Heritage Statement

Blackley Crematorium, Victoria Avenue, Blackley, Manchester

December 2024

Turley
Heritage

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Client
Manchester City Council

Our reference
01715

November 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 Grade II Listed Blackley Crematorium, Victoria Avenue, Blackley, Manchester ('the Site').

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 Crematorium, 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. 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], 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 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 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."[8]



Figure 2.1: Plan showing the location of the Grade II Listed Blackley Crematorium

2.4 Based on the disposition of the Proposed Works, the nature of interposing landscape and topography, when considered together with the individual significance of other

[7] MHCLG (2024) National Planning Policy Framework (NPPF) – Annex 2: Glossary
[8] Historic England (2014) Blackley Crematorium Official List Entry

heritage assets, it was considered that no other heritage assets (designated or non-designated) would be impacted by the Proposed Works.

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.

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."[12]

3.5 Historic England has published guidance[13] 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:

[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
[12] MHCLG, National Planning Policy Framework (NPPF) 2024 – Annex 2: Glossary
[13] 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."[14]

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)



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.

[14] 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

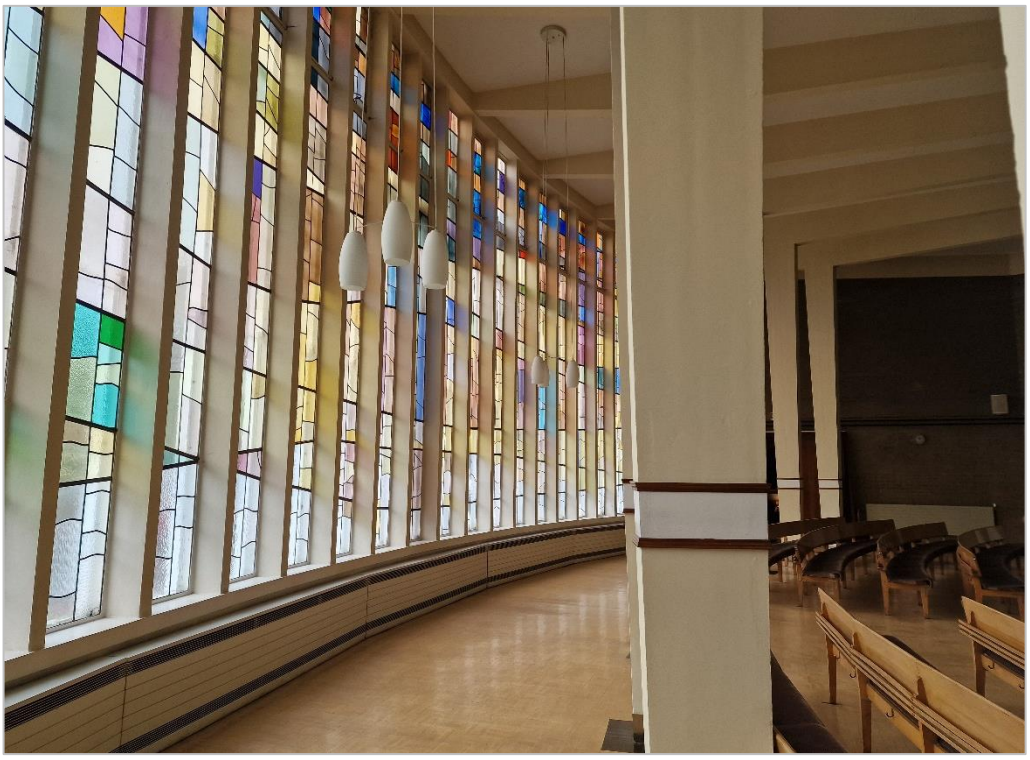


Figure 3.3: Interior of the main chapel of Blackley Crematorium showing stained glass

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.[15]

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

[15] 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.

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.[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.

4.2 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.

[16] 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 Crematorium, consist of the following:

- Installation of 34 no. roof mounted Solar PV panels to the Central Chapel and 16 no. panels to the East Chapel;
- Removal of existing gas boilers and installation of a high temperature Air Source Heat Pump (ASHP) to the north of the Plant Area enclosure, including formation of concrete base and framework support, with associated pipework connections;
- Formation of ASHP compound enclosure up to 2.9m in height, comprising living green wall with gated access including foundation support;
- Associated works for access and maintenance requirements for the Solar PV, including mansafe system, and fixed ladders to external walls areas.

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

Installation of Solar PV

4.9 A total of 34 no. roof mounted solar PV panels would be located on the Central Chapel, and an additional 16 no. panels would be located on the East Side Chapel. All solar PV panels would be sited on the flat roof elements of the Chapels behind a parapet. Their location is detailed on drawing ref: 3384-CWC-XX-EX-DR-E-6100 and shown at **Figure 4.1**.

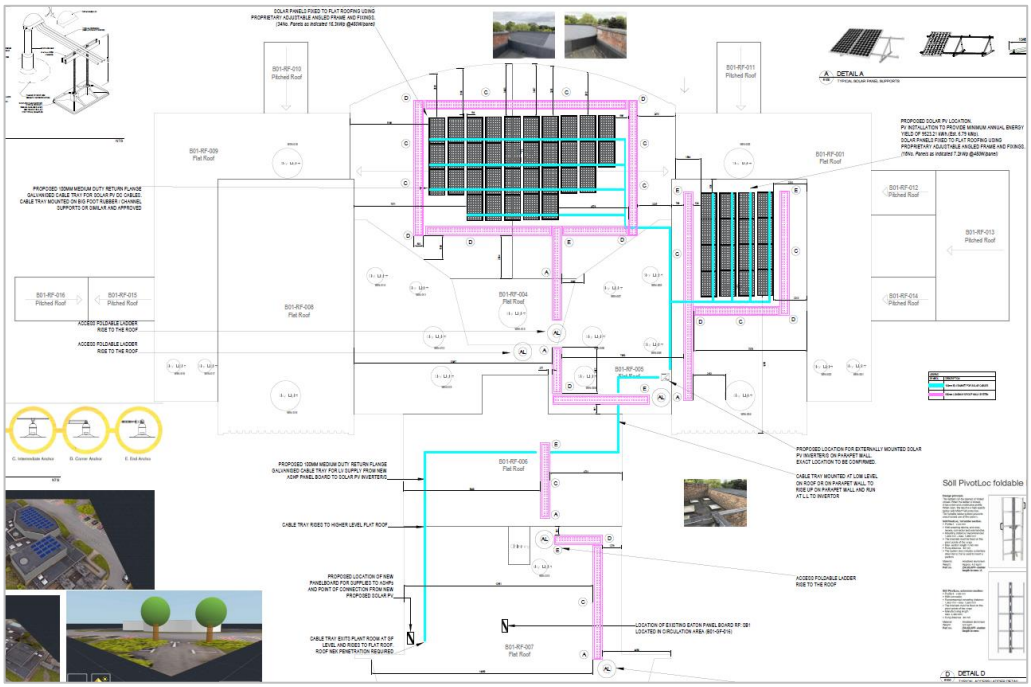


Figure 4.1: Drawing showing location of proposed solar PV array

4.10 Historic England have recently published Historic England Advice Note 18 'Adapting Historic Buildings for Energy and Carbon Efficiency'[17], 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."*[18]

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."*[19]

4.12 The tilt of the solar PV panels has been reduced to 10° to minimise their visibility behind the parapet, whilst retaining performance. Based on information available at the time of drafting this Heritage Statement, it is unclear but possible that the proposed PV panels would be visible rising above the parapet of the Central and East Chapels in principal views from the north east, looking south westwards. Visual impact has been lessened by reducing the tilt to 10° and by positioning the panels westwards on the roof, however if visible there would be a degree of harm to the significance of the listed building due to disruption of the clarity of the design and simplicity of the roofline and parapet. Due to the embedded mitigation measures applied, any visual impact is likely to be minimal. Visibility of the PVs would reduce and they would eventually be screened in views closer to the building. It is concluded that this potential low level of visibility would cause less than substantial harm, of a low level.

4.13 Structural Engineers were instructed to undertake an inspection and appraisal of the roof structure and supporting framework. It was concluded that the additional load associated with installation of PV panels would not affect the structural integrity of the building, and no additional strengthening works would be required. The additional weight of the proposed PV system would continue to be assessed by the Structural Engineer as the design progresses to ensure that the additional weight causes no detriment to the existing structure or roof coverings.

[17] Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency
[18] Historic England (2024) Historic England Advice Note 18, Adapting Historic Buildings for Energy and Carbon Efficiency. pg. 30.
[19] *Ibid*.

Associated Mounting System, Cable Tray and Fixtures

4.14 The solar PV array would be secured to a supporting galvanised steel tilted framework mounted on rubber feet, providing soft contact with the roof, and held in place with ballast. Cable trays would also be supported on rubber feet mounted at a low level on roofs and over parapets. The use of this system would not require any fixings to penetrate the roof covering or additional structure in relation to the solar PV mounting or cable tray. This approach means that no original fabric would be removed, and the solar PV would sit independently to the roof.

4.15 From the solar PV array, the cable tray would then follow the roof westwards, mounted at a low level on the roof or rear facing parapet wall, before turning to penetrate the roof to the Plant Room with an opening of 300mm x 200mm. The location of this is shown in blue on drawing ref: 3384-CWC-XX-EX-DR-E-6100 and shown at **Figure 4.1**.This minimal intervention is proposed in an area of lower heritage significance and within the service area of the building.

4.16 The route of the cable tray is confined to the rear elevations 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 listed building and it is not considered that they would be harmful.

Mansafe System

4.17 The Chapel roofs are flat with stepped levels and the Central Chapel roof is formed on a slight incline. 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 Central and East Chapel roofs, with posts secured to the concrete roof structure with mechanical steel anchor fixings, detailed on **Figure 4.2**. Associated walkways would be installed to the roof to provide access to the solar PV array, the location of which is shown coloured pink on drawing ref: 3384-CWC-XX-EX-DR-E-6100 and at **Figure 4.1**. This type of mansafe system would sit at a lower height to the existing parapet, ensuring that the system is not visible.

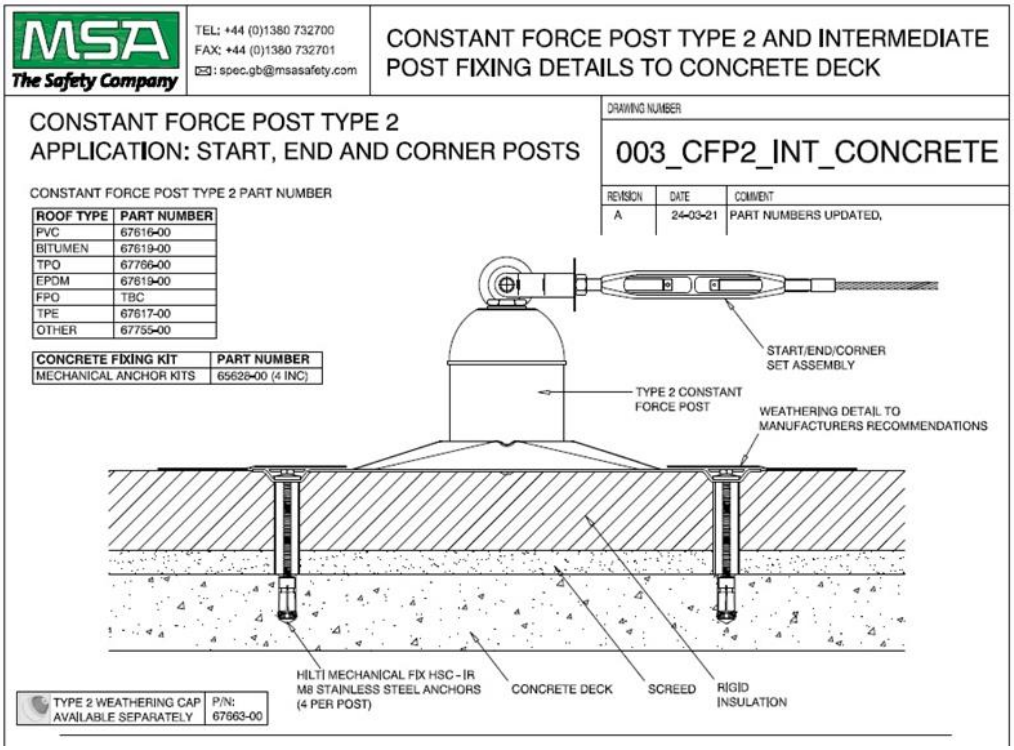


Figure 4.2: Detail of mansafe fixing detail (provided in the Design and Access Statement)

4.18 The posts for the mansafe system would be fixed to an area of roof that was replaced in 2015 and is not the original covering.

Ladder Access

4.19 To install and maintain the PV panels, permanent roof access is required. Vertical fixed ladders would be installed at various locations to provide unrestricted access to maintain solar PV on the Central and East Chapel roofs. To minimise visibility from the key designed view of the principal elevation, ladders would be fixed to the rear walls only, as detailed on drawing ref: drawing ref: 3384-CWC-XX-EX-DR-E-6100 and shown at **Figure 4.1**.

4.20 A retractable vertical ladder system is proposed that can be folded when not in use (**Figure 4.3**). 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 4.3**, which minimises the visibility of the overrail system. The ladders and overrail system would need to be attached to external walls and parapets with mechanical steel anchor fixings.

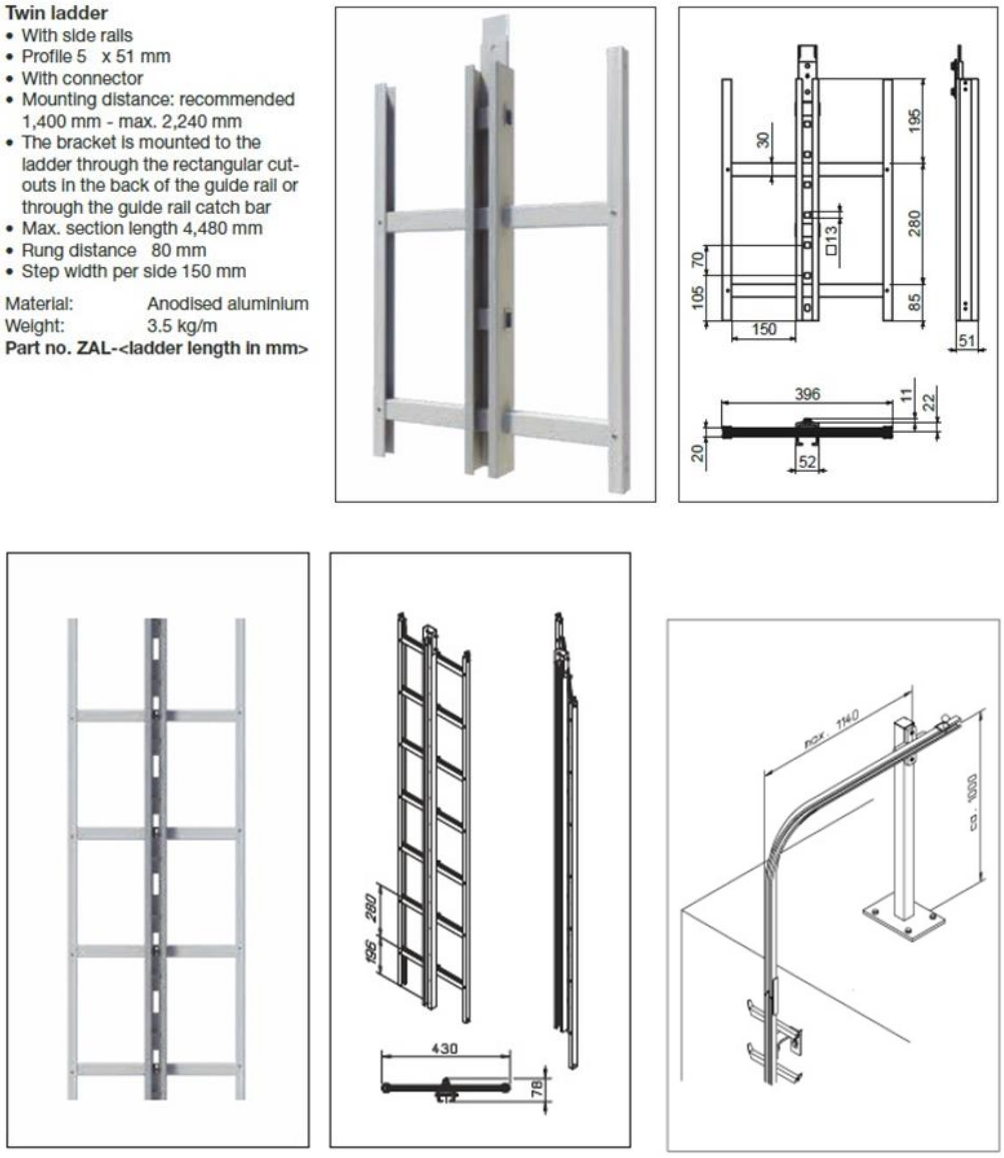


Figure 4.3: Detail of foldable ladder and overrail system proposed for ladder access

Installation of ASHP

4.21 Guidance in Historic England's Advice Note 18, paragraph 94, states that:

4.22 *"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*."[20]

4.23 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.

4.24 Various options have been explored to identify the most suitable location for the ASHP. Broadly, this has included the following:

- Within the existing Plant Room: this was not practically possible as the specified high-temperature ASHPs would not fit in the Plant Room and require increased ventilation to operate.

- Located to the roof, positioned centrally above the main 'working area': the weight of the units to the roof would be too much in terms of structural loadings. This location would require considerable intervention to support the additional weight of the ASHP.

- External location to the north of the Plant Area enclosure: this is the preferred option.

4.25 The proposed ASHPs would be installed externally to an area of existing hardstanding to the north of the Plant Area enclosure, shown on drawing ref: 3384-CWC-XX-00-DR-N-4001 and at **Figure 4.4**. The ASHPs would not be fixed to the building. 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.

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

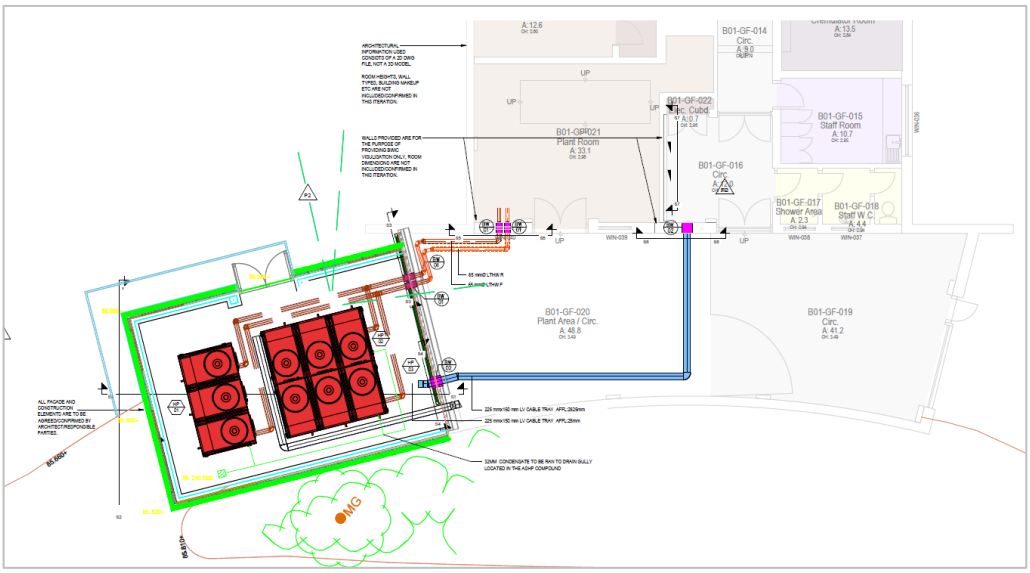


Figure 4.4: Proposed location for ASHP and enclosure

4.26 The proposed location of the ASHPs is discreet. This location ensures that the ASHPs and any associated fixtures or infrastructure would not be visible from the north east of the building or in combination with the principal façade. An enclosure compound would screen the ASHPs.

ASHP Enclosure Compound

4.27 Various options for the materiality of the ASHP enclosure have been explored, including hit-and-miss brick, timber and a living green wall. The preferred and proposed option is a living green wall enclosure.

4.28 The main structure forming the living green wall would be constructed in solid brickwork supported by concrete footings. The living green wall would be constructed independently, and would not be fixed to the existing Plant Area wall. The brick wall enclosure would receive plants on all three sides with a Biotecture system. A built-in self-watering irrigation system would be installed to ensure the plants are maintained. Timber gates would be located on the east elevation to provide maintenance access to the compound.

4.29 Whilst the enclosure would be visible in combination with the rear functional aspects of the Crematorium, this part of the building makes a minimal contribution to its special interest. The enclosure ensures that the ASHPs would be screened and the use of a living wall corresponds with the natural elements of the memorial garden to the rear of the Crematorium, thereby minimising the visual impact of the enclosure.

Associated Pipework and Fixtures

4.30 The route of associated pipework is coloured orange on drawing ref: 3384-CWC-XX-00-DR-N-4001 and at **Figure 4.4**. Pipework would penetrate an external wall of the Plant Area enclosure at two points, with a maximum clearance opening of 200mmØ each. The proposed pipework would then follow the wall shared with the Plant Room. Pipework would also penetrate the rear external wall of the Plant Room at low level with a maximum clearance opening of 200mmØ. This is detailed further on drawing

ref: 3384-CWC-XX-00-DR-N-4001 (S5 and S6) and at **Figure 4.5**. This aspect of the proposal involves creating minor openings. These are however small in diameter, limited in number and focussed on two walls of low sensitivity.

4.31 The route of the cable tray is coloured blue on 3384-CWC-XX-00-DR-N-4001 and at **Figure 4.5**. A cable tray opening would be required at a maximum size of 350mm x 350mm where the cable tray would enter the building at the external north wall of the Plant Area enclosure. The cable tray would follow the western wall of the Plant Area enclosure at a height of 2875mm before connecting through the shared wall with the Circulation Area, where an additional cable tray opening of 300mm x 300mm would be formed to the shared wall of Circulation Area. Similar to the pipework installation, this aspect of the proposal involves creating two openings. These are small in area and focussed on two walls of low sensitivity, the extent of which is illustrated on drawing ref: 3384-CWC-XX-00-DR-N-4001 (S5 and S6) and at **Figure 4.6**.

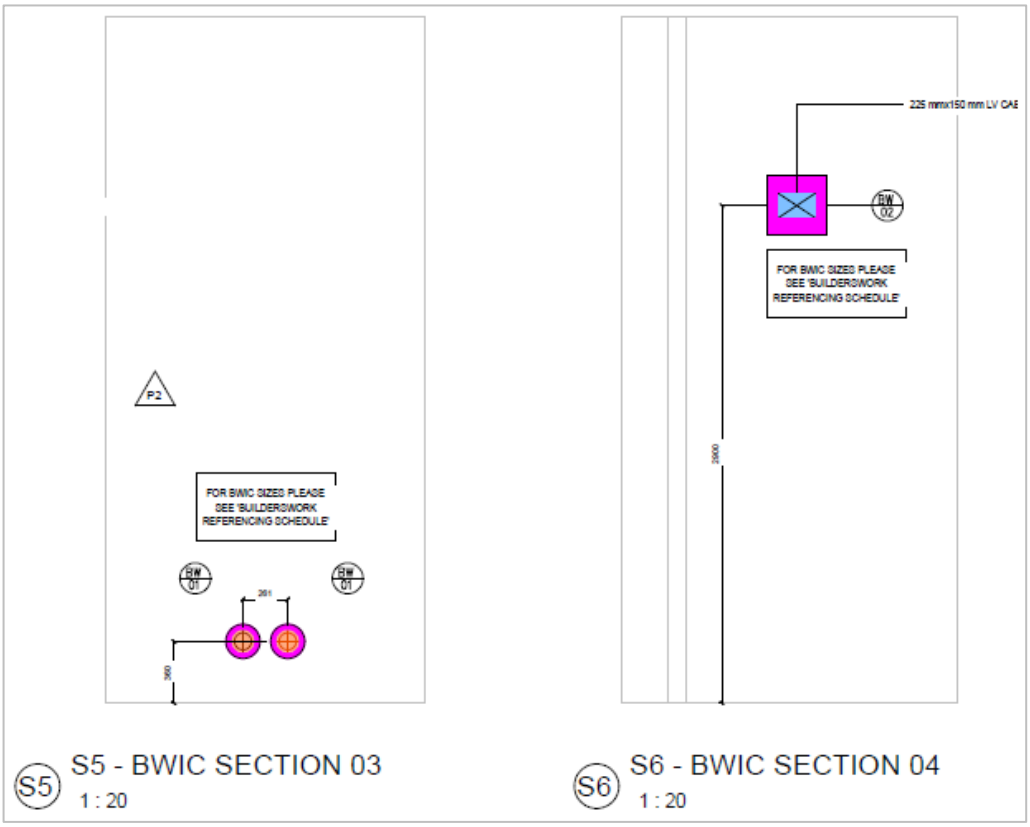


Figure 4.5: Proposed openings for associated pipework and cable trays

Additional Associated Works

4.32 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.[21]

Summary

4.33 The Proposed Works are confined to the rear functional areas and roof of the Crematorium, and, with the exception of the role played by the principal flat roof, do not contain any features of architectural or historic interest. Effects on original fabric

[21] Historic England (2014) Blackley Crematorium Official List Entry

are limited in number and size and only occur where pipework or cable trays enter the building, and where associated infrastructure is fixed to exterior walls. Visibility of the Proposed Works has been minimised or avoided where possible to ensure that visibility of the Proposed Works in key designed views south west 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.

4.34 The solar PV may be visible rising above the parapet of the Central and East Chapels and a degree of harm has been identified in relation to these works.

4.35 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

4.36 MCC, in determining the submitted full planning application and application, 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.[22] 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.

4.37 The Proposed Works to decarbonise Blackley Crematorium have been carefully considered and have also been informed by pre-application discussions with MCC planning and conservation officers. The Proposed Works have been designed to reduce and minimise any potential harm to the listed building. It is proposed that the ASHP is located in areas of least significance and any alteration of original fabric has been kept to a minimum. Any elements of the Proposed Works that would be visible have been designed to minimise harm to the listed building.

4.38 For the reasons set out above, it is considered that the PV aspect of the Proposed Works would cause a degree of harm to the significance of Blackley Crematorium. This is considered to be 'less than substantial' and low 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."[23]

4.39 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.

[22] Sections 16(2) and 66(1)
[23] MHCLG (2024) National Planning Policy Framework (NPPF), Paragraph 215

4.40 As identified above, a low level of less than substantial harm has been identified in relation to the significance of 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.

4.41 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 Crematorium 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 Manchester City Council ('the Applicant') in support of a full planning application and application for listed building consent (LBC) for alterations ('the Proposed Works') to the Grade II Listed Blackley Crematorium ('the Site').

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 Crematorium, 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.[24] 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 to decarbonise Blackley Crematorium have been carefully considered and have also been informed by pre-application discussions with MCC planning and conservation officers. The Proposed Works have been designed to reduce and minimise any potential harm to the listed building. It is proposed that the ASHP is located in areas of least significance and any alteration of original fabric has been kept to a minimum. Any elements of the Proposed Works that would be visible have been designed to minimise harm to the listed building.

5.5 For the reasons set out above, it is considered that the PV aspect of the Proposed Works would cause a degree of harm to the significance of Blackley Crematorium. This is considered to be 'less than substantial' and low within that 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 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 low level of less than substantial harm has been identified in relation to the significance of Blackley Crematorium. This partially conflicts with PfE Policy JP-P2, the objective of Core Strategy Policy EN3 and UDP Policy DC19 which seek

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

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 Crematorium 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 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 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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