

Statement of Common Ground

Darlington Local Plan (2016-2036) Examination in Public

Historic Environment

As agreed between:

Darlington Borough Council

&

Historic England

March 2021 (Updated April 2021)

Introduction

This Statement of Common Ground (SoCG) is prepared and agreed jointly by Darlington Borough Council (“the Council”) and Historic England in respect of the Historic Environment elements and references within the Submission Darlington Local Plan (2016-2036) currently subject to examination in public. This is an updated version of the Statement as it has been identified that the description of the proposed main modification to the Site 403 – Blackwell Grange East Housing Allocation Statement in the original version was not the same as that in the published schedule of main modifications (DBC2). This has been rectified in this version of the Statement of Common Ground which also includes an update to Historic England’s response on the Site 403 – Blackwell Grange East Housing Allocation Statement relating to the correct proposed main modification that has been suggested by the Council.

Background

Both parties have maintained regular contact and cooperated throughout the preparation of the Darlington Local Plan (2016-2036) from its earliest stages with various meetings held to discuss different aspects of the Plan such as the preparation and refinement of policy content and the undertaking and outcomes of heritage impact assessments in relation to proposed site allocations.

Purpose

The purpose of the Statement of Common Ground is to assist the examination in public process by setting out an update of each parties agreed respective positions regarding the proposed policies relating to the Historic Environment.

This is following Historic England’s representations to the regulation 19 consultation held in summer 2020 whom, whilst supporting the vision, aims and objectives from a historic environment perspective, raised a number of soundness issues with other detailed policies. It also follows a number of main modifications drafted by the Council subsequent to these comments and the preliminary questions raised by the Planning Inspector.

Areas of Common Ground

This section sets out each parties respective positions on the policies that Historic England commented on and raised soundness issues through the regulation 19 stage consultation or where a main modification is now proposed to address comments by others including the Inspector through his preliminary questions.

Policy ENV1 – Protecting, Enhancing and Promoting Darlington’s Historic Environment

Historic England stated at the regulation 19 stage that they had been working with the Council to amend the draft policy since 2018 and they were generally content with the wording of the policy ENV1 as proposed which reflected the informal dialogue.

However, they noted that the brackets in the first sentence are misplaced and need amending to take account of footnote 63 of the NPPF “non-designated archaeological heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.” As how the policy was worded appeared to consider such assets as designated heritage assets, whereas this is not the case.

The Council acknowledged this representation and has proposed to amend this wording as part of a wider main modification of Policy ENV1 to ensure it is consistent with the NPPF. The broader main modifications set out below have been suggested by the Council to ensure the policy was consistent with national planning policy following comments made by the Inspector in his preliminary questions.

Policy ENV1 – Para 1 – Proposed Main Modification

When considering proposals affecting a ~~all~~ designated heritage assets (Listed Buildings, Historic Parks and Gardens, Scheduled Monuments ~~or an archaeological sites of national importance~~), ~~or non-designated heritage assets of archaeological interest, demonstrably of equivalent significance to scheduled monuments~~, great weight will be given to the assets conservation. Proposals should conserve those elements which contribute to ~~its~~ such assets significance, including any contribution made by ~~its~~ their setting, in a manner appropriate to their significance irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm.

Proposals resulting in less than substantial harm to such ~~elements~~ designated heritage assets will be permitted only where this harm is clearly justified and outweighed by the public benefits of the proposal.

Proposals resulting in substantial harm ~~to~~ or total loss ~~to~~ of the significance of a designated heritage asset (or an archaeological site of national importance) will only be permitted ~~only in exceptional circumstances~~ where this is necessary to achieve substantial public benefits that outweigh the harm or loss, or, all of the following apply:

- the nature of the heritage assets prevents all reasonable uses of the site;
- no viable use of the heritage itself can be found in the medium term through appropriate marketing that will enable its conservation;
- conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and;
- the harm or loss is outweighed by the benefit of bringing the site back in to use

Policy ENV1 – Part D – Proposed Main Modification

Proposals which would remove, harm or undermine the significance of a non-designated heritage asset will only be permitted where the benefits are considered to outweigh the harm

~~to the character of the local area. Proposals must protect and enhance the~~ should seek to avoid harm to those features, including setting, which contribute to the significance of a non-designated heritage asset, including its setting, through measures such as good design.

~~Applications involving the demolition of a non-designated heritage building or structure must demonstrate that there is no sustainable use of the building.~~

Policy ENV1 – Part F – Proposed Main Modification

If the existing or original use of a heritage asset is no longer viable development proposals will be required to secure the optimum viable alternative use consistent with its conservation.

Historic England agrees with this suggested main modification to ensure the policy is effective.

Policy H4 – Housing Mix

Historic England commented at the regulation 19 stage that in identifying a suitable housing mix they support the consideration of location, physical constraint and context but also considers that character is an important factor which should be included as in some locations for example where there is a tight grain of historic development it may be suitable to provide a higher density of development.

The Council agrees and has suggested the main modification for effectiveness in this regard.

Policy H4 – Paragraph 1 – Proposed Main Modification

Proposals for housing development will be ~~expected~~ encouraged to provide an appropriate mix of housing types, sizes and tenures which meet local needs as identified within the most up to date Strategic Housing Market Assessment or by other evidence in the support of a planning application.

Historic England agrees with this suggested main modification to ensure the policy is effective.

Policy H10 – Skerningham Strategic Allocation

At the regulation 19 stage Historic England made representations that they support the requirement within Policy H10 for the design and layout to conserve and enhance the designated heritage assets on and adjacent to the site. However, they set out as identified within the Heritage Impact Assessment for this site alongside paragraphs 6.10.13-6.10.15 there are non-designated heritage assets on and adjacent to the site including archaeology which may be impacted development

proposals. Historic England would therefore advise that the policy also seeks to conserve and enhance non-designated heritage assets.

They also stated that to provide clarity within the policy, their preference would be for the main headline outcomes of the HIA to be included within the policy rather than these only being in the reasoned justification. However, as a minimum the policy should provide for a requirement for proposals to be carried out in accordance with the Heritage Impact Assessment, ensuring that the recommendations to minimise and avoid harm and opportunities for enhancement are carried through to future development proposals.

The Council considered these representations and has in response suggested the following main modification to Policy H10 to ensure the policy is effective and consistent with national policy. The Council considers it sufficient and effective to broadly refer to the HIA recommendations in the policy text and specifically set them out in further detail, as already done, in the supporting justification to ensure the policy remains concise.

Policy H10 – Last Policy Paragraph – Proposed Main Modification

The site, design and layout will be required to conserve and enhance the designated heritage assets on and adjacent to the site, together with their settings, in accordance with Policy ENV1. Proposals will be required to conserve, and where appropriate enhance designated and non-designated heritage assets within and in the vicinity of the site including their setting in accordance with policy ENV1. The design and layout should be carried out in accordance with the recommendations of the Darlington Local Plan Heritage Impact Assessment (2019) to avoid and minimise harm and provide opportunities for enhancement where appropriate.

Historic England have considered the suggested main modification and is in agreement with the proposed revisions.

Policy H11 – Greater Faverdale Strategic Site Allocation

At the regulation 19 stage Historic England made representations that whilst they support the inclusion within the policy of the requirement to conserve and enhance the historic Stockton & Darlington Railway, there is no protection within the policy of other relevant designated and non-designated heritage assets which may be impacted upon through development of the site. As set out under paragraph 6.11.9 the Heritage Impact Assessment for this site identified a number of important measures to avoid and minimise harm and provide enhancement. They therefore stated that the policy should be amended to reflect the need to conserve and enhance those designated heritage assets on and adjacent to the site, together with their settings.

They also stated to provide clarity within the policy, their preference would be for the main headline outcomes of the HIA to be included within the policy rather than these only being in the reasoned justification. However, as a minimum the policy should provide for a requirement for proposals to be carried out in accordance with the Heritage Impact Assessment, ensuring that the recommendations to minimise and

avoid harm and opportunities for enhancement are carried through to future development proposals.

The Council considered these representations and in response has suggested the following main modification to Policy H11 to ensure the policy is effective and consistent with national policy. The Council considers it sufficient and effective to broadly refer to the HIA recommendations in the policy text and specifically set them out in further detail, as already done, in the supporting justification to ensure the policy remains concise.

Policy H11 – Last Policy Paragraph – Proposed Main Modification

~~'The site design and layout must conserve and enhance the historic Stockton & Darlington Railway in accordance with Policies ENV 1 and ENV 2' to~~

The site design and layout will be required to conserve, and where appropriate enhance designated and non-designated heritage assets, within and in the vicinity of the site including their setting in accordance with policies ENV1 and ENV 2 and the recommendations of the Darlington Local Plan Heritage Impact Assessment (2019)

Historic England have considered the suggested main modification and is in agreement with the proposed revisions.

Policy E4 – Economic Development in the Open Countryside

Historic England made representations at the regulation 19 stage that policy E4 states that where it is possible and appropriate, proposals for the re-use of a heritage asset will be approved and set out that they do not consider this approach to accord with the NPPF which requires proposals to conserve and enhance heritage assets and their setting and sustain elements that contribute to significance.

Historic England also stated that they consider that there are adequate provisions in policy ENV1 to provide protection of heritage assets including those which may be subject to economic development proposals within the open countryside. Therefore, would advise removal of this wording from the policy to ensure consistency with national policy.

The Council acknowledge that this part of the policy as drafted would not be consistent with national policy or ENV1 for that matter so a main modification is suggested as part of a wider main modification to Policy E4 to delete this part of the policy as set out below:

Policy E4 – Part A Paragraph 1 – Proposed Main Modification

~~Where possible and appropriate, existing buildings including designated or non-designated heritage assets shall be retained and re-used. Any necessary new buildings~~

Historic England agrees with this suggested main modification to ensure the policy is consistent with national policy.

Policy TC3 – Additional Site for Town Centre Uses

Historic England made representations at the regulation 19 stage stating that the Heritage Impact Assessment for the Commercial / Kendrew Street site sets out several recommendations which will help to manage change in a manner which conserves and enhances the historic environment within this area. The policy as worded currently does not fully reflect the outcomes of the findings and seeks only where possible to incorporate the existing historic fabric and retaining buildings that are of historic importance.

They also went on to state that whilst we understand that paragraph 8.1.16 reflects the outcomes of the Heritage Impact Assessment, to provide clarity within the policy it would be our preference for the policy to include in headline form the key recommendations of the HIA for this site. However, as a minimum the policy should set a requirement for this site to be developed in accordance with the outcomes in order that proposals avoid and minimise harm and maximise enhancement opportunities where appropriate.

The Council considered these representations and in response has suggested the following main modification to Policy TC3 to ensure the policy is effective and consistent with national policy. The Council considers it sufficient and effective to broadly refer to the HIA recommendations in the policy text and specifically set them out in further detail, as already done, in the supporting justification to ensure the policy remains concise.

Policy TC3 – Part A – Proposed Main Modification

Ensuring sensitive integration of new buildings with old, seeking where possible to incorporate the existing historic fabric and retaining buildings that are of historic importance and taking account of the key recommendations of the Darlington Local Plan Heritage Impact Assessment (2019).

Historic England have considered the suggested main modification and is in agreement with the proposed revisions.

Policy TC6 – Darlington – Town Centre Fringe

Historic England stated through their representations at the regulation 19 stage that whilst they support the intention of the policy under criteria point b. to conserve historic buildings within the area, there are other assets such as archaeology, conservation areas etc, which should also be conserved and enhanced. As an

overarching term it would be better to express the intention of conserving the historic environment of the town centre fringe.

The Council agrees that for greater clarity, effectiveness and consistency with national policy the policy should refer to the broader historic environment, so the following main modification has been suggested.

Policy TC6 – Part B – Proposed Main Modification

B. Conserve ~~historic buildings~~ and where appropriate enhance the historic environment in the area, with an emphasis on creating opportunities for the celebration of Darlington's heritage.

Historic England agrees with this suggested main modification to ensure the policy is effective and consistent with national policy.

Policy IN9 – Renewable Energy Infrastructure

Historic England stated in their representations at the regulation 19 stage that given the potential for development of wind turbines to have an impact on historic landscape character, they consider that criteria point v. of Policy IN9 would be more effective if it was worded to include the historic environment in order that it provides for a broader definition including historic landscape character, heritage assets and their settings.

The Council agrees that for greater clarity, effectiveness and consistency with national policy the policy should refer to the broader historic environment, so the following main modification has been suggested:

Policy IN9 – Part A v – Proposed Main Modification

the historic environment, including heritage assets and their settings

Historic England agrees with this suggested main modification to ensure the policy is effective and consistent with national policy.

Monitoring Framework

Historic England commented at the Regulation 19 stage that they support the inclusion of an indicator on the number of planning applications granted permission contrary to Historic England advice on the grounds of impact on locally, regionally or nationally designated sites, with a target of no applications being granted contrary to Historic England advice. However, there are other indicators which may prove more valuable in setting a positive strategy for the historic environment such as:

- reduction in the number of assets that are classified as heritage at risk;
- preparation of a local list;

- completion of conservation area action plans and management plans where one has not been produced and review others where necessary.

The Council agrees that these further indicators will be valuable in ensuring the Council can continue to provide a positive strategy for the historic environment as required by national policy so has suggested a main modification to include these indicators above in the monitoring framework.

Historic England agrees with this suggested main modification to ensure the policies implementation can be monitored effectively and it is consistent with national policy.

Site 412 – 12 to 18 Skinnergate

Historic England stated in their representations at the regulation 19 stage that 12 Skinnergate is a Grade II listed building. However, they were not aware of any Heritage Impact Assessment that has been carried out for this site. In order to demonstrate that the allocation of this area is not incompatible with the requirements of the NPPF, as part of the Evidence Base underpinning the Plan there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the significance of these Listed Buildings and what effect the loss of this site and its subsequent development might have upon their significance.

The Council acknowledged that a Heritage Impact Assessment had not been undertaken at the regulation 19 stage for this site. One has now been undertaken in consultation with Historic England and the Council's Conservation Officer as part of the preparation of evidence to support the submission of a planning application for this Council owned site. This concluded that the works, on balance are considered to preserve the architectural and historic significance of the Listed Buildings and both preserve and enhance the character and appearance of the Darlington Conservation Area. Whilst some less than substantial harm has been identified, this is on the lower end of the scale and is considered to be outweighed by the public benefits of the overall and individual elements of the scheme. It is considered that this proposal complies with both national and local policy.

The Council therefore considers that this assessment demonstrates that the allocation of this area is not incompatible with the requirements of national policy and the site continues to remain appropriate to be proposed for allocation.

There have been informal discussions between Historic England and the Council regarding this site. The site is located within the Town Centre Conservation area, contains a Grade II listed building (12 Skinnergate) and a non-designated heritage asset. The Council as part of its pre-application discussions with Historic England has prepared a Statement of Significance and a Heritage Impact Assessment (November 2020) which Historic England has had sight of. These discussions have been positive, and as a result we very much hope that the Council will bring forward a proposal for the site acceptable to all. However, they are ongoing, and therefore their eventual outcome is to a degree uncertain.

As such, whilst we support the policy wording and consider that a scheme may be able to be delivered which conserves and enhances the heritage assets of this site,

the evidence to date submitted as part of the local plan has not demonstrated that the allocation of this site can be achieved at the quantum of development proposed for allocation (15 dwellings). We will be happy to continue to work with the Council on this site, both as a development opportunity and a plan allocation.

Site 95 – Beech Crescent East, Heighington

Historic England stated within their representations at the regulation 19 stage that the site lies within Heighington Conservation Area and they were not aware of a Heritage Impact Assessment having been undertaken for this site as part of the evidence base for the Local Plan. In order to demonstrate that the allocation of this area is not incompatible with the requirements of the NPPF, as part of the Evidence Base underpinning the Plan there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the character or appearance of the Conservation Area and what effect the loss of this site and its subsequent development might have upon the designated area.

The Council acknowledged that a Heritage Impact Assessment had not been undertaken at the regulation 19 stage for this site, so the Council sought to undertake one which has been included within the submission documents (SD29). The recommendations of this were that it is considered that any potential development will have an impact to the Heighington Conservation Area and the setting of the Grade II Trafalgar House, however development could be achieved on the site, subject to the following being considered:

- Further Archaeological assessment of the site will be required
- It is considered that the south section of the site, running along Station/ Heighington Lane, which is recognised as being of high contribution should not be altered and should be preserved and enhanced.
- Any development of the site should be of low density, to ensure an appropriate layout.
- Any development should be of the highest quality and standard of design, taking example from the local area and vernacular. The use of natural stone will likely be essential for an acceptable facing material.
- Landscaping for the site should be to enhance the existing mature tree and hedgerows. The existing trees and hedgerows should be protected.
- Boundary treatments should ensure they are of natural finish, making use of hedges and natural planting.

The Council therefore considers that this assessment demonstrates that the allocation of this area is not incompatible with the requirements of national policy and the site continues to remain appropriate to be proposed for allocation. However, to ensure the allocations statement is effective and consistent with national policy regarding the historic environment a main modification has been suggested as set out below to state that development of the site should be carried out in accordance with the recommendations of the heritage impact assessment.

The impact on the Heighington conservation area and the grade II listed buildings to the south should be carefully considered in the development of this site. Any scheme would require appropriate design and layout to mitigate any harm to these heritage assets and should be undertaken in accordance with the recommendations of the Heritage Impact Assessment.

Historic England has carefully considered the Heritage Impact Assessment and its recommendations along with the suggested main modification and makes the following comments.

The loss of this undeveloped site from the Heighington Conservation Area will further erode the rural edge to this part of the village, the village being designated a conservation area. There will therefore be a degree of harm from new development at this allocation site.

However, much of the historic village scale has been lost as a result of through extensive additions, including the consented neighbouring site to the west. The presence of the A6072 bypass, has further reduced the open character of this area.

Therefore, should this site be allocated, it will be necessary to ensure any harm from new development can be minimised through the measures identified in the Heritage Impact Assessment for this site.

Site 356 – Ingenium Parc

Historic England stated in the representations at the regulation 19 stage that they support the allocation of site 356 – Ingenium Parc which lies to the south of Cummins Engine Factory a Grade II* listed asset, and security fence at Cummins engine factory also Grade II*. Alongside the recently designated Grade II park and garden (Landscape at Cummins Engine Factory, Darlington). The form and profile of the Engine Factory building within its open, simple landscape is an important contribution to its significance. The simplicity of the design and its horizontal form punctuated by the single tall chimney are enhanced and complemented by the openness of the landscape – both the surrounding designed landscape and the extensive lowland landscape of the Tees Lowlands.

They also stated it is therefore important that any design is restricted in height to protect this setting so as any new development does not protrude over the ridge line of the engine factory. There should also be consideration given to important sight-lines to the building. Although not designed with a formal 'vista' there are two principal points from where the building in its setting is best appreciated.

Historic England also raised concerns over the masterplan for Ingenium Parc as available on the Council's website. This is because they consider that it would likely result in three elements of harm as follows;

- The proposed buildings are not orientated on the same axis as the Cummins building and landscape. This would result in a discordant relationship between the existing and proposed.
- The proposed buildings are too close to the southern boundary of the designed landscape and are in too close proximity to the principal building,

resulting in a negative impact on the setting of the two heritage assets (they will no longer be appreciated in an open, lowland landscape).

- Without a limit on the height of any building behind the Cummins building, its form and profile would be lost and compromised, which could be further exacerbated should the building take a traditional pitched-roof form as hinted at on the masterplan drawing).

Historic England therefore requested that the Masterplan is reviewed in consultation with Historic England in order that it conserves and enhances the important designated assets of Cummins Engine Factory.

The Council has agreed to review the masterplan with Historic England in due course and work closely on any detailed proposals brought forward. However, in order to address the concerns raised by Historic England with the masterplan in the meantime and to ensure this site allocations statement is justified in relation to the Heritage Impact Assessment, effective and consistent with national policy two main modifications have been proposed which are set out below.

Site 356 Allocations Statement – Paragraph 1 and Part B – Proposed Main Modification

A masterplan for Ingenium Parc sets out potential design principles and requirements for the sites development.

Development should be appropriately scaled and designed and set back from the sites northern boundary to reflect the original designed landscape setting of the Cummins Engine Factory. Retain and enhance the existing landscaping.

Historic England welcomes the opportunity to work closely with the Council in the future on detailed proposals at Site 356 and is in agreement with the main modifications subject to the insertion of a commitment to review the masterplan taking account of our recommendations of how this site can be delivered whilst conserving and enhancing the heritage assets associated with Ingenium Parc.

Site 403 – Blackwell Grange East

Historic England stated in their representations at the Regulation 19 stage that site 403 forms the grounds of the Grade II* listed Blackwell Grange Hotel (and Grade II listed outbuildings) and they are not aware of a Heritage Impact Assessment having been undertaken for this site as part of the evidence base for the Local Plan. In order to demonstrate that the allocation of this area is not incompatible with the requirements of the NPPF, as part of the Evidence Base underpinning the Plan there needs to be an assessment of what contribution this currently-undeveloped area makes to those elements which contribute to the significance of this Listed Building and what effect the loss of this site and its subsequent development might have upon its significance.

The Council acknowledged that whilst a statement of significance had been produced for this area a Heritage Impact Assessment had not been undertaken at the regulation 19 stage for this site, so the Council sought to undertake one which has been included within the submission documents (SD29). The recommendations

of this were that it is considered that any potential development will have some impact to the setting and significance of Blackwell Grange. However, as indicated with consideration to the layout, design and landscaping potential harm by development can be sufficiently mitigated against as follows:

- It is considered that the site is of lesser significance, however does still form a part of the setting of Grade II* Blackwell Grange.
- The existing tree planting and landscaping should be preserved and enhanced. Additional landscaping will be required for buffering to the north of the site and can be used to form the line of Mill Lane.
- Reinstatement of Mill Lane is considered to have positive consideration and could benefit the understanding of the site.
- Any development will be required to be of the highest quality, ensuring it is low lying, creating and innovative in design.
- The use of standard housing plan form will not be considered acceptable.

The Council therefore considers that this assessment demonstrates that the allocation of this area is not incompatible with the requirements of national policy and the site continues to remain appropriate to be proposed for allocation. However, to ensure the allocations statement is effective and consistent with national policy regarding the historic environment a main modification has been suggested as set out below to state that development of the site should be carried out in accordance with the recommendations of the heritage impact assessment.

Site 403 Allocations Statement – New Bullet at Part C – Proposed Main Modification

Any development will be required to be of the highest quality, ensuring it is low lying, wooded in character and creative and innovative in design.

Historic England has carefully considered the Heritage Impact Assessment and its recommendations along with the suggested main modification and makes the following comment.

The Heritage Impact Assessment undertaken and development parameters suggested to reduce any harm and where possible enhance the parkland setting of Blackwell Grange are reasonable. This part of the modified parkland is the least sensitive to new development. Whilst there will be some slight harm to the setting of the Grade II* listed Blackwell Grange, any harm can be reduced by design, especially through landscaping to the former garden. We therefore do not object to this allocation subject to development being informed by the outcomes of the Heritage Impact Assessment.

In respect of proposed modifications to the policy, Historic England does not at present consider the proposed modification has translated all the design measures which will reduce any harm from new development, through to the policy. We therefore consider the following revisions are necessary:

Site 403 - Blackwell Grange East – Historic England Proposed Main Modification

The site is located to the south of the main urban area of the Borough and is an area of open space (disused golf course). The site is located to the east of Carmel Road South and to the west of Grange Road. It is part of the grounds of Blackwell Grange Hotel which is located to the north. The site is proposed for allocation for residential development with an indicative yield of 72 dwellings.

Issues and requirements

- a. The site forms part of the grounds to the Grade II* listed Blackwell Grange Hotel (and Grade II listed outbuildings). Development ~~will affect~~ should protect the setting of the Grade II* listed Blackwell Grange and its parkland curtilage. Proposals should be informed by the Heritage Impact Assessment (2020) prepared as part of the local plan. Significant mitigation and public benefit are required to offset the harm caused. Proposals should take opportunities to reinstate the former Mill Lane including a landscape buffer along its line. There is the potential to better reveal the approach to Blackwell Grange along the historic drive from Grange Road.
- b. A development scheme would need to restore the remaining parkland area to the Grade II* Listed Building.
- c. Any development will be required to be of the highest quality, ensuring it is low lying, wooded in character including the planting of a perimeter tree canopy, and creative and innovative in design.*
- e- d. The site is designated as a Local Wildlife site and any development should provide mitigation. Habitat improvements required on the parkland area to the north.
- e- e. There are a number of TPO trees/groups on the site. Some form a strong continuous tree belt along the boundaries with the highway. There are also a number of single TPO trees across the site. The trees should be retained and maintained.
- e- f. The site is within an area of high interest with regards to Great Crested Newts. An ecological survey will be required to support a planning application.

* *Council's proposed modification*

Glossary

Historic England stated at the regulation 19 consultation that whilst they support the inclusion of a definition of a non-designated heritage asset, they consider a slight amendment to this definition would be helpful to provide clarity on the differentiation with designated heritage assets. This could align precisely with the wording of the Planning Practice Guidance Paragraph 039 or seek to maintain similar wording to

that currently proposed with the addition of wording that whilst of local significance they do not meet the criteria for designate heritage assets.

The Council agrees that this definition does not align with that in national policy so a main modification is suggested to ensure this accords.

Glossary – Non-designated heritage assets – Proposed Main Modification

~~*Parts of the historic environment including buildings, structures, areas and archaeology that are considered by the Local Planning Authority to be locally significant. They are identified through strategic planning, development management and can include a Local List.*~~

Non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by the Local Planning Authority as having a degree of heritage significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets.

Historic England agrees with this suggested main modification to ensure consistency with national policy.


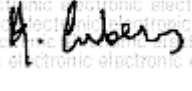
Appendix C – Darlington's Heritage Assets

Historic England stated in their regulation 19 representations that the recent inclusion of Landscape at Cummins Engine Factory, Darlington as a Grade II Park and Garden ID 1467759 should be included in appendix c.

They also recommend that the names of the assets align with the National Heritage List for England for the purposes of clarity.

The Council acknowledges that the Grade II Landscape at Cummins Engine Factory should be added to the list in appendix c as it was designated following the publication of the proposed submission Local Plan, so a main modification is proposed to add this to appendix c. The Council also proposes a minor modification to ensure the assets names align with those on the National Heritage List for England.

Historic England agrees with this suggested main and minor modifications.

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| The contents of this document are agreed as the position of common ground regarding the Darlington Local Plan (2016-2036) in relation to the Historic Environment | |
| Signed on behalf of Darlington Borough Council | Signed on behalf of Historic England |
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