power cable would follow the same route as the pipework, but would penetrate an external wall of the Office/Switch Room, with a maximum clearance of 200mm. Similar to the pipework installation, this aspect of the proposal involves creating one opening. This is small in area and focussed on a wall of low sensitivity.

- 4.32 The pipework and power cable would be protected via a pipework protection cover, which would screen visibility of these elements. This would be attached to exterior north east and south east walls, as detailed on drawing ref: 3390-CWC-XX-ZZ-DR-M-5001 and at **Figure 4.7**. This would have a width of 700mm, which is required to allow for spacing between pipework and cables. Whilst the protective cover would be visible, this part of the building has a dense area of existing tree coverage, and visibility is reduced to its immediate surroundings. These works are not inconsistent with the more functional and back of house areas of the building and it is not considered that they would be harmful.

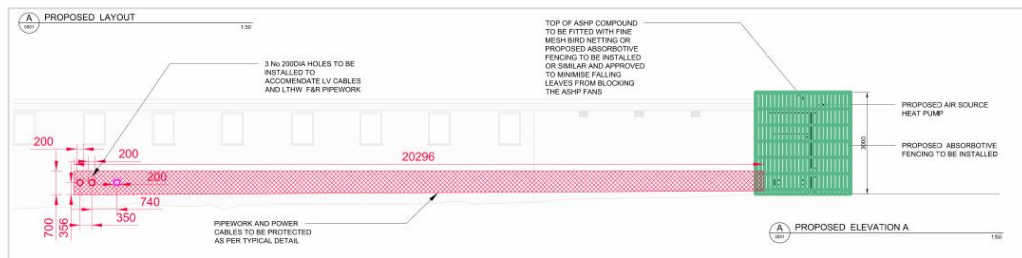


Figure 4.7: Proposed openings for associated pipework and power cable

Additional Associated Works

- 4.33 All existing non-original gas boilers would be removed from the Plant Room. These do not contribute to the special architectural or historic interest of the building.³⁰
- 4.34 A lightning protection system is proposed around the perimeter of the roof as shown on drawing ref: 3390-CWC-XX-EX-DR-E-6900. The lightning protection systems uses aluminium conductor tape, which would be barely perceptible.

Building Upgrades

Replacement Windows and Doors

- 4.35 It is noted in Historic England's Advice Note 18, paragraph 82, that:

"Replacement of windows which do not contribute to the architectural or historic interest of a building with double-glazed windows of appropriate material and pattern, will generally be acceptable.

- *Many historic buildings have windows which are relatively recent and do not contribute to a building's special interest. In such cases, their replacement with double-glazed windows of an appropriate material, glazing bar pattern and detailing is likely to either have a neutral impact or to enhance significance.*
- *This will not be so in the case of original or other windows which contribute positively to a building's special interest through both historic fabric and design. Such windows should not be replaced (although their panes could be replaced with slim-profile or vacuum double-glazing within the existing frames. Stuck-on*

³⁰ Historic England (2014) Blackley Crematorium Official List Entry

or applied glazing bars rarely replicate the character of historic windows and are unlikely to be acceptable.”³¹

- 4.36 A number of windows are proposed to be replaced, including original windows on north west and south east facing elevations of courtyard (**Figure 4.8**), the north east, north west and south east elevations of the Service Yard building (**Figures 4.9 and 4.10**). uPVC windows on the north west elevation of the Offices would also be replaced. The locations and designs of these windows are shown on drawings 24606.102 and 24606.105, and at **Figures 4.11 and 4.12**.



Figure 4.8: Original windows to the courtyard of the Offices

³¹ Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency. pg. 21.



Figure 4.9: Original windows to the north west elevation of the Service Yard building



Figure 4.10: Original windows to the south east elevation of the Service Yard building

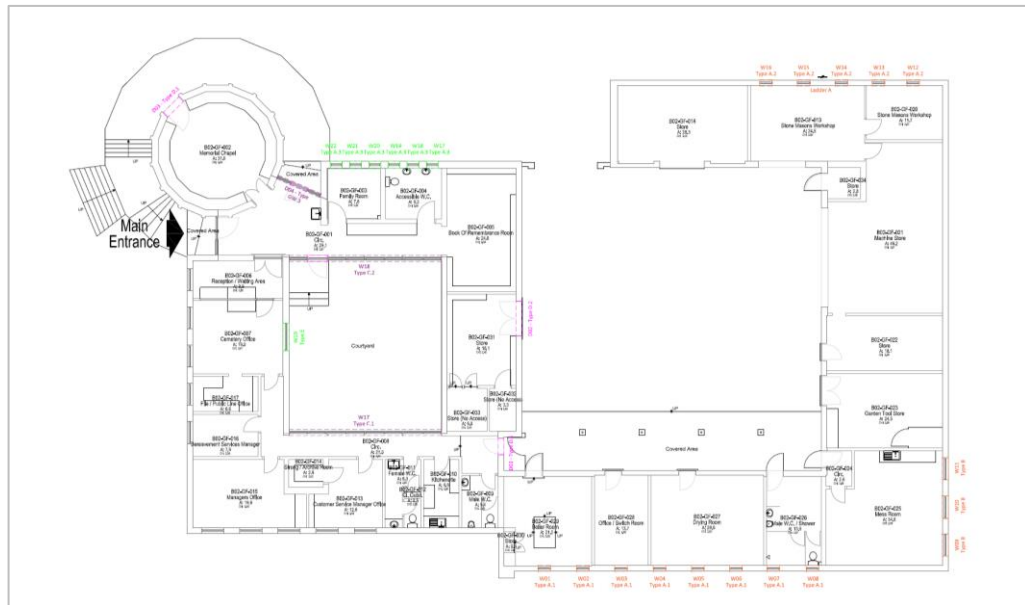


Figure 4.11: Elevations showing proposed replacement windows and doors (to be viewed in combination with Figure 4.12)

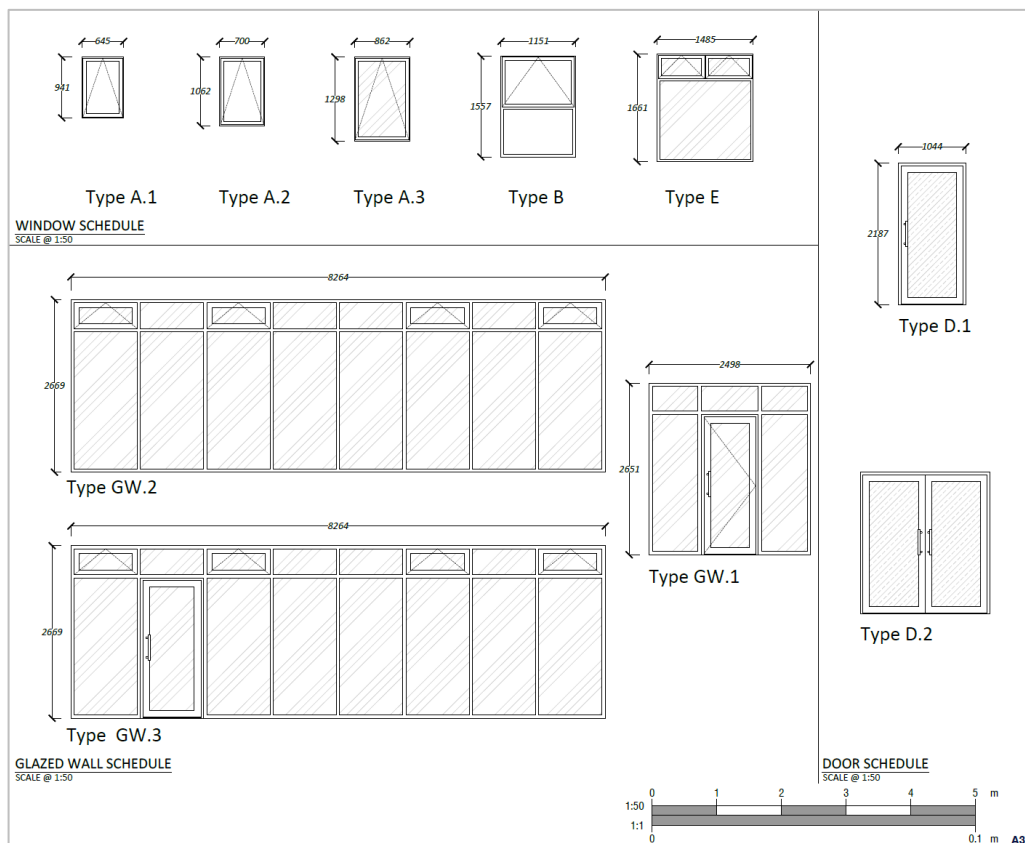


Figure 4.12: Proposed window and door schedule (to be viewed in combination with Figure 4.11)

Service Yard Building Windows

- 4.37 The Service Yard building has 16 no. original casement windows the north east, north west and south east elevations with single glazing throughout. These are in a varied condition, with some missing glazing and indication of decay to the frames. Beyond their original fabric, their overall form and composition make a limited contribution to the architectural and historic interest of the building.
- 4.38 Existing windows would be removed and replaced with double-glazed slimline units with aluminium frames and are designed to match existing. The locations of the replacement windows are shown on drawing ref: 24606.105 and at **Figure 4.9**.

Windows to the Courtyard

- 4.39 The courtyard has 16 no. original timber-framed windows with single glazing throughout and original hardware. These are in varied condition with indication of decay to the frames. Beyond their original fabric, their overall form and composition make a limited contribution to the architectural and historic interest of the building.
- 4.40 Existing windows would be removed and replaced with double-glazed slimline glazing walls with aluminium frames and glazing bar patterns designed to match existing. The locations of the replacement windows are shown on drawing ref: 24606.105 and at **Figure 4.9**.

Rooflights

- 4.41 There are 6 no. existing single skin rooflights. These are proposed to be replaced with triple skin polycarbonate to match existing pyramid profile, as detailed on drawing ref: P24606.108. The existing rooflights are of a low sensitivity and do not contribute to the significance of the building.

uPVC Windows

- 4.42 6 no. uPVC windows would be replaced with triple-glazed slimline units with aluminium frames, designed to match existing openings. These replacement windows do not contribute to the building's significance. Their replacement with a higher quality material and more sympathetic material is a benefit, and would result in a consistent appearance throughout the building.

Doors

- 4.43 A total of 4 no. doors are also proposed to be replaced, including:
- Original door to the north west elevation between the Chapel of Remembrance and Offices (**Figure 4.11**). The door handle may be original and stylistically corresponds with other aspects of the building;
 - Non-original external shutter and door to the north east of the Offices (facing the Service Yard); and
 - Non-original door to the north west of the Chapel of Remembrance.



Figure 4.13: Original door to the north west elevation between the Chapel of Remembrance and Offices

- 4.44 The original door between the Offices and Chapel would be replaced with a double-glazed slimline aluminium glazing wall and door, with glazing bars to match the existing proportions and composition. The internal steel decorative plant holder would be re-installed using equivalent fixings to the existing, following the installation of the new glazed wall and door.
- 4.45 The non-original doors and external shutters would be replaced with solid insulated doors with profile and size to match the existing openings.

Impact of Replacement Windows and Doors

- 4.46 It is recognised that the removal of original windows and doors would result in 'less than substantial harm' in NPPF terms to the building's significance, and would be at the lowest end of this category. Harm has been minimised through the design of the windows, which have been designed to replicate the design and proportions of the existing windows. The replacement of original windows is confined to the side and rear aspects of the Service Yard building and the courtyard of the Offices. Comparison of historic photographs from the 1960s (**Figures 3.6 and 3.7**) demonstrate that a number of other windows and doors across the building have already been replaced, including windows to the south east and south west elevations of the Offices.
- 4.47 6 no. replacement windows are uPVC which do not contribute to the building's significance. Their replacement with a higher quality material and more sympathetic material is a benefit, and would result in a consistent appearance throughout the building.

- 4.48 The replacement of non-original doors, rooflights and uPVC windows would result in a consistent appearance across the building, and would not cause harm to its significance.

Cavity Wall Insulation

- 4.49 Historic England's Advice Note 18, paragraph 90 states:

"Installation of insulation within external walls will be acceptable in some cases.

- Some types of listed building may be capable of accommodating insulation between their outer protective surface and their inner wall surfaces to improve thermal performance. Examples include those which are timber-framed, clad with finishes such as weather-boarding or built with cavity wall construction. [...]*
- Modern cavity walls (in post-Second World War buildings) often provide a good opportunity for insulation. Such insulation is invisible, cheap and quick to install, with no reduction to room sizes.*
- Standard cavity insulation is not suitable in every case, however. For example, for those classed as 'early cavity walls' the construction needs to be treated as a solid wall, insulated either internally or externally."³²*

- 4.50 Expanded polystyrene (EPS) beads would be injected to fill the cavity of external walls to the Offices, as shown on drawing ref 24606.102 and at **Figure 4.14**.

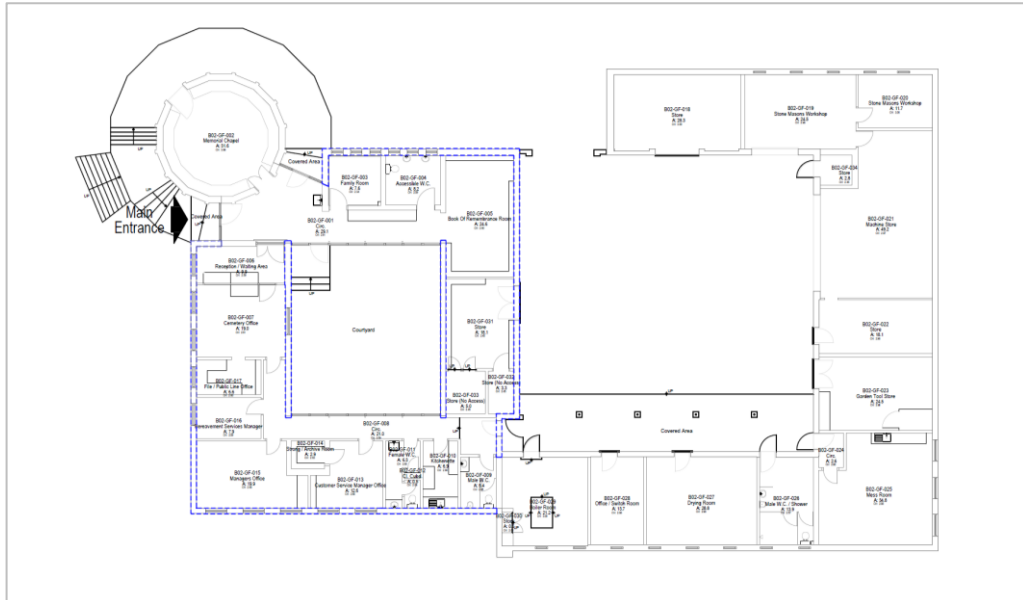


Figure 4.14: Floor plan showing the location of proposed cavity wall insulation (outlined in blue)

- 4.51 Small holes 22mmØ, would be drilled between bricks at the junction between horizontal and vertical mortar joints. The installation would be conducted in accordance with guidance to ensure that there is no risk to weakening the wall

³² Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency. pg. 25.

structure and cavities are fully filled. Insulation would be applied as not to bridge the existing damp proof course that could cause dampness into the building. The building dates to 1959 and is not an example of 'early cavity walls'. This aspect of the proposal involves creating small holes in existing mortar to conduct the insulation process. These are however small in diameter and focussed on areas of very low sensitivity. It is not considered that these works would be harmful.

Roof Coverings/Insulation

4.52 Historic England's Advice Note 18, paragraph 86 states:

"Insulation within the roof plane will be acceptable in some cases.

- *Roof spaces can often be insulated above, between or below the rafters.*
- *Exceptions will include cases in which this would require the loss of historic plasterwork or obscure significant elements of the roof structure.*
- *Care needs to be taken when insulating above rafters to protect the historic character of the roof.*
- *However insulation is installed, permeable materials should be used and the roof should remain ventilated to avoid condensation.*"³³

4.53 An inspection of the flat roof coverings concluded that existing bituminous membrane roof coverings are in varying degrees of condition with sufficient insulation to Service Yard building and below the recommended thermal requirements for Office and Chapel as indicated within the Roof Condition Report ref: 10134951.

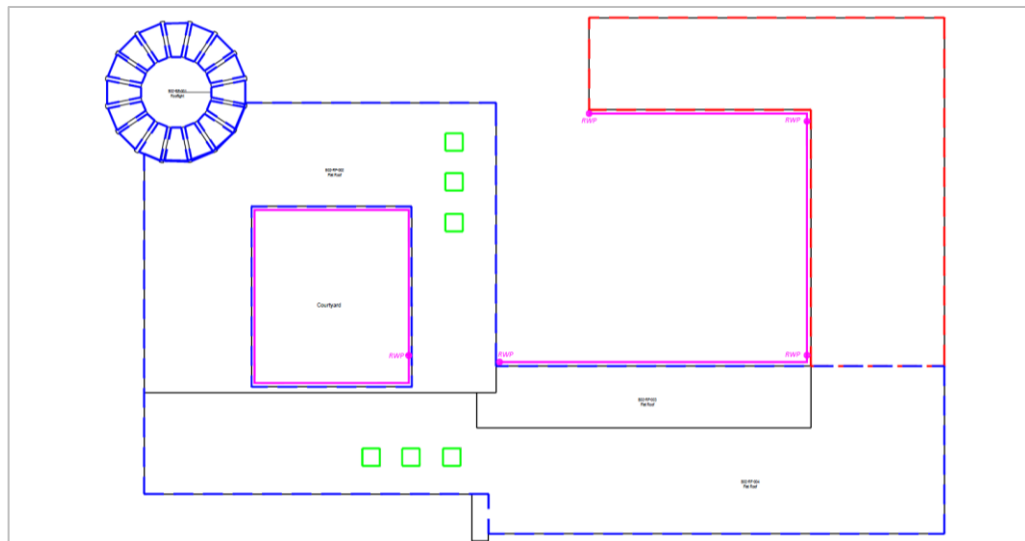


Figure 4.15: Roof plan showing proposed locations of replacement roof coverings (refer to drawing 24606.108 for further detail)

4.54 Existing insulated roof coverings over the Service Yard building would remain in-situ and overlaid with a vapour layer and high tensile mineral felt bitumen membrane

³³ Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency. pg. 22.

system, as shown on drawing ref 24606.108 and at **Figure 4.15**. Steel column stub penetrations through the roof structure are to be made good and sealed with upstand detail formed in accordance with Icopal Specification ref: 10134951. The installation of an overlaid roof covering would involve creating small openings in the roof structure. These are limited in number and are confined to areas of low sensitivity. This approach would minimise the removal of original fabric.

- 4.55 Office and Chapel roof areas would be stripped back to the decking with insulation removed and a new built-up mineral felt roof system would be applied over 130mm thick insulation. This aspect of the proposal would see the replacement of the existing roof covering to the Office and Chapel. The overall character and design of the roof would be retained, and it is not considered that the installation of insulation would be harmful.

Summary

- 4.56 The proposed solar PV array and ASHP are confined to the rear functional areas and roof of the Service Yard building. Effects on original fabric in relation to these works are limited in number and size and only occur where pipework, power cables or cable trays enter the building, and where associated infrastructure is fixed to exterior walls. Visibility of these aspects the Proposed Works has been minimised or avoided where possible to ensure that the effect of these in views north east of the principal elevation is minimised. All holes and fixing systems will be sensitively undertaken with due regard for the structure of the building fabric. It is considered that these aspects of the Proposed Works are unarmful to the building and the special interest of the listed building is sustained.
- 4.57 A degree of harm has been identified in relation to the proposed replacement windows and doors. The replacements are confined to areas of lesser significance, and have been designed to have due regard to the overall architectural character of the building and reflect existing designs. Existing uPVC windows and an external shutter would be replaced with more sympathetic units and their replacement is beneficial. The works would also result in a consistent appearance throughout the building.
- 4.58 Further information and specifications of the proposed solar PV, ASHP, mansafe system, ladder access and living wall enclosure are detailed within the accompanying Design and Access Statement and Method Statement.

Statutory Duty and National and Local Planning Policy

- 4.59 The Proposed Works to decarbonise Blackley Offices and Yard have been carefully considered and have also been informed by pre-application discussions with MCC planning and conservation officers.
- 4.60 The Proposed Works have been designed to reduce and minimise harm to Blackley Offices and Yard and the Grade II Listed Blackley Crematorium. The proposed solar PV and ASHP at Blackley Offices and Yard are located in areas of least significance, and alteration of original fabric in relation to these works has been kept to a minimum. Any visibility of these aspects of the Proposed Works have been designed to avoid harm to the listed building.

- 4.61 It is recognised that there would be a degree of harm to Blackley Offices and Yard and the Grade II Listed Blackley Crematorium resulting from the replacement of original windows and doors. Replacement windows and doors have been designed to replicate the design and proportions of the existing windows, and would be sympathetic to the architectural character of the building, minimising harm to the building. This is considered to be ‘less than substantial’ and at the lowest end of this 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.”³⁴

- 4.62 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.
- 4.63 As identified above, a very low level of less than substantial harm has been identified in relation to the significance of Blackley Offices and Yard and Grade II Listed Blackley Crematorium. 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 sought to minimise harm to the significance of heritage assets and where harm has been identified, 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.
- 4.64 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. Blackley Offices and Yard 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.

³⁴ MHCLG (2024) National Planning Policy Framework (NPPF), Paragraph 215

5. Summary and Conclusions

- 5.1 This Heritage Statement has been prepared by Turley Heritage on behalf of Manchester City Council ('the Applicant') in support of a full planning application and application for listed building consent (LBC) for alterations, including the installation of Air Source Heat Pumps (ASHPs) and solar PV panels ('the Proposed Works') to the curtilage listed Blackley Offices and Yard, Victoria Avenue, Blackley, Manchester ('the Site'), which is a part of the Grade II Listed Blackley Crematorium.
- 5.2 The Proposed Works form 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 roof mounted solar PV and replacing gas boilers with Air Source Heat Pumps.
- 5.3 In determining the submitted planning application and 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.³⁵ 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.
- 5.4 The Proposed Works have been designed to reduce and minimise harm to Blackley Offices and Yard and the Grade II Listed Blackley Crematorium. The proposed solar PV and ASHP at Blackley Offices and Yard are located in areas of least significance, and alteration of original fabric in relation to these works has been kept to a minimum. Any visibility of these aspects of the Proposed Works have been designed to avoid harm to the listed building.
- 5.5 It is recognised that there would be a degree of harm to Blackley Offices and Yard and the Grade II Listed Blackley Crematorium resulting from the replacement of original windows and doors. Replacement windows and doors have been designed to replicate the design and proportions of the existing windows, and would be sympathetic to the architectural character of the building, minimising harm to the building. This is considered to be 'less than substantial' and at the lowest end of this category. 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

³⁵ Sections 16(2) and 66(1)

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, a very low level of less than substantial harm has been identified in relation to the significance of Blackley Offices and Yard and Grade II Listed Blackley Crematorium. This partially conflicts with PfE Policy JP-P2, the objective of CS 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 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. Blackley Offices and Yard 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

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.”

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. 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.

Turley Office

Level 5, Transmission
6 Atherton Street
Manchester
M3 3GS

T 0161 233 7676