

Comment

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| Address | [REDACTED] [REDACTED] [REDACTED] |
| Event Name | Darlington Local Plan 2016-2036 (Regulation 19) |
| Comment by | obo Blackwell Grange (Claire Hattam - 1250539) |
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Question 2

Do you consider that this part of the Local Plan is unsound because it is not: (tick all that apply)

Question 3a

Your Comments

Please give details of why you consider that this part of the Local Plan is not legally compliant or unsound or fails to comply with the Duty to Cooperate.

See attached response

Question 4

Changes Sought

Please Note your representation should cover succinctly all the information, evidence and supporting information necessary to support/justify the representation and the suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. There is the opportunity to attach Word or PDF files before submitting your comment.

After this stage, further submissions will only be at the request of the Inspector, based on the matters and issues identified for examination.

Please set out what change(s) to the Local Plan you consider necessary to make it legally compliant or sound. You will need to say why this change will make the Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording for any policy or text.

See attached response

Question 7

Please **upload any supporting documents** here. Please do not include any signatures or other personal data such as home addresses which you would not wish to see published on the Council's website.

[Blackwell Grange \(Site 009\) - DBC Local Plan Representation Appendices.pdf](#)

4 September 2020

David Nelson
Via email

Darlington Borough Local Plan 2016-2036: Proposed Key Changes to Policy H2 (Housing Land Allocations) at the Pre-Submission Stage (August 2020)

Planning House has been appointed by Blackwell Grange Hotel Ltd (hereafter 'the client') to submit a representation to the Submission Draft Darlington Borough Local Plan 2016-2036 (Regulation 19) statutory consultation. This representation relates to the potential housing Site 009 (Blackwell Grange East), which was identified in the draft Darlington Borough Local Plan published for consultation in June 2018. The client contends that the revision of Policy H2 (Housing Allocations), which proposes to remove Site 009 and replace it with Site 403¹ (**Appendix 1**), is not supported by the published evidence base.

The Council justifies this change in site allocation claiming that Site 403 '*will have less impact on heritage assets*' and that this decision was taken '*in response to representation that highlighted the relative sensitivity of Site 009*'. The decision details from the Special Cabinet Meeting on 11th February demonstrate that Members resolved to agree the recommend changes to the Local Plan².

The detail of this representation demonstrates, firstly, why the client believes the proposed key change to Policy H2 in the Darlington Local Plan in respect to Site 009 is unjustified and that its replacement Site 403 is not markedly-less environmentally sensitive to new residential development. The case for this is made utilising the to date published Local Plan evidence base and official consultation responses. Secondly, the client wishes to bring attention to the fact that an area of approximately 0.26 ha (former orchards of Blackwell Grange) within the previously proposed Site 009 (8.26 ha) is appropriate for development and would not compromise any opportunities to enhance the heritage significance of the Blackwell Grange parkland estate as well as restore the former parklands/ designated Local Wildlife Site (LWS).

This smaller site is identified as He2 within the Blackwell Grange Planning and Development Brief, which was developed and published for consultation in 2015³. **Appendix 2** is an extract of this development brief, which identifies the potential plots for residential development (He1-He3) within associated the Landscape and Restoration Plan. Discussions regarding the potential re-development of land delineated by He2 have therefore been on-going for many years between Darlington Borough Council (freeholder), the client (leaseholder) and other stakeholders. The client's current proposal is for a high-quality retirement village with an approximate development footprint of 0.17 ha illustrated by the indicative Sketch Site Plan (**Appendix 3**).

¹ [Special Cabinet Report - Submission Local Plan \(11 February 2020\)](#), Agenda item 4(d), paragraph 33.

² [Special Cabinet Report \(11 February 2020\) - Decision Details](#), resolution (a).

³ The outcome of the consultation on Blackwell Grange Planning and Development Brief was reported to the Place Scrutiny Committee on 12th September 2017, [item 3\(b\)](#). However, it never reached adoption.

Blackwell Grange Golf Club: Statement of Significance (2012)

Darlington Borough Council sought to explore options for development potential across the

Blackwell Grange parklands, which were formally used as a golf course. As the freeholder/landowner, the Council commissioned a study into the significance of Blackwell Grange (Grade II*) and its surrounding estate. It is noted that from the outset this report establishes that *'there is scope to consider some alternative future management of the parkland which will enhance that which is significant, benefit the hotel and its guests and offer opportunities for development'*. The statement divides the parkland into different zones of sensitivity and provides a summary for each. The client's site and the formally identified He2 is identified in the statement as Zone 2 (**Appendix 4**). The historic sensitivity of Zone 2 (the walled garden and former orchard) is summarised in the statement as follows:

*"This is a sensitive area which **could be brought back into active use for residential, small high-quality business use or additional accommodation for the hotel**. The red brick wall should be retained as should the Pleasure Walks, and gravel walks outside the walls. New buildings could reflect the form and overall style of a typical garden hot house, so be against the garden walls, probably a lean to roof design, and have a strong use of glass in their fabric.*

*The property divisions could also make use of the geometric layout of the early 19th century flower beds and gravel walks and be defined with gravel paths or low-lying planting. There were two other enclosures west of the walled garden. There is a **little more flexibility here for development**, but it still needs to be sensitive and of a low density, with trees and paths forming the structure. It could take the orchard as its inspiration and provide structured planting of fruit trees to create new avenues or landscaped features"⁴ [**emphasis added**].*

The statement (page 2) also highlights that there are *'opportunities for reuse [of] the walled garden and former orchards to the west'* and that there is scope to *'consider their reuse in a way that brings the walls into active maintenance and allows future readability'*.

By itemising the nature and extent of each individual heritage assets⁵ across the whole Blackwell Grange parkland site, the statement enables decision-makers to distinguish between what should be cherished and what should be changed as well as informing future management. **Appendix 5** presents extracts from the statement (Figure 19 and Table 2) which provides details of the location of heritage assets around Blackwell Grange as well as the type, level and extent of their significance. In reference to the site proposed by the client, the following is noted:

- Asset no. 53 – Orchard (present in 1790) – Some Architectural Significance – Enclosure remains, but now waste with no trees.
- Assets no. 59 – Hedgerow or tree-lined field boundary in 1790 – Considerable Architectural Significance – Enclosure.

Although not within the proposed site boundary, it is also noted that:

⁴ [Blackwell Grange Golf Club Statement of Significance \(2012\)](#), p. 4.

⁵ In accordance with Historic Environment Planning Practice Guidance 2010, paragraphs 12 & 55.

- Asset no. 39 – Walled garden proposed in 1802, now a car park. Site of hot houses visible. A gym has been built in NE corner; boot scraper outside north gate – Some Archaeological Significance – Below ground information relating to former planting schemes and vertical archaeology relating to hot house construction.

This is because it demonstrates that there has been redevelopment of land in the grounds and setting of Blackwell Grange in recent years and this has been possible despite the heritage significance of the former walled garden.

Even though it is acknowledged that the statement raises the question whether the parkland could merit designation, it also concludes:

“The special interest of the parkland is therefore in the survival of historic documents which have allowed the pre-1790 planting regime to be identified amongst the subsequent 1802 planting regime. These historic maps of 1790 and 1802 are of considerable historic significance...the **golf course has diminished significance**, but much is reversible...the **key to the retention and enhancement of significance is through improved vegetation control and a planting regime** that recognises the significance of this park”⁶ [*emphasis added*].

New development on the site proposed by the client would therefore not restrict the Council’s ability to improve or enhance the significance of the Blackwell Grange parkland estate in the future.

It is therefore clear that the primary evidence base explicitly confirm there are opportunities to bring the client’s site back into active use despite the presence of some historic sensitivities. Consequently, it is argued that a scale of new development akin to that proposed in **Appendix 3** could be accommodated on the client’s site, and through discussions with the Conservation Team at Darlington Borough Council, there would be scope to ensure a sensitive and responsive scheme is delivered.

Strategic Housing Land Availability Assessment (SHLAA) – Update 6 (September 2015)

The most recent version of the Darlington Borough’s SHLAA was published in September 2015, and within this report and its appendices there is evidence to support the argument presented in this representation.

At paragraph 5.4 of the Final SHLAA Report⁷, it is recognised that work is well advanced to establish the suitability of some other sites, notably Site 119 (Blackwell Grange East), part of the former Blackwell Grange Golf Course. **Appendix 6** delineates Site 119 and demonstrates even in 2015 it is identified by the Council as a ‘previously assessed site’. The report also confirms here that if no constraints are identified that which mean the site is not suitable for development, then it will be allocated with the potential to deliver over 160 new homes.

Appendix 7 of the final report and this representation provides details of the SHLAA assessment outcomes relating to potential housing site in terms of the suitability, availability, achievability and constraints. In reference to site 119 (Blackwell Grange East) analysis

⁶ [Blackwell Grange Golf Club Statement of Significance \(2012\)](#), p. 74.

⁷ [Darlington Borough SHLAA Update 6 - Final Report](#), p. 9.

confirms it is suitable, available and achievable. The comments in Appendix 6 also note that the site was identified in the withdrawn Making and Growing Places DPD (Preferred Options). This further demonstrates the Council has considered the site (the proposed allocation Site 009) as not only appropriate for development for many years prior to the publication of the emerging Local Plan, but also deliverable with it being on the Council's land disposal list.

In terms of identified constraints, the commentary only states any development must be of the highest quality to not significantly adversely affect the setting of the Listed Building, Blackwell Grange. Appendix 8 of the Final SHLAA Report, which details the constraints on the deliverability and developability of potential housing sites, supports this by notably excluding Site 119/ Blackwell Grange East (see **Appendix 8**). This further demonstrates that the Council considered the site did not have any constraints on it that would make it unsuitable for development: i.e. no 'show stoppers' or capacity constraints.

Draft Sustainability Appraisal (SA) Report for Emerging Local Plan (June 2018)

In terms of assessment process, it is noted that the Draft SA Report⁸ confirms Darlington's Housing and Employment Land Availability Assessment (HELAA) published in March 2018 determined the suitability, availability and achievability of potential development sites across the borough; and took into account all sites considered at the previous SHLAA and Employment Land Review stages as well as any 'new' sites submitted as part of the 'call for sites' process.

The SA Report also confirms in paragraph 8.4 that all sites identified in the HELAA were deemed suitable, and therefore subject to SA-specific assessment unless they had already secured planning permission (i.e. the principle of development has been established through the planning application process). This process and the rationale for assessment of potential housing sites in the SA is not disputed by the client. However, it is not apparent what evidence justifies the SA conclusion that the development of Site 119 would have *significant negative impacts* on the historic environment when the SA assessment in Appendix G of the draft SA Report concludes in broad terms only; that development will affect the setting of a Grade II listed building and its parkland curtilage (see **Appendix 9**). It is acknowledged that there is the possibility for new development to have 'significant negative impacts' on the historic environment (depending on scale, density, materials, etc) because of the sensitivities across the wider site at Blackwell Grange. However, the SA is very light-touch and does not respond to the evidence (i.e. the Statement of Significance and the advanced draft but unadopted Blackwell Grange Planning and Development Brief); both of which confirm various parcels of land within the wider site could be developed. The SA is therefore inadequate and does not provide sufficient detail to inform decision-making on specific housing allocations or their development potential.

It is recognised that, as stated in the Draft SA Report⁹, the purpose of SA is not to make a recommendation on which potential development site should be allocated in an emerging plan. However, the conclusions of site-specific assessments within both the SHLAA and SA provide neither the narrative on the decision to remove this site from the list of potential development sites within the Darlington Borough Local Plan 2016-2036 nor the evidence of how such a decision was made.

⁸ [Draft Sustainability Appraisal Report \(June 2018\)](#), paragraph 7.6, p. 23.

⁹ *Ibid*, paragraph 8.8, p. 30.

Draft Blackwell Grange Planning and Development Brief (2015-2017)

Given the nature of the document, this brief went into significant detail regarding the best options for new development across the whole former golf course site at Blackwell Grange. In terms of layout and density, it identified that there are three distinct character areas within the proposed site that can support various types of development. Specifically in relation to He2 (i.e. the client's site), it was considered that:

"[there was] the opportunity for more connected forms [of development] that might include high-quality house, mews cottages or apartments recognising the relative seclusion of the site [given that it is to the rear of the hotel] and the need to accommodate landscape and parking that is complementary to the character of the listed building and existing landscape features".¹⁰

It is also important to note that the purpose of this development brief was to guide proposed development of housing across the site (He1, He1a, He2 and He3) and help facilitate the restoration of the parkland landscape as a whole. This is another example of evidence prepared by Darlington Borough Council that supports the principle of development at the client's site and the ability for such development to help better reveal the heritage values of Blackwell Grange and its setting.

Draft Blackwell Grange Planning and Development Brief: Consultation Comments and Official Response¹¹

Appendix 10 presents the consultation comments received against the development brief document and the official officer response to them, specifically in relation to development site He2. The two main concerns arising from the consultation responses were potential highways and heritage impacts.

It is noted that Highways England raised concerns relating to any residential development across the whole site proposed and its impact on the surrounding network. On this basis, any development on any part of the former golf course at Blackwell Grange would need to be supported by a robust highways impact assessment. In response to this the Council confirmed that a Transport Assessment was being undertaken and being produced in consultation with Highways England, which the aim to inform the density of development across the site.

The Council's position on highways is supported by the client and recognises that any planning application for site He2 would be supported by a highways impact assessment. It can therefore be concluded that in terms of highways impact avoidance and mitigation measures are possible for the site He2 to ensure there is no severe impact on the road network.

In response to the objections on development plot He2 in terms of potential impacts on the historic environment and its setting, the Council provided the following notable responses:

"The site is part of the setting of the Grade II Listed Building, however, this **does not mean that no change or even no harmful change can take place...**[the] Framework allows for less than substantial harm, providing there are public benefits... **We have received advice from Historic England that the allocation***

¹⁰ [Blackwell Grange Planning and Development Brief \(Draft 2017\)](#), para 48, p. 15.

¹¹ Although the initial consultation on the development brief was carried out in 2015, the outcome of the consultation process was reported to the Place Scrutiny Committee on the 12 September 2017.

of the site for relatively low density, top-end executive housing would constitute less than substantial harm...

There is a balance between the amount of development and the continued attractiveness of the parkland setting. However, the proposed development will be high quality, high specification, in a very attractive parkland setting, in a desirable residential suburb...The impact on the setting of the Listed Building is an important consideration and any scheme will be agreed with Historic England. The design and massing of the apartments would be agreed with Historic England...The parkland does not meet Historic England's criteria to be registered as an Historic Park and Garden as a result of the changes that have taken place on the site over the years. There are plans to enhance the former parkland and create a local nature reserve, funded by development on the site...

Historic England advice gave us a steer that the site has some more development potential than the Archaeo-Environment Report of 2012 advises...The proposed development has no impact on the boundary walls...At two and a half storeys, roughly the height of the existing houses on Blackwell Lane, the proposed apartments would be below the height of the tree belt along Blackwell Lane. [***emphasis added***].

The Council's comments above support the published evidence and emphasise that part of the proposed allocation Site 009 in the emerging Darlington Local Plan (i.e. development plot He2) is suitable for development. In fact, the Council takes this further by stating explicitly there are opportunities for even greater development on this site than previously considered and that this standpoint is supported by English Heritage. Importantly, it is made clear English Heritage consider development on He2, if it is a relatively low density and high-quality scheme, would constitute 'less than substantial harm' in accordance with the Framework (2019, para 193). The Council's response also confirms the position that the restoration and enhancement of the former parklands is an important factor when considering new development on the Blackwell Grange site as a whole because such development is likely to help fund, at least in part, this work. As noted above, the Statement of Significance recognised a new vegetation control and planting regime as key to retaining and enhance the heritage significance of Blackwell Grange and its setting. Therefore, new development on He2 also has the potential to make a positive contribution to the historic environment and its setting.

Draft Darlington Local Plan 2016-2036: Housing Site Allocation Process, Consultation Comments and Official Response (June 2018 Consultation Draft)

The supporting text of Policy H2 (Housing Allocations) of the draft Darlington Local Plan, which was last published for public consultation during the summer of 2018, explains how allocations were selected taking into account sustainability principles and a number of different criteria (e.g. prioritising developing to the urban area, those sites with good access to public transport, including brownfield sites were possible, avoiding areas which have significant physical constraints and avoiding environmentally sensitive locations)¹². It is contended that this methodology for site selection is flawed and does not take account of the evidence produced by Darlington Borough Council or English Heritage if it has been used to exclude development plot He2/ the client's site from potential allocation. Even though the Council has now published the assessment of the new proposed allocation (Site 403), the client considers that the

¹² [Draft Darlington Local Plan 2016-2036 \(June 2018\)](#), paragraph 6.2.15, p. 36.

Council's reasoning for replacing Site 009 with this site is unjustified and unsupported by the evidence base. It is therefore argued that, based on the Council's own criteria, further scrutiny should be given to this smaller plot within the previously proposed Site 009, and subject to the same assessment process.

It is also noted that Appendix B of the draft Report provides 'statements' for each proposed allocation, outlining site specific requirements, constraints and relevant information. **Appendix 11** of this representation present the statement for Site 009 (Blackwell Grange East) as proposed at this stage. Despite the requirement for 'significant mitigation and public benefit measures to off-set the harm caused' for Site 009, the supporting statement only identifies that the development 'will affect the setting of the Grade II listed Blackwell Grange and its parkland curtilage' and identifies it for allocation with an indicative yield of 43 dwellings. Therefore, despite the potential for substantial harm to designated heritage assets and their settings, the Council proposed Site 009 (as delineated in **Appendix 1** of this representation) for allocation because it considered this site was in accordance with paragraph 198 of the Framework (2019 version), which allows for some harm to the historic environment providing there is enhancement or public benefits to offset any harm – e.g. the restoration and enhancement of the parkland which is open to the public.

However, English Heritage's comments on the draft Local Plan in June 2018 are clear and concluded that it was *'unable to support the proposed housing site allocations contained within Policy H2'* (see **Appendix 12**). To summarise, its representation stated:

"The SA does not provide any evidence to determine whether the sites can accommodate the quantum of development without harm to the historic environment. Some parts of the SA suggest mitigation measures without any evidence to support their inclusion...The Plan and the supporting evidence base including the SA should be amended to ensure that it includes a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites for development and to ensure that there are appropriate site specific mitigation measures which will minimise harm to the historic environment".

Even though it is acknowledge that the wording of Policy H2 (Housing Allocations) seeks to ensure the listed building, trees and parkland are protected on Site 009, the client supports this valid point from Historic England. The client agrees that a more detailed site-specific heritage impact assessment is needed to inform the decision-making process. The client considers such assessment would not only identify that the principle of development is acceptable on He2, distinct from the wider extent of Site 009, but also support the Statement of Significance and previous comments from Historic England.

Appendix 13, again prepared by Darlington Borough Council, presents a map of significant features across Blackwell Grange. From this it is clear that there are no features of heritage significance on the former orchards located to the rear of the Listed Building (He2/ the client's site). By comparison, the newly proposed Site 403 would impact on the following features:

- No. 63 – Tree grouping of sycamore and lime on 1st Edition Map 1860 and extant – Architectural feature – Considerable Significance
- No. 64 – Isolated tree plus two younger limes - Architectural feature – Considerable Significance
- No. 31 – Stone building used as animal shed with typical sloping floors for draining along bays facing length of wall – Architectural Feature – Some Significance
- No. 68 – Ridge and Furrow – Archaeological – Some Significance

Appendix 14 also demonstrates that officers recognise *"developing nearer Grange Road [i.e. Site 403] is more sensitive from a Listed Building perspective...In terms of impact on the former parkland, the Blackwell Lane side of the site [i.e. He2/ the client's site] has already seen housing development in the form of Grangeside and The Spinney"*.

On this basis, along with the other evidence produced primarily by Darlington Borough Council, the justification for removing Site 009 and replacing it with Site 403 is questioned.

This key change of Policy H2 is considered unjustified because to date there is no evidence to demonstrate or support that Site 403 would have less impact on heritage assets than Site 009. In fact, the published evidence to date supports the client's case that development plot He2/ the former orchards of Blackwell Grange has the potential to have less substantial harm on the significance of the historic environment than Site 403.

Biodiversity Impacts and Local/ National Planning Policy Compliance

The focus of this representation is on heritage matters as these are the reasons cited by the Council for removing Site 009 from the emerging Local Plan's list of housing allocations. The client nevertheless notes that likely ecological issues (e.g. destruction/ loss of designated habitat and disturbance to protected species) of developing the full extent of Site 009 are comparable to those identified for Site 403; if not potentially less severe. As such, the likely adverse impacts on biodiversity also provides support to the client's case for allocating the former orchard/ site He2.

In the Local Plan's Policies Proposals Map published in June 2018, it can be seen that Site 009 in-part comprises of a Local Wildlife Site (LWS) (see **Appendix 15**). The supporting Housing Statement in Appendix B of the draft Plan corroborates this by stating (see **Appendix 11**):

"c. The southern half of the site [Site 009] is designated as a Local Wildlife site and any development should provide mitigation. Habitat improvements required throughout the site and on the parkland area to the south of former Mill Lane."

The draft SA report provides further detail by stating that 49% of Site 009 comprises of land designated as LWS (see **Appendix 9**). Despite including such a percentage of designated land, plan policy only requires 'any development to provide mitigation'. Habitat improvements have the potential to mitigate adverse impacts on protected habitats and species, however, it is doubtful that such measures would be effective given the extent of designated area and the fact that restoration proposals for the wider parkland are to include increased public access. Given that 95% of the new allocation Site 403 is designated as LWS (**Appendix 16**), the adverse impacts on biodiversity are likely to be more significant. Once more the supporting housing statement (see **Appendix 17**) states simply that: *"c. 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"*.

If nearly the full extent of Site 403 is designated LWS, it is debateable whether it is possible to mitigate or for habitat improvements to compensate for the likely adverse impacts on protected habitats and species. Even at this advanced stage of the plan-making process and regardless of the ecological constraints on the site, there is insufficient published evidence to justify the allocation of Site 403 and demonstrate how a potential yield of 72 dwellings could be achieved. Moreover, it is considered that Site 403 is non-compliant with emerging Local Plan policy and the Framework.

Firstly, strategic policy ENV7 (Biodiversity and Geodiversity and Development) of the Local Plan (June 2018) states that *"development will be refused if significant adverse effects to biodiversity...cannot in the first instance be avoided, mitigated or compensated for as a last resort"*. The client contends that the proposed allocation of Site 403 does not avoid potential significant adverse effects on biodiversity and in fact actively encourages it by directing development to a site which is nearly entirely designated for ecological protection. As explored below, the client considers the conclusion of the SA that development of Site 403 would only have some adverse impacts on biodiversity is unsubstantiated. Given that the Submission draft version of policy ENV7 (August 2020) maintains the policy position, this argument remains valid.

Even though ENV7 has been updated to reflect the requirements of the Framework in terms of development *"providing net-gains for biodiversity"* (2019, paragraph 170) as opposed to 'no net-loss' as a minimum (Local Plan, June 2018), it is therefore secondly questioned if development of Site 403 can meet this policy requirement. Arguably off-site mitigation and compensatory measures could be implemented across the wider parkland to the north of Site 403, however, in such situations it is important to ensure new habitat provision and improvements are appropriate to the site context. The latest draft of EN7 also includes:

"Development likely to have an adverse effect on any of the Borough's Local Nature Reserves or Local Wildlife Sites will only be permitted if it can be shown that the reasons for the development, or benefits to the local community from the development, outweigh the interest or value of the site and any harm can be overcome by mitigation or compensation measures".

The client does not consider the Council has demonstrated the above with its allocation of Site 403. The client's site (former orchards/ He2) is also covered by the same LWS designation (**Appendix 15**), yet the extent of development proposed on this smaller site (approximate development footprint of 0.17 ha) and the fact that its biodiversity value is likely to be lower compared to Site 403 (i.e. no impact on TPOS and Great-Crested Newts) means development on this site would not only more effectively minimise potential adverse impacts on biodiversity in the first instance, but also require less interventions to adequately mitigate it and achieve net-gains overall.

Final Sustainability Appraisal (SA) Report for Submission Draft Local Plan (August 2020)

One of the main reasons why the client considers the site-specific SAs are weak and simplistic is that, despite the higher percentage of designated LWS on Site 403 (95% LWS) compared to Site 009 (49% LWS), the SA in both instances identifies almost identical biodiversity impacts. As illustrated in **Appendix 9 and 16**, both site-specific SAs conclude development is predicted to have long-term adverse impacts on biodiversity and these are likely because *"the site forms part of the Blackwell Grange Golf Course Local Wildlife Site...contains numerous TPO trees/ groups...the site is within an area of high interest with regards to Great Crested Newts"*. With little discernible difference in the analysis or conclusions from the SA, it is questioned how the SA has and can inform the Council's decision-making in the site allocations process with any accuracy. The Final SA Report states *"it is not the purpose of SA to make recommendations on which potential development sites should be allocated"* (paragraph 8.9). The SA must not be the only element which determines site allocations because there are a range of important planning factors to consider, however, it is vital the SA is integrated into the site allocation process and makes robust recommendations on the overall sustainability of

sites. It is therefore considered by the client that the SA of the Darlington Borough Local Plan provides insufficient detail to justify the housing allocations as presented.

Appendices 9 and 16 provide further evidence that the SA is weak and does not provide sufficient detail to inform decision-making. In terms of impacts on the historic environment, the site-specific SA for Site 009 and Site 403 are almost identical. Once more this raises doubt over the depth of scrutiny applied in the SA process. Against SA objective 16 (Conserve and enhance Darlington's distinctive and valuable historic environment) the site-specific SA for both sites states:

"The site forms part of the grounds to the Grade II listed Blackwell Grange Hotel (and Grade II listed outbuildings). Development will affect setting of the Grade II listed Blackwell Grange and its parkland curtilage. Significant mitigation and public benefit required to offset the harm caused."*

The potential for significant adverse impacts on heritage are identified for both allocations yet the SA conclusions simply state overall, *"development will affect setting of the Grade II listed Blackwell Grange and its parkland curtilage"*. The proposed mitigation measures to address these significant adverse impacts for both sites are not only identical, but also lack specific detail – i.e. *"Would need significant mitigation to restore the remaining parkland area to the Grade II Listed building"*. The latest published SA and its conclusions provide further support to Historic England's comments during the previous consultation that more detailed site-specific heritage impact assessment is needed to inform the site allocation process (see **Appendix 12**). Importantly the SA also notes Site 009 has the *"potential to better reveal the approach to Blackwell Grange along the historic drive from Grange Road"*; whereas Site 403 is *"within an area of high archaeological potential"*. Hence, even if the Council deems the supporting SA robust, the fact that their own evidence predicts the development of Site 009 would cause less harm to the historic environment than Site 403 undermines its reasoning for removing the proposed site allocation on heritage grounds (**Appendix 1**).

Conclusion

It is the client's position that the removal of Site 009 as a whole is unjustified and not supported by the Council's own published evidence base.

The current proposal for the former orchards (site He2/ the client's site) is to erect a high-quality low density care facility/ retirement village (C2 use) is considered to be an appropriate development use for this site and could assist with enabling Blackwell Grange (Grade II*) to be retained in its current state; as well as help to fund the desired restoration of the parkland for public use.

The client also wishes to raise the point that the parkland surrounding the Blackwell Grange Hotel, and specifically the 0.8 hectare site adjoining the hotel, suffers from anti-social behaviour. Re-development of this area as proposed by the client would eliminate this issue, be beneficial to the amenity of the local environment and enhance visitors' sense of safety.

COVID-19 restrictions have also in effect seen the cessation of house building for a considerable period. The social distancing measures implemented as part of the Government's plan to support our 'new normal' are unlikely to see housebuilding return to the levels required to achieve the much-needed housing to meet the needs of the administrative area of Darlington Borough. This is pertinent because the Framework states that in order for a site to be considered deliverable it should be *"available now, offer a suitable location for development*

now, and be achievable with a realistic prospect that housing will be delivered on this site within 5 years and in particular that development of the site is viable" (2019, Annex 2). This is the case for the proposed development at He2.

Finally the impact of the coronavirus on the tourism industry has been substantial in general, and importantly for the client, it has had significant implications on the function of the Blackwell Grange Hotel. Without the development in the former orchards there are real concerns the current state of the listed building would be compromised.

Yours faithfully,



Claire Hattam MA (Hons), Msc, MRTPI
Senior Town Planning Consultant

Appendix 1

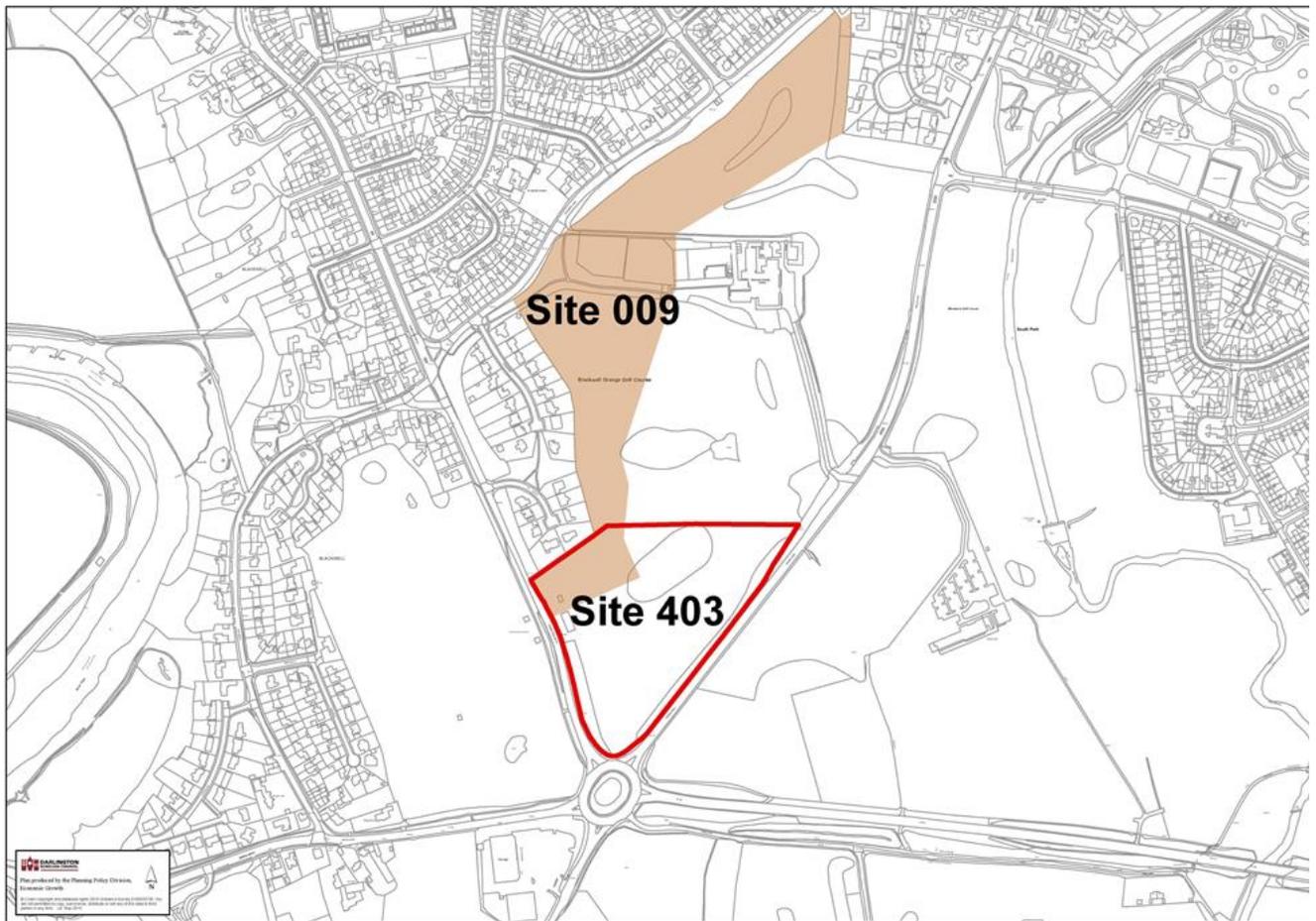
**Extract from Special Cabinet Report (11th February 2020) –
Submission Draft Local Plan – Key Changes**

This document was classified as: OFFICIAL

Summary of Key Changes Housing 33.Policy H2 Housing Allocations;
site 9 Blackwell Grange East – Site 009. It is proposed for this to be
replaced with revised site 403

In response to representations that highlighted the sensitivity of Site
009 relative to the land to the south of the site, it is proposed to be
replaced with revised site 403. A plan of this change is available
p.106

. As shown on the plan below.



Site 009 page 106: **BLACKWELL GRANGE EAST REVISED SITE .**

Site 009 to be removed and replaced with Site 403
This site will have less impact on heritage assets.

Appendix 2

Blackwell Draft Planning and Development Brief (Extract) – Landscape and Restoration Plan



 **DARLINGTON**
BOROUGH COUNCIL

Plan produced by Planning Policy,
Economic Growth

Scale 1:3500 @ A3 April 2017

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Appendix 3

Indicative Sketch Site Plan – Blackwell Grange Hotel

(Box Architects/ McCarthy & Stone)

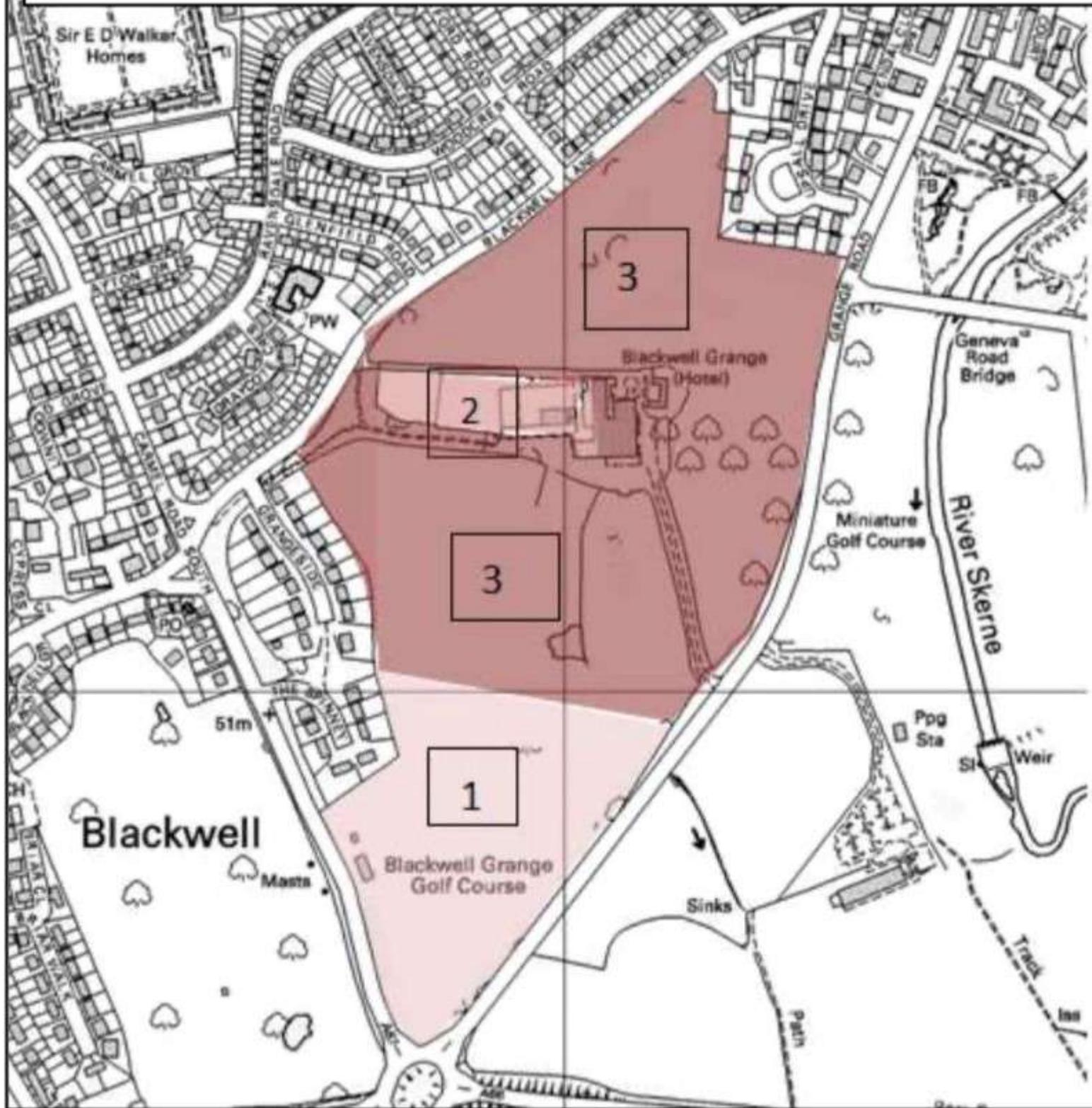
1:500 0 5 10 15 20 25 30 35 40m



Appendix 4

Extract from Blackwell Grange Golf Club Statement of Significance (2012): Zones of Sensitivity Map

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Appendix 5

**Extract from Blackwell Grange Golf Course Statement of
Significance (2012): Figure 19 and Table 2**

Blackwell Grange Statement of Significance

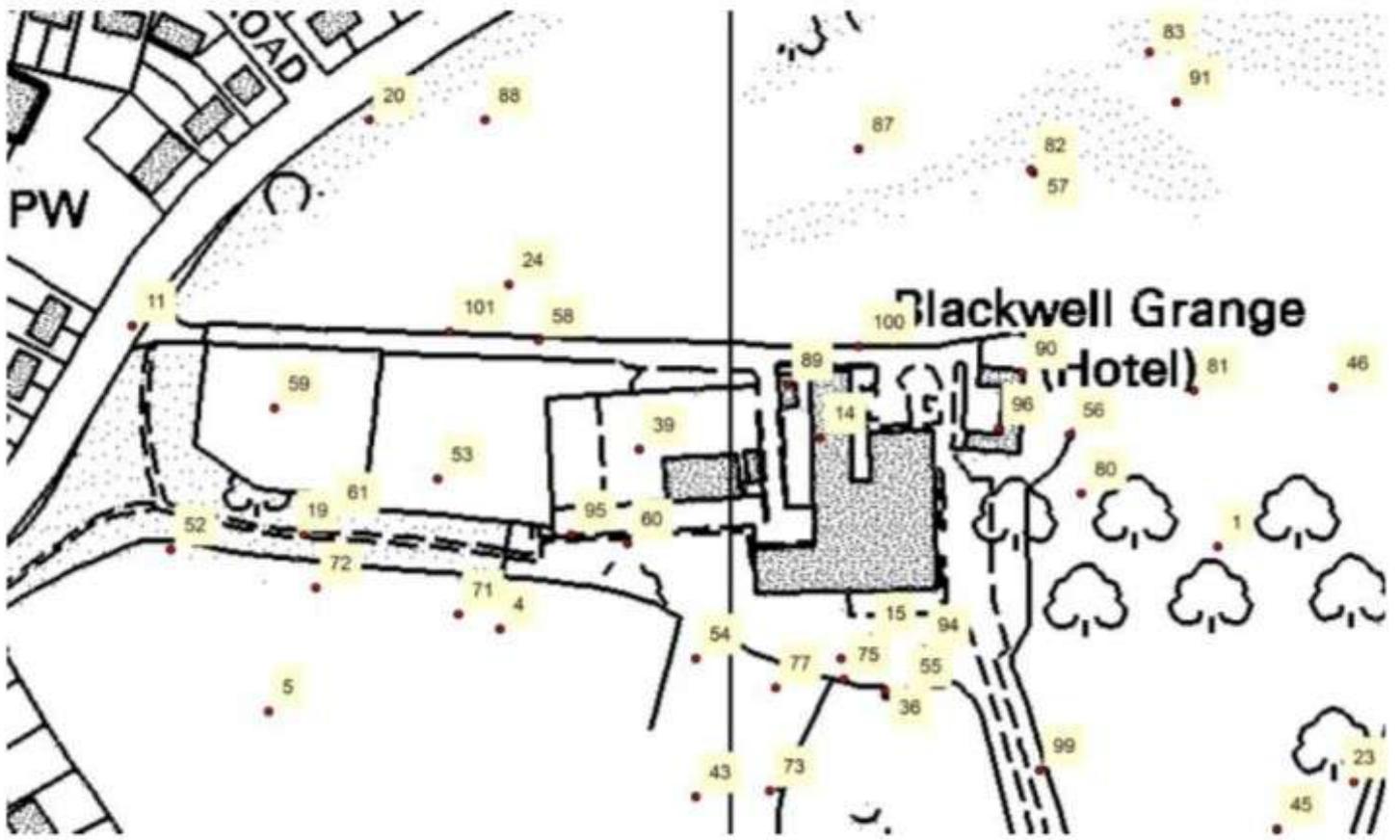


Figure 19. Detailed location map of heritage assets referred to in the statement of significance around the Grange

Blackwell Grange Statement of Significance

Table 2: Significance table

| ID | Easting | Northing | Brief description | Source | Significance type | Significance level | Extent of significance | Notes/ image |
|----|---------|----------|---|---|-------------------|--------------------|---|--|
| 1 | 428164 | 513240 | Lime avenue present before 1790 and referred to in 19 th c accounts as 'ancient'. | 1st ed OS map; 1790 survey, ZDG (A), | Architectural | Considerable | Lime avenue from ha-ha to brick wall on Grange Road – mature limes only |  |
| 2 | 427982 | 513046 | Fish pond shown on survey of pre 1790 and so part of earlier design to go with 1710 house. Still extant | 1st ed OS map, 1802 and 1790 survey ZDG (A) | Architectural | Considerable | All of the pond including stone kerbing and views back to the north |  |

Blackwell Grange Statement of Significance

| | | | | | | | |
|---|--------|--------|---|---------------|----------------|--------------|---|
| 3 | 428016 | 513079 | bath | 1st ed OS map | Historic | Destroyed | Shown on 1 st edition OS map but nothing noted on the ground |
| 4 | 427922 | 513212 | Sunken fence, see also 10, 32, 60, 61, 72 and 75 | 1802 survey | Architectural | Considerable | <i>Extent not clear</i> |
| 5 | 427844 | 513184 | tree clump | 1st ed OS map | Architectural | Considerable | May be absorbed into linear planting which includes 40, now part of drive |
| 6 | 428236 | 513230 | entrance before 1790 – shown as an archway on Grange Road | 1790 survey | Archaeological | Destroyed | No evidence of break in wall so wall of one build over the entranceway |

Blackwell Grange Statement of Significance

| | | | | | | | | |
|----|--------|--------|---|---------------------------------|---------------|--------------|---|---|
| 7 | 428135 | 513030 | entrance from 1802 | 1802 survey | Architectural | Considerable | Includes gates and walling and 'Coach Road' |  |
| | | | lampposts possibly 1950s-50s | | Architectural | Limited | Lamp posts along coach road | |
| 8 | 428114 | 513008 | tree clump to frame entrance | 1st ed OS map | Architectural | Considerable | Mature lime and beech trees | |
| 9 | 428140 | 513037 | tree clump to frame entrance | 1st ed OS map | Architectural | Considerable | Mature lime and beech trees | |
| 10 | 428232 | 513234 | extant sunken fence proposed in 1802, see also 4, 32, 60, 61, 72 and 75 | site visit 22.8.12; 1802 survey | Architectural | Considerable | Wall and earthwork on Grange Road east of the Grange. | Very overgrown |

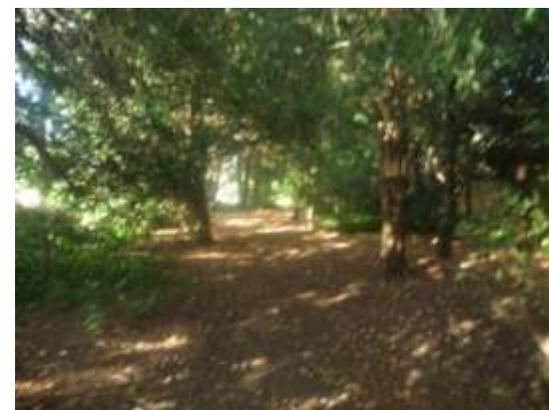
Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|----------------|---------------|--------------|---|
| 11 | 427798 | 513315 | Entrance from Blackwell Lane, present before 1790 with a gate on to Blackwell Lane. Probably original 1710 entrance | 1st ed OS map | Architectural | Considerable | Route of drive and avenue of mature trees associated with it and stone gate posts |
| 12 | 428239 | 513557 | grounds of South Villa | 1st ed OS map | Historic | Limited | Shown on 19 th c mapping but now largely built over as Upsall Drive |
| 13 | 427933 | 513447 | Prescot's stile | 1st ed OS map | Historic | None | Shown on 19 th c mapping only |
| 14 | 428030 | 513277 | orchard | tithe map 1847 | Historic | Destroyed | Now under hotel development |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|----------------------------|---------------|--------------|---|
| 15 | 428047 | 513209 | lawns around house | tithe map 1847 | Architectural | Considerable | Land to south and east of hotel and contained by haha |
| 16 | 428146 | 513629 | Woodside Lodge | 1st ed OS map | Architectural | Destroyed | Mapping evidence only |
| 17 | 427687 | 513066 | Pleasure Walks. See also 18, 20, 21, 22 and 84 | 1st ed OS map; 1802 survey | Architectural | Considerable | Now the west boundary to Grangeside |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|----------------------------|---------------|--------------|---|
| 18 | 427720 | 513204 | Pleasure Walks. See also 17, 20, 21, 22 and 84 | 1st ed OS map; 1802 survey | Architectural | Considerable | Now runs along Blackwell Lane from Grangeside |
| 19 | 427856 | 513244 | Pleasure Walks | 1st ed OS map; 1802 survey | Architectural | Considerable | Walk south of hotel grounds heading west to perimeter pleasure walks along Blackwell Lane |
| 20 | 427878 | 513385 | Pleasure Walks; continuation of 17, 18,22 and 84. Walk becomes less clearly defined further north at no 21 | 1st ed OS map; 1802 survey | Architectural | Considerable | Woodland running parallel to Blackwell Lane |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|----------------------------|---------------|--------------|--|
| 21 | 428065 | 513529 | Pleasure Walks. Continuation of 17, 18, 20, 22 and 84 | 1st ed OS map; 1802 survey | Architectural | Considerable | Woodland running parallel to Blackwell Lane |
| 22 | 428150 | 513487 | Pleasure Walks set out in 1802 survey. Continuation of 17, 18, 20, 21 and part of 84 | 1st ed OS map; 1802 survey | Architectural | Considerable | Mature trees which now form the boundary with Upsall Drive |
| 23 | 428210 | 513160 | Pleasure Walks | 1st ed OS map; 1802 survey | Architectural | Considerable | Mature trees along Grange Road |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|--|----------------|--------------|--|
| 24 | 427925 | 513329 | Avenue of trees along former gravel walk (as called in 1802) | 1st ed OS map; 1790 survey, 1802 survey, | Architectural | Considerable | Mature trees running from Blackwell Lane to Blackwell Grange along gravel walk |
| 25 | 427949 | 513449 | Boundary stone 1 mile to GPO | 1st ed OS map | Architectural | Some | Isolated metal boundary stone |
| 26 | 428316 | 513052 | Blackwell Mill | 1st ed OS map | Archaeological | Some | Site only plus mill race |
| 27 | 428301 | 513186 | Mill race for Blackwell Mill | 1st ed OS map | Archaeological | Some | |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|-------------------|---------------------------------|-----------------|---|
| 28 | 427449 | 512995 | Blackwell Hall | 1st ed OS map | Archaeological | Limited | Destroyed |
| 29 | 427383 | 512981 | Castle Hill | Map evidence only | Archaeological | Unknown | Location on maps |
| 30 | 427999 | 512804 | Mile post Darlington 1/2 mile and Northallerton 15 miles | 2nd ed OS map | Historic | Unknown | Unknown |
| 31 | 427815 | 512840 | Stone building used as animal shed with typical sloping floors for drainage along bays facing length of wall | 2nd ed OS map | Architectural Archaeological | Some Limited | Building Below ground remains of destroyed building adjacent |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|--|---------------|--------------|--|
| 32 | 427748 | 513222 | Low brick wall along watercourse, referred to as a sunken fence in 1802 proposals. See also other sections 4, 10, 60, 61, 72, 75 | 1802 design; site visit 22.8.12 | Architectural | Considerable | Extent of low brick wall along watercourse edge in north part of site |
| 33 | 427755 | 513205 | watercourse, tree lined, shown with two foot bridges over it in 1790. Proposal to turn it into a serpentine lake in 1802 never came to fruition. Ditch now wet in places, but not running with water | 1790 survey; 1802 survey; site visit 22.8.12 | Architectural | Considerable | Length of watercourse now runs across north end of site and no longer runs down the back of Grangeside, but continues west under Carmel Road South |
| 34 | 427854 | 512596 | Guide post | 1st ed OS map | Historic | None | Destroyed |



Blackwell Grange Statement of Significance

35 427895 513022 Mill Lane (centre of) 1st ed OS map Archaeological Limited Route now survives as earthwork east west across the site south of the fishpond



36 428052 513191 Air raid shelter built in 1939 and still extant. Da/NG2/8270 Archaeological Considerable Located in ha-ha ditch south of Grange lawns



37 428091 512961 Front Lodge proposed on 1802 plan ZDG (A) xiv 23 Historic Limited Possibly never built, was located at junction of Mill Lane and Grange Road



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|------------------------------------|-------------------------------------|--------------------------|---|
| 38 | 427793 | 513128 | proposed serpentine lake to be derived from watercourse; to be crossed with two bridges on the Pleasure Walks | ZDG (A) xiv 23 | Historic | Considerable | Extent of watercourse and down rear boundaries of Grangeside |
| 39 | 427969 | 513273 | Walled garden proposed in 1802, now a car park. Site of hot houses visible. A gym has been built in NE corner; boot scraper outside north gate | ZDG (A) xiv 23; site visit 30.8.12 | Architectural Archaeological | Considerable Some | Walls, gates and gateways Below ground information relating to former planting schemes and vertical archaeology relating to hot house construction |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|-----------------------------|----------------|---------------|--------------|--|
| 40 | 427836 | 513140 | tree clump proposed in 1802 | ZDG (A) xiv 23 | Architectural | Considerable | Possibly absorbed into linear planting as part of drive which extends to clump 5 |
| 41 | 427746 | 513168 | tree clump proposed in 1802 | ZDG (A) xiv 23 | Architectural | Destroyed | Now under Grangeside but one mature tree visible on APs |
| 42 | 427816 | 513061 | tree clump proposed in 1802 | ZDG (A) xiv 23 | Architectural | Considerable | Still on boundary of Grangeside |
| 43 | 427988 | 513155 | tree clump proposed in 1802 | ZDG (A) xiv 23 | Architectural | Destroyed | Destroyed by drive |



Blackwell Grange Statement of Significance

| | | | | | | | | |
|----|--------|--------|--|----------------|---------------|--------------|--|---|
| 44 | 428088 | 513064 | shelter planting to drive proposed in 1802 | ZDG (A) xiv 23 | Architectural | Considerable | Mature planting towards south end of coach road | |
| 45 | 428184 | 513144 | shelter planting to drive proposed in 1802 | ZDG (A) xiv 23 | Architectural | Considerable | Mature planting on west side of wall along Grange Road |  |
| 46 | 428203 | 513294 | shelter planting to drive proposed in 1802 | ZDG (A) xiv 23 | Architectural | Considerable | Mature planting on west side of wall along Grange Road | |
| 47 | 428225 | 513377 | shelter planting to drive proposed in 1802 | ZDG (A) xiv 23 | Architectural | Considerable | Mature planting on west side of wall along Grange Road | |
| | | | | | | | See above | |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|------------------------------------|---------------|--------------|--|
| 48 | 427657 | 513221 | shelter planting to drive proposed in 1802 | ZDG (A) xiv 23; site visit 30.8.12 | Architectural | Destroyed | Now under Draycott Crescent |
| 49 | 427898 | 513062 | tree lined avenue present in 1790 | ZDG (A) | Architectural | Some | Mature trees absorbed into drives, no longer form avenue |
| 50 | 427773 | 513026 | tree lined avenue present in 1790 | ZDG (A) | Architectural | Destroyed | Now under The Spinney |
| 51 | 427826 | 513084 | tree clump present in 1790, now two lime trees | ZDG (A); site visit 30.8.12 | Architectural | Considerable | Two lime trees |
| 52 | 427811 | 513239 | tree clump present in 1790 | ZDG (A) | Architectural | Considerable | Part of mature tree planting along pleasure walk south of gardens and orchards (site of) |

Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|---------|----------------|---------------------------|---|
| 53 | 427901 | 513263 | orchard present in 1790 | ZDG (A) | Architectural | Some | Enclosure remains, but now waste with no trees |
| 54 | 427988 | 513202 | tree avenue or orchard in 1790 | ZDG (A) | Architectural | Limited | Some trees may survive, and partial route, but mostly cleared |
| 55 | 428059 | 513191 | formal gardens in 1790 | ZDG (A) | Architectural | Destroyed to create lawns | Lawn area to south of Grange |
| | | | | | Archaeological | Considerable | |
| 56 | 428114 | 513278 | orchard or gardens in 1790 | ZDG (A) | Architectural | Destroyed to create lawns | Lawn area to east of Grange |
| | | | | | Archaeological | Considerable | |
| 57 | 428102 | 513367 | hedgerow or tree lined field boundary in 1790 | ZDG (A) | Architectural | Considerable | Possibly absorbed into 1802 planting which is still extant |

Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|--------------------|---------------|--------------|---|
| 58 | 427935 | 513310 | hedgerow or tree lined field boundary in 1790 | ZDG (A) | Architectural | Considerable | Now tree lined drive which may have absorbed hedgerow |
| 59 | 427846 | 513287 | hedgerow or tree lined field boundary in 1790 | ZDG (A) | Architectural | Considerable | Enclosure |
| 60 | 427965 | 513241 | ha-ha laid out in 1802- referred to as 'sunken fence' | site visit 30.8.12 | Architectural | Considerable | Lawns south of Grange. See also 4, 10, 32, 61, 72, 75 |
| 61 | 427866 | 513250 | ha-ha laid out in 1802- referred to as 'sunken fence' | site visit 30.8.12 | Architectural | Considerable | Extent not clear, see also 4, 10, 32, 60, 72, 75 |
| 62 | 427894 | 513037 | tree grouping of oak, sycamore and lime on 1790 survey and extant | site visit 30.8.12 | Architectural | Considerable | Mature oak, sycamore and lime |

Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|--------------------|----------------|--------------|--|
| 63 | 427963 | 512933 | tree grouping of sycamore and lime on 1st ed map 1860 and extant | site visit 30.8.12 | Architectural | Considerable | Mature sycamore and lime |
| 64 | 427935 | 512743 | isolated tree plus two younger limes | site visit 30.8.12 | Architectural | Considerable | Mature tree |
| 65 | 428110 | 513010 | tree clump on 1802 survey and extant | site visit 30.8.12 | Architectural | Considerable | Mature trees |
| 66 | 428254 | 513376 | Break in brick boundary wall marking infilled entrance? | site visit 30.8.12 | Archaeological | Some | Brick wall opposite road to South Park |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|-----------------------|----------------|--------------|------------------------------------|
| 67 | 428237 | 513209 | end of brick wall circuit | site visit 30.8.12 | Architectural | Some | On Grange Road |
| 68 | 427985 | 512941 | ridge and furrow | site visit 30.8.12 | Archaeological | Some | Throughout field |
| 69 | 428020 | 513041 | field boundary bank with hawthorn shown on 1790 survey and extant | site visit 30.8.12 | Archaeological | Considerable | Runs from fish pond north to ha-ha |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|--------------------|----------------|--------------|----------------------------|
| 70 | 427991 | 513025 | earthwork mound possibly a viewing mound or old tee | site visit 30.8.12 | Archaeological | Unknown | South of field boundary 69 |
| 71 | 427908 | 513217 | ridge and furrow | site visit 30.8.12 | Archaeological | Some | Throughout field |
| 72 | 427860 | 513226 | watercourse with low red brick wall (sunken fence) adjacent, 1802. See also 4, 10, 32, 60, 61, 75 | site visit 30.8.12 | Architectural | Considerable | Along northern boundary |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|--------------------|----------------|--------------|--------------------------|
| 73 | 428013 | 513157 | earthwork hollow joining house gardens and field boundary, possibly an old holloway | site visit 30.8.12 | Archaeological | Some | South of lawns and ha-ha |
| 74 | 428037 | 513202 | continuation of earthwork hollow joining house gardens and field boundary, possibly an old holloway | site visit 30.8.12 | Archaeological | Some | South of lawns and ha-ha |
| 75 | 428038 | 513195 | ha-ha laid out in 1802. See also 4, 10, 32, 60, 61, 72 | site visit 30.8.12 | Architectural | Considerable | South and east of house |



Overgrown, not so clear, suggesting ground levels altered with construction of ha-ha



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|---|----------------|--------------|---------------------------------|
| 76 | 428021 | 513200 | 18th century garden steps in brick with stone steps and finials | site visit 30.8.12 | Architectural | Considerable | Leads from ha-ha south of house |
| 77 | 428015 | 513192 | 20th century tennis court (site of), now a tee | site visit 30.8.12; tee named after a tennis court, but not shown on 1st - 3rd ed maps, but 3rd ed has enclosure | Archaeological | Limited | Below Tennis hole level area |
| 78 | 428043 | 513101 | ridge and furrow, partially planted over | site visit 30.8.12 | Archaeological | Some | Throughout field |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|-----------------------|----------------|--------------|---|
| 79 | 428102 | 513075 | ridge and furrow | site visit 30.8.12 | Archaeological | Some | Throughout field |
| 80 | 428118 | 513258 | 18th century culvert in brick, partially collapsed | site visit 30.8.12 | Archaeological | Considerable | East of haha in wooded area; area of significance extends underground for an unknown distance |
| 81 | 428156 | 513293 | ridge and furrow | site visit 30.8.12 | Archaeological | Some | Throughout field |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|--|-----------------------|----------------------------------|--------------|--|
| 82 | 428101 | 513368 | ridge and furrow | site visit 30.8.12 | Archaeological | Some | Throughout field |
| 83 | 428141 | 513408 | 18th century ice house with north facing entrance; ice house collapsed | site visit 30.8.12 | Architectural and archaeological | Considerable | Large hollow area with two brick foundations of entrance visible. Concrete slab of no interest |
| 84 | 428142 | 513492 | 3 limes forming avenue shown on 1802 survey | site visit 30.8.12 | Architectural | Considerable | Three limes |



Blackwell Grange Statement of Significance

| | | | | | | | | |
|----|--------|--------|--|--------------------|----------------|------|--|--|
| 85 | 428038 | 513461 | views of Cleveland hills possible here; views referred to in 19th c accounts and directories | site visit 30.8.12 | Artistic | Some | Views possible in limited places from higher ground (hills not visible on photo due to grey skies) |  |
| 86 | 428037 | 513441 | ridge and furrow | site visit 30.8.12 | Archaeological | Some | Throughout field |  |
| 87 | 428043 | 513375 | Views of St. Cuthbert's church possible from here | site visit 30.8.12 | Artistic | Some | Very limited views in summer from high ground in NE corner |  |

Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|---|----------------|------|---|
| 88 | 427917 | 513385 | Headland or holloway earthwork heading towards Blackwell Lane | site visit 30.8.12 | Archaeological | Some | Hollow shaped earthwork heading towards Blackwell Lane |
| 89 | 428019 | 513295 | outbuilding in brick with pantile roof, possibly a stable or coach house pre 1860 | site visit 30.8.12; 1 st ed OS map | Architectural | Some | East of walled garden, covers roof and walls. Wide doors appear to be later and so not significant, interiors not seen. Treat as listed |



Blackwell Grange Statement of Significance

| | | | | | | | |
|----|--------|--------|---|------------------------------------|----------------|--------------|---|
| 90 | 428098 | 513299 | 19th century cottage attached to 18th century stable courtyard, part of listed building | site visit 30.8.12 | Architectural | Considerable | Listed 19 th century house, significance covers all elevations, windows, chimneys and rainwater goods, not 1930s door. |
| 91 | 428150 | 513391 | path shown on 1802 survey; adjacent planting of lime avenue remains in part | ZDG (A) xiv 23; site visit 30.8.12 | Architectural | Considerable | Mature trees only |
| 92 | 428254 | 513435 | Drive shown on 1802 survey, now partially under Upsall Drive | ZDG (A) xiv 23; site visit 30.8.12 | Architectural | Limited | Destroyed |
| 93 | 428111 | 591378 | Blocked entrance to boundary wall of 1802 | site visit 30.8.12 | Archaeological | Limited | On Blackwell Lane, blocking not significant |



Blackwell Grange Statement of Significance

| | | | | | | | | |
|----|--------|--------|--|-----------------------|----------------------------|-----------------|--|--|
| 94 | 428065 | 513205 | sun dial shown on 1st ed map 1860 | 1st ed OS map | Historic | Limited | Destroyed | |
| 95 | 427946 | 513244 | summer house shown on 1st ed 25 inch OS map | 1st ed 25 inch OS map | Historic Archaeological | Limited Some | Destroyed Below ground remains only | |
| 96 | 428090 | 513280 | 18 th c Stable courtyard (listed grade II) | Site visit 30.8.12 | Architectural | Considerable | All courtyard buildings and spaces including wood store and mounting block |  |
| 97 | 428132 | 513044 | Metal estate rail fencing with acorn topped finials, probably 19 th century | Site visit 30.8.12 | Architectural | Some | All metal estate fencing and kissing gates |  |

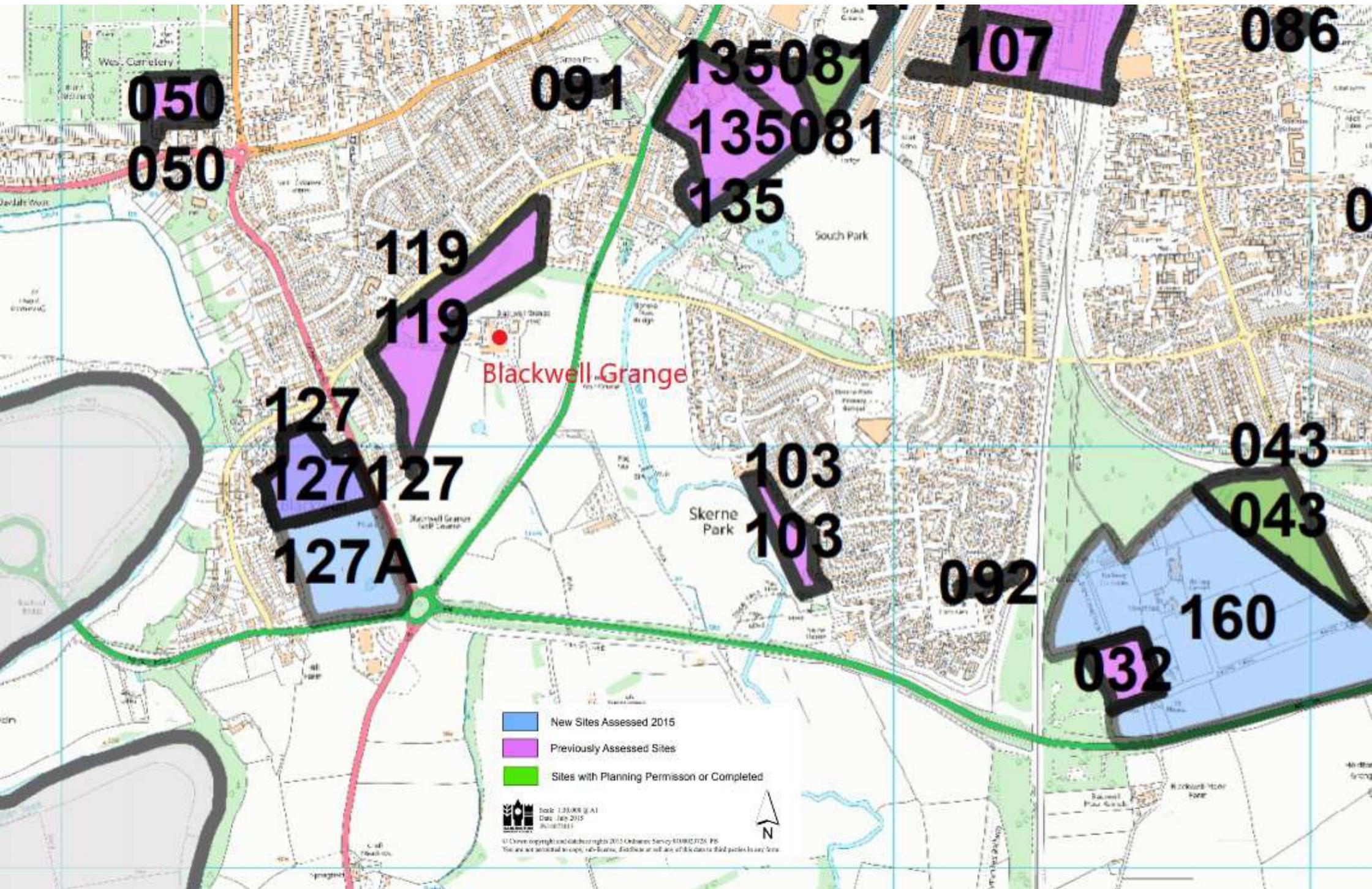


Blackwell Grange Statement of Significance

| | | | | | | | |
|-----|--------|--------|--|--------------------|---------------|------|--|
| 98 | 428112 | 513066 | Metal estate rail fencing with acorn topped finials, probably 19 th century | Site visit 30.8.12 | Architectural | Some | All metal estate fencing and kissing gates, mostly along coach roads |
| 99 | 428104 | 513164 | Metal estate rail fencing with acorn topped finials, probably 19 th century | Site visit 30.8.12 | Architectural | Some | All metal estate fencing and kissing gates mostly along coach roads |
| 100 | 428043 | 513308 | Metal estate rail fencing with acorn topped finials, probably 19 th century | Site visit 30.8.12 | Architectural | Some | All metal estate fencing and kissing gates, mostly along coach roads |
| 101 | 427905 | 513313 | Metal estate rail fencing with acorn topped finials, probably 19 th century | Site visit 30.8.12 | Architectural | Some | All metal estate fencing and kissing gates, mostly along coach roads |

Appendix 6

Darlington Borough SHLAA (Update 6) – Appendix 5i – Urban Area Extract



Appendix 7

Darlington Borough SHLAA – Update 6 Extract (Site 119)

| Site No. | Site Name | Suitable ? | Suitability details | Available ? | Availability details | Achievable? | Achievability details | Constraints |
|----------|---|------------|--|-------------|--|-------------|---|---|
| | | | | | | | | be adopted before 2015. |
| 119 | Blackwell Grange East | Y | <ul style="list-style-type: none"> Identified for draft top-end executive housing allocation in the MGPPPO. A 6 week consultation is running from 17th July to 28th August 2015, on proposals for mixed housing including top-end executive housing on this site and site 127. | Y | DBC land, declared surplus in June 2013, and now vacant. Disposal expected from Autumn 2016. | Y | DBC disposal awaiting Local Plan Inspector's report. | Any development must be of the highest quality to not significantly adversely affect the setting of the Listed Building, Blackwell Grange. Amendment to planning policy would be required; allocations document not likely to be adopted before 2015. |
| 120 | Land south of Allington Way, McMullen Road | Y | <ul style="list-style-type: none"> Design and layout would need to address residential amenity issues arising from industry and roads adjacent to the site. | Y | No resolution to dispose, but DBC AH scheme proposed. | Y | HCA AHP2 funding secured. Start planned for Oct 2016 | Wildlife corridor down the W side of the site. Multiple potential sources of contamination in the vicinity. Road traffic and noise from commercial/industrial premises. Traffic impact may be of concern. |
| 121 | Glebe Road | N | <ul style="list-style-type: none"> Site was included as a draft housing allocation in MGPPPO. Analysis of open space needs in this area more generally is required if it is to be considered suitable. | N | No resolution to dispose. | Y | Would not be achievable until the lost playing field is reprovided- therefore, not deliverable now. However, in principle a viable area and site. | Traffic impact would probably need to be assessed and junction works required. |
| 122 | Fmr Beaumont Hill Middle School Playing Field | Y | <ul style="list-style-type: none"> Planning permission granted in 2014. Scheme commencing this year with HCA funding. | | | | | |
| 123 | Darlington School of Maths and Science | Y | Existing school and part of playing fields/associated hard surfaces. | N | Not available. No resolution to dispose. | N | Needs further investigation. | Potential sources of contamination in the vicinity. It is likely that improvement works would be required at accesses to the site. |
| 124 | Argon/Spencer IE land | N | <ul style="list-style-type: none"> Land has been identified for draft employment allocation in MGPPPO. Not suitable as site is important part of the employment land portfolio. Poor proximity to services. Planning permission granted for retail on southern part June 2015. | Y | Mixed use scheme including housing and office development has been promoted in the past (MGPPPO consultation) however retail use is now being pursued. | N | Contamination and proximity to industrial uses likely to render site unviable and unmarketable for housing. | Major environmental health concerns re noise from industrial estate. Site investigation and likely remediation. Significant contribution to improvement works on A68 likely required. Noise Assessment, Transport Assessment and Travel Plan needed. Wildlife concerns. |
| 125 | Former Springfield | Y | | Y | Resolution to dispose in place. Negotiations with DCC on | Y | HCA funding secured by Thirteen for 20 units by 2017, | Lost playing field would need to be re provided. |

Appendix 8

Darlington Borough SHLAA (Update 6) – Appendix 8 – Constraints on Deliverability and Developability of Potential Housing Sites

Constraints on the Deliverability and Developability of Potential Housing Sites

| Nature Constraint | Sites Affected | How Constraint is Being Addressed | Timescale |
|--|---|--|---|
| SHOWSTOPPERS | | | |
| c. Lack of an up-to-date adopted development plan with housing allocations. | All potential housing sites outside development limits and sites within development limits identified as E3 open land in the Local Plan. | Preparation of Making and Growing Places DPD, which will allocate new sites for housing and review development limits. The recent Gladman planning appeal decision may reduce the effect of this constraint in the short term, until the Council can demonstrate it has a 5 year land supply. | Preferred Options published in Summer 2013, and revised housing sites proposals in June 2014. Publication not now expected before autumn 2015, and adoption before autumn 2016. |
| f. Major industrial hazards | 11: Eastmount Road 71: Town Centre Fringe 42: Coniscliffe Grange Farm 80. Broken Scar WTW | Site 11 and 71: Northern Gas Networks have a programme to decommission gas holders nationally. The removal of the gas holder on Valley Street could move up that programme if there is sufficient prospect of development activity that would otherwise be delayed. Sites 42 and 80: it has been established that the existing hazard zone around Broken Scar WTW relates to chlorine storage not now on the site. There is no HSE constraint on replacement storage but proximity to Site 42 means NWL would be concerned if development took place there. | Sites 11 and 71: Both sites can come forward after decommission of the gas holder which is expected to be 2020 at the latest. Site 42 and 80: in addition to HSE constraint, both sites appear to be landlocked – potential accesses to 42 are constrained by TPOs and capacity issues, access to site 80 by the operational WTW to the south. Further investigation of both will be made in 2015. |
| CAPACITY CONSTRAINTS | | | |
| f. Major industrial hazards | 11: Eastmount Road 71: Town Centre Fringe 42: Coniscliffe Grange Farm 80. Broken Scar WTW | Site 11 and 71: Northern Gas Networks have a programme to decommission gas holders nationally. The removal of the gas holder on Valley Street could move up that programme if there is sufficient prospect of development activity that would otherwise be delayed. Sites 42 and 80: it has been established that the existing hazard zone around Broken Scar WTW relates to chlorine storage not now on the site. There is no HSE constraint on replacement storage but proximity to Site 42 means NWL would be concerned if development took place there. | Sites 11 and 71: Both sites can come forward after decommission of the gas holder which is expected to be 2020 at the latest. Site 42 and 80: in addition to HSE constraint, both sites appear to be landlocked – potential accesses to 42 are constrained by TPOs and capacity issues, access to site 80 by the operational WTW to the south. Further investigation of both will be made in 2015. |
| h. Flood risk issues | 147. Land South of Andrew's Close 152. Auckland Oval Open Space / Faverdale Black Path 157. Land adjacent to Linden Court, Hurworth Place | Part of site 147 could be developed without flood risk, but heritage and green wedge issues would need to be resolved. The remainder of Site 157 would be too small, and 152 has other constraints (open space used). | During 2015 as part of finalizing the MGP document for Publication. |
| SPEED OF DELIVERY CONSTRAINTS | | | |
| a. Private house builder appetite. Whilst activity has picked up significantly, there is still caution amongst | All. | Factors affecting the housing market largely outside the control of the planning system. | Only moderate market conditions expected for the next 4 years, because of national commitment to austerity. |

| Nature Constraint | Sites Affected | How Constraint is Being Addressed | Timescale |
|--|---|--|--|
| house builders, developers and owners of land to sell and progress the development of suitable sites in the current market conditions. This is reflected in relatively low forecast annual build out rates per site from builders. | | DBC is working proactively with RSLs on delivering schemes for the 2015-18 HCA Affordable Housing Programme, and undertaking its own programme of house building on Council owned land to bring forward additional new affordable housing. | Throughout the 5 year period. |
| b. Land Availability: DBC has not resolved to sell some of the sites in Council ownership that were identified as suitable. | 53: Sherbourne Close 55: Mayfair Road 58: Sparrow Hall Drive 61: Park Place South 62: Park Place North 64: Blackett Road 66: Banks Road 154. Former Jack Horner's Public House, Whitby Way 155. Central House 156. Land at Town Farm, Sadberge | The Council's Estates section does not generally have the resources to secure outline planning permission for its sites prior to disposal. Resolutions to sell either have been or will be secured for all sites proposed for housing in the emerging site allocations DPD. | By autumn 2015 |
| d. Contaminated land. Because there are still relatively low land values on PDL land across the Borough, sites with particular costly constraints to overcome, such as contaminated land, may not be viable yet. | 10: Green Street Motors 12: Ward Bros 38: Rushpool Cottage 41: Whessoe Road 48: Albert Road 64: Blackett Road 71: Town Centre Fringe 72: Lingfield Point 94: Ruck, Cockerton Club 105: Rear of Heron Drive 107: Cattle Market 108: Former Wentworth Self Drive 149. North of Burtree Lane 152. Auckland Oval Open Space / Faverdale Black Path 157. Land adjacent to Linden Court, Hurworth Place 160. Land at Snipe Lane, Neasham Road 161. Land South of Faverdale and North of Faverdale Black Path. | Survey and remediation are for the owners/potential developers to address. DBC may be able to assist in some cases. Some ideas on how to bring forward brownfield sites are included in Local Brownfield Strategy, Nov 2011. There is little prospect of public sector gap funding in the short-medium term, but the Council is in continuous engagement with the HCA to try and secure this, should new funding streams become available. | Consider options to develop on contaminated land within next 2 years as part of work to prepare MGP. Ongoing. |
| e. Relocation of existing businesses and uses. | 7: Darlington Timber Supplies 10: Green Street Motors 11: North of Eastmount Road 41: Whessoe Road 43: Neasham Road 48: Albert Road 50: Woodburn Nurseries 61: Park Place South 62: Park Place North 63: Police Station 107: Cattle Market 114: Royal Mail Sorting Depot | Site 7: occupier has a site value threshold to achieve before relocation can be considered. Site 11: Once gas holder is decommissioned which is expected to be 2020 at the latest, it is likely that a greater number of housing will be developed. Site 41: tenure extended for a limited period for occupants and it is understood there is a break point on southern part of site in 2015. Site 50: use relocated, and site was marketed in 2014. Sites 61, 62: Parking Strategy (2014) does not indicate that these are no longer needed. Likely to be needed for car parking in the short-medium term. Site 63: no current plans to relocate. Site 107: Minded to grant planning permission still in place, but there is still a funding gap in the plans to relocate the cattle mart. Site 114: now wish to remain on the site. | Site 41: new proposals for larger area of land likely to exclude this part. |
| g. Impact on the strategic highway network | 71: Town Centre Fringe 72: Lingfield Point Large urban extensions: sites 14, 19, 20, 22, 40, 42, 49, 97. | Highways issues for Site 72 resolved. Transport modelling carried out for Town Centre Fringe. | Impacts being considered through current work on Tees Valley Transport Area |

| Nature Constraint | Sites Affected | How Constraint is Being Addressed | Timescale |
|-------------------|---|-----------------------------------|--|
| | Large village extensions: sites 25, 27, 46, 110, 111. 148. East of A167, Beaumont Hill 150. Land at Low Beaumont Hill Farm. | | Action Plan and transport modelling for the MGP. |

Appendix 9

Draft Sustainability Appraisal Report Extract – Appendix G – Assessment of Development Site Options

Site 9: Blackwell Grange East

APPENDIX G: ASSESSMENT OF DEVELOPMENT SITE OPTIONS

Site 9: Blackwell Grange East

Table Site 9

| Site Reference | 9 | | Current Use | Disused golf course/open space | |
|----------------------------|--------------------------------|-----------|----------------------------|--------------------------------|-----------|
| Site Name | Blackwell Grange East | | Proposed Use | Housing | |
| | | | Potential Housing Yield | 43 | |
| Site Area (Ha) | 8.26 | | Potential Employment Yield | n/a | |
| Site Constraints | Area covered (Ha)/Length (m) * | % of site | Site Constraints | Area covered (Ha)/Length (m) * | % of site |
| Flood Zone 2 | 0.00 | 0% | Tree Preservation Order | 26 TPO'd trees & 1 group TPO | 11% |
| Flood zone 3 | 0.00 | 0% | Ancient Woodland | 0.00 | 0% |
| Grade I Listed Building | 0.00 | 0% | SSSI | 0.00 | 0% |
| Grade II* Listed Building | 0.00 | 0% | Local Nature Reserve | 0.00 | 0% |
| Grade II Listed Building | 0.00 | 0% | Local Wildlife Site | 4.05 | 49% |
| Conservation Area | 0.00 | 0% | Local geological sites | 0.00 | 0% |
| Scheduled Monument | 0.00 | 0% | Landfill site | 0.00 | 0% |
| Historic Parks and Gardens | 0.00 | 0% | Major industrial hazards | 0.00 | 0% |
| Public Right of Way* | 0.00 | - | Minerals consultation area | 0.02 | 0% |
| Open space | 0.00 | 0% | High Pressure Gas Mains* | 0.00 | - |
| Playing fields | 0.00 | 0% | Overhead Powerlines* | 0.00 | - |
| Access to Services | Distance within (metres) | | Access to Services | Distance within (metres) | |
| Primary school | Within 1200m | | Train station | Beyond 1600m | |
| Secondary school | Within 1200m | | GP practice/hospital | Beyond 1600m | |
| Higher education | Within 1600m | | Local or district centre | Within 1600m | |
| Employment area | Within 1600m | | Open space | Within 400m | |
| Frequent Bus Service | Within 400m | | Playing field | Within 800m | |

| Site Reference | 9 | Significance of effect | Commentary |
|---|-----------------------|------------------------|--|
| Site Name | Blackwell Grange East | | |
| Sustainability Objective | | | |
| 1. Provide a mixture of affordable, well designed and sustainably located new housing, and improve the standard of existing housing, especially to provide for young people, families and older people. | | + | The site is not well served by services and facilities but has good connections to existing footpaths, cycle routes and public transport. Able to provide an element of affordable housing and lifetime homes. The site is reasonably well connected to the town centre. |
| 2. Develop vibrant and cohesive communities. | | -- | Site development will result in the loss of open space (disused golf course) with no prospect for replacement. Able to provide an element of affordable housing and help support existing local community facilities. |

APPENDIX G: ASSESSMENT OF DEVELOPMENT SITE OPTIONS

| | | |
|---|-----|--|
| 3. Improve the health and wellbeing of all, reduce health inequalities and promote healthier lifestyles. | - | Site has good access to green infrastructure and the public rights of way network, but would result in the loss of existing open space. Site does not have good access to existing health facilities. Majority of site is greenfield land. Site is not large enough to provide allotments as part of development. |
| 4. Provide education and training opportunities to improve the skills and employment prospects of the resident population. | ++ | Access to a bus route with frequent service to higher education facilities in Darlington (requires changing buses in Darlington). Within 2km of a higher education establishment. Polam Hall School is the closest primary school (awaiting information on school capacity), but there are other primary schools in the vicinity. |
| 5. Improve the safety and security of people and property. | 0 | The site will have no detrimental impact on safety and security. |
| 6. Achieve sustainable levels of economic growth and increase employment levels and access to sustainable and high quality employment opportunities | 0 | Site promoted purely for non-employment/commercial use. Site is not close to a town or local centre. |
| 7. Encourage sustainable travel. Provide development which reduces reliance on private vehicles, maximising access to public transport and active travel modes. | + | Site is located close to a bus route with a frequent service allowing access to services/facilities and job opportunities. Site development will have some localised transport/accessibility impacts but these are likely to be minor in nature and can be mitigated. Access off Blackwell Lane would be preferred from a traffic management perspective, but also possible off Carmel Rd. |
| 8. Reduce greenhouse gas emissions and increase the borough's resilience to climate change. | +/- | All new development will have an impact but will be required to adhere to relevant national standards (construction, materials, energy efficiency of building). |
| 9. Make the most efficient use of land and property. | 0 | Site classified as urban (ALC - provisional). Majority of site is greenfield land. Site adjacent to a minerals consultation area. Site is unlikely to contain contaminated land. |
| 10. Minimise levels of noise, vibration, odour and light pollution. | ++ | There are no obvious sources of potential noise, vibration, odour and/or light pollution close to the site. |
| 11. Avoid and reduce flood risk from all sources including fluvial, surface water and sewer flooding. | ++ | Site is entirely within Flood zone 1. |
| 12. Protect and enhance air and water quality and make efficient use of water. | - | Site is likely to have a limited effect on local air quality that could be mitigated. |
| 13. Protect and enhance biodiversity and geodiversity. | - | Blackwell Grange Golf Course Local Wildlife site. The site contains numerous TPO trees/groups that form a continuous strong tree belt along its northern boundary, to the north of the drive and across the centre of the site. Site is within an area of high interest with regards to Great Crested Newts. |
| 14. Protect and enhance green infrastructure of all types. | - | The southern half of the site is part of the Blackwell Grange Golf Course Local Wildlife site. Loss of existing open space. |
| 15. Protect and enhance the character and quality of Darlington's landscape. | - | Loss of parkland setting. |
| 16. Conserve and enhance Darlington's distinctive and valuable historic environment. | -- | The site forms part of the grounds to the Grade II* listed Blackwell Grange Hotel (and Grade II listed outbuildings). Development will affect setting of the Grade II listed Blackwell Grange and its parkland curtilage. Significant mitigation and public |

APPENDIX G: ASSESSMENT OF DEVELOPMENT SITE OPTIONS

| | | |
|----------------------------------|---|---|
| | | benefit required to offset the harm caused. Potential to better reveal the approach to Blackwell Grange along the historic drive from Grange Road. |
| Overall Predicted Effect: | The site forms part of the grounds to the listed Blackwell Grange Hotel and was previously uses as a golf course but not for some time. The site is not well served by services and facilities but has good connections to existing footpaths, cycle routes and public transport. The site should be capable of providing an element of affordable housing to help meet local needs. Development would result in the loss of open space. Development will affect setting of the Grade II listed Blackwell Grange and its parkland curtilage. | |
| Potential Mitigation: | <ul style="list-style-type: none"> ● Would need significant mitigation to restore the remaining parkland area to the Grade II Listed building. ● Habitat improvements required throughout the site and on the parkland area to the south of former Mill Lane. ● Retention and maintenance of TPOd trees on site. ● Site development would require mitigation for the loss of open space. ● Possible HE contribution towards additional traffic on A66/Blands Corner. ● Make suitable provision for the education needs of new residents. ● Provide for the infrastructure needs of the development (including utilities, highways, community facilities and open space). | |

Appendix 10

Blackwell Grange Planning and Development Brief Consultation Comments and Officer Comments on Development Plot He2

HE2 Comments – Referring to HE2 Specifically

| HE2 – General | | |
|--|---|---|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| BL008; BL035; BL049; BL071; BL073; BL104; BL149; BL149 | Character of the site will not be maintained by building blocks of flats on it, no matter how much money they will be sold for; In the winter the flats will be very visible from Blackwell Lane (2) | (2) Look at lower level high density schemes that would imaginatively sit well within the setting not above it. |
| BL008 | Do not believe that by the Council saying they will be exclusively for the elderly, that they will actually be used for this purpose. Developers who build for the retirement market would not be interested in the location due to lack of services and it would be easy for the Council to say that they could not get buyers for the retirement market so the apartments will have to be sold to regular developers. | |
| BL009 | Disgusted at the Council's plans for housing on the historic Blackwell Grange Parkland | |
| BL009 | Could you tell me the total number of houses / apartments proposed | |
| BL009 | Totally opposed to flats as they are normally built to rent out | |
| BL009 | Three storey flats too high | |
| BL015 | Too many existing apartments in the town that are vacant so no need for more | BL015 - Should be returned to being a Hotel and Golf Course |
| BL027 | How high will flats be built | |
| BL044 | Concerns relating to density of dwellings, particularly with respect to increasing the density of housing above the original 6 per hectare | The area should be left clear |
| BL012 | Previous experience of living in a flat at Scholars Park and had persistent problems with Anti-Social behaviour (noise, littering etc.) particularly from one flat used for 'holiday let'. | |
| BL031 | Flats should not be visible above the trees on Blackwell Lane | |
| BL034 | Concern regarding sudden addition of apartments to the plan. Should be located off Grange Road to minimise impact. | Apartments should be removed. |
| BL054 | Perceived back tracking by the council on the 'top-end executive' offer. Flats and apartments for the elderly are seen as a sop. Would occupancy be conditioned? | |
| BL064 | Hotel operator - Support for the principle of development in this location has previously been received through the site allocation process and pre-application advice. Note the Council's existing policies on housing suitable for older people and commissioned their own Care Needs Assessment in January 2015 which identified further need for extra care/sheltered housing within the local area. Includes indicative site plan for development of the site. | |

| | | |
|--------|--|--|
| BL064 | Hotel operator - an extra care/sheltered housing facility at HE2 would help meet housing need (including Use Class C2), stimulate the housing market, provide facilities for the wider community and facilitate the long term retention of the hotel. | |
| BL071 | There are no blocks of flats or three storey homes on the lane to set a precedent. | |
| BL071 | If the intention is to improve the area for the elderly, independent living should be the way forward rather than the money making for profit ideas of assisted living. Where the only motive is for private companies to make profit for themselves rather than help the character and health of the surrounding area. | |
| BL073 | Object to development of houses and three storey flats | |
| BL071 | The hotel has applied to lease the land in a historical walled garden which used for overflow parking on extended terms (possibly 99 years) with the intention of demolishing the only fitness centre in the area and used by many elderly and young residents. Making the hotel less attractive for reservations or future possible leasing as it will have no facilities or sufficient parking for customers and people attending functions. | |
| BL0073 | Reduce the value of my property | |
| BL073 | Reason for purchasing family home was to live in a quiet, semi-rural location, with an extremely attractive outlook in an area of natural beauty adjacent to golf club and countryside. This was reflected in the purchase price of our house. | |
| BL160 | Dismayed to see the plans increase the dwelling numbers. Has there been any market analysis undertaken to justify the increase? While there is a growing and ageing population it is not feasible to assume that there is a realistic demand for older people wanting to move from their homes. Typically older people only move in response to a crisis (health decline, etc.) there are no pre-emptive decision makers in terms of housing future and there is no mention that these dwellings would be assisted living / warden controlled. | |
| BL160 | It is reasonable to conclude that the more you build, the less 'executive' or desirable the location becomes and thus the price of the new housing and those around it. | |
| BL160 | Despite consultation and objections raised, it appears a done deal in balancing the Council's books. Can the Council Clarify the expected build rate of dwellings? It is unfair to expect residents to endure building site noise, dirt and disruption over a number of years as was intimated in the first round of council's responses. | Removal of all HE2 dwellings proposed. |

| | | |
|-------|---|--|
| BL162 | Proposed sites inappropriate as the majority of them in areas of historic significance where no development should be pursued, and have been hugely enlarged in the second consultation to include apartment blocks and roads through the parkland as well as possible large breaches in the listed perimeter wall. | |
| BL162 | Important that careful thought should be given to the future of the entire site including the Grange, which although currently leased to Forestdale Hotels, belongs together with the parkland to the town of Darlington. | |

Officer comments

The site is part of the setting of the Grade II* Listed Building, however this does not mean that no change or even no harmful change can take place. Paragraph 134 of the National Planning Policy Framework allows for less than substantial harm, providing there are public benefits.

The proposed development is sufficiently far away from existing houses (twice the adopted separation distance) and separated by a public highway and a substantial belt of mature trees such that there will be no overlooking, overshadowing, overbearing or loss of privacy.

The current proposals are for luxury apartments aimed at the retirement market. We cannot make decisions on what may or may not happen in the future. If circumstances change and an application is submitted to vary the planning conditions, then the variation will have to be considered at that time taking into account all relevant planning matters.

Measures are in place through environmental health regulations to control statutory nuisance for things like noise and litter. However, these problems are not generally associated with apartments occupied by older people.

At two and a half storeys, roughly the height of the existing houses on Blackwell Lane, the proposed apartments would be below the height of the tree belt along Blackwell Lane.

Building on the Grange Road of the site is more sensitive from a Listed Building perspective because it includes both the original and the later access to the building and allows for views of the primary, front, elevation. In terms of impact on the former parkland, the Blackwell Lane side of the site has already seen housing development in the form of Grangeside and The Spinney. Historic England have advised there is only so far east new development could extend on the site before substantial harm (as identified in paragraph 133 of the National Planning Policy Framework) would occur. Housing on this part of the site was ruled out early on for this reason.

While the existing built environment helps to set the context, just because there are no apartments along Blackwell Lane that is not a planning reason for refusal.

There are different models of assisted living from independent living with care services brought in as required (similar to visits from the District Nurse) to residential homes for the elderly. In this case, the proposals are for the former.

Until a planning application is submitted, the intentions of the Hotel operators are pure speculation. However, the Council is keen for investment to go into Hotel improvements.

Loss in value of homes is not a planning matter. However, research undertaken by London School of Economics found that prices of existing houses sometimes fell while construction was going on but once the developments were completed, the local areas generally moved with the market. Researchers could find no evidence of longer-term negative impacts.

In terms of the need for accommodation for older people, Darlington has an aging population and the Council's Supported Housing Strategy Appendix 2 calculates that by 2025 there will be a requirement for an additional 163 Extra Care for sale units and an additional 981 Sheltered for sale units for people aged over 75. These figures do not include the needs of people below the age of 75. The clear message is there is a shortage of choice for people who want to purchase specialist elderly accommodation.

There is a balance between the amount of development and the continued attractiveness of the parkland setting. However, the proposed development will be high quality, high specification, in a very attractive parkland setting, in a desirable residential suburb.

The build rate will be determined by the market.

There are no roads proposed through the parkland, only footpaths, and no large breaches proposed in the listed perimeter wall.

| HE2 – Master plan | | |
|--------------------------|---|---|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| BL012 | Inclusion of apartments would be detrimental to the vision for 'high end executive housing' and will put off some 'high end' purchasers. | |
| BL012; BL071 | Majority of flats would be buy-to-let investments which would be a marked departure from the largely owner occupied properties in the area. Leading to a greater turnover of residents and loss of community feel. We will have letting signs all the way along the lane. | |
| BL109 | Extra care accommodation has some merit, although expected yield may not be achieved. Support proposal to demolish existing gym and replace with sympathetically designed apartments, but concerned about building in other areas due to car parking requirements near the hotel. | Proposals should pay full regard to the sensitive historic setting. |

| HE2 – Master plan | | |
|--------------------------|--|--------------------------------------|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| BL151 | Not clear whether development will extend beyond the walled garden or not from description/plans. Concern regarding hotel parking being built on and replacement provision. | |
| BL155 | Previous plans were reasonable but new plans involve selling land off to developers and putting in apartment blocks and care/assisted living blocks are unreasonable, all with access via the hotel drive. | Go back to original plan. |
| BL156 | Apartment blocks proposed at rear of the hotel are acceptable as they are in a well landscaped area and accessed by an existing private road. | |
| BL174 | Support the idea of apartments around the hotel compared to many large detached houses - Big is not always better. | |

Officer comments

Provided the apartments are high quality, luxury apartments there is no reason to suppose they will put off high end purchasers. The planning permission could be conditioned to include an age restriction to the over 55s which should reduce turnover rates. The impact on the setting of the Listed Building is an important consideration and any scheme will be agreed with Historic England. The design and massing of the apartments would be agreed with Historic England.

The proposals extend into two parcels of land beyond the walled garden.

| HE2 - Heritage | | |
|-----------------------|---|--|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL043 | Concern over loss of wall | Blackwell Lane wall should be retained |
| BL044 | Concerns over additional loss of parkland. The parkland is an asset of the town. High density housing and apartments will destroy this heritage | The parkland should be conserved |
| BL064 | Hotel operator - consider the area to the West of the hotel to be the least sensitive and note that the statement of significance highlights the scope for the walled garden and former orchard to be brought back into use, including for residential use. Consider that allocating HE2 would bring heritage benefits by facilitating improvements to the listed buildings and removing unsympathetic developments in the walled garden. | |

| HE2 - Heritage | | |
|-----------------------|--|---------------------------------|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL009 | Most concerned that any permitted development on HE2 the former Orchards of Blackwell Grange is carried out with the greatest sensitivity and retains the key historical features. | |
| BL083; BL084 | Statement of Significance stated He2 and He3 is of historic and environmental interest, this has been disregarded. | |
| BL162 | Any permitted development in the site, the former orchards of Blackwell Grange is carried out with the greatest sensitivity and retains the key historical features and the beautiful trees which border here. | |
| BL162 | Suggest that rather than pursuing housing development in this area, the Council should follow the recommendations set out in the 2012 Statement of Significance and pursue a positive and protective course of action which seeks designation of the park as a historic landscape, requests funding from the HLF to perform the necessary conservation and restoration work and extends the centre of Darlington Conservation area to include this valuable historic resource. | |

Officer comments

The former parkland, has since 1971 until relatively recently been in use as golf course. The parkland does not meet Historic England's criteria to be registered as an Historic Park and Garden as a result of the changes that have taken place on the site over the years. There are plans to enhance the former parkland and create a local nature reserve, funded by development on the site.

The site is part of the setting of the Grade II* Listed Building, however this does not mean that no change or even no harmful change can take place. Paragraph 134 of the National Planning Policy Framework allows for less than substantial harm, providing there are public benefits. We have received advice from Historic England that the allocation of the site for relatively low density, top-end executive housing would constitute less than substantial harm. Impact upon the listed building has been assessed and has been guided by advice from Historic England. Their advice gave us a steer that the site has some more development potential than the Archaeo-Environment Report of 2012 advises. The Statement of Significance (produced by Archaeo- Environment for the Council) has not been disregarded, but Historic England has provided us with different advice about the development potential of the site. It is not uncommon for professionals to have different opinions on subjective matters, based on interpretation of legislation and policy. Historic England will also advise on any future planning applications for development on the site. Historic England has been consulted and their response can be viewed online (Ref No. BL79).

The boundary wall is curtilage Listed so alterations or any loss require prior Listed Building Consent. The proposed development has no impact on the boundary walls. The preferred access uses the existing rear access to the Hotel.

A satisfactory solution to the displaced Hotel parking will be an important consideration for any proposal to develop within the walled garden.

| HE2 - Trees | | |
|----------------------|--|---|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL043; BL009 | Concern over loss of trees | Blackwell Lane trees should be retained |
| BL109 | Tree perimeter of HE2 should be retained to screen new buildings from Blackwell Lane and the Hotel. | As comments |
| BL163 | A substantial number of trees will need to be removed, including those with TPOs, affecting the strong tree canopy, character of the area and wildlife habitats. | |

Officer comments

It is recognised that the existing trees are a very important element of the area. The vast majority will be retained. The number felled will be kept to an absolute minimum and they will be protected from damage during construction. Any planning application for residential development will be assessed on this basis, together with all other planning considerations.

| HE2 - Wildlife | | |
|-----------------------|---|---------------------------------|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL044 | Concerns over additional loss of habitat | The area should be left clear |
| BL064 | Hotel operator - note that the site compares favourably to others in terms of impact on ecology, specifically great crested newts | |

Officer comments

Natural England has set out specific requirements within its response and will maintain a watchful eye over the proposals for residential development. It can also exercise

control at the planning application stage, not only as a consultee but also through the issuing or non-issuing of licences. With appropriately designed development and protection of wildlife during the construction phase, the impact on wildlife can be minimised. The proposals to create new wildlife habitats and increase public access will provide opportunities to enhance the character and local distinctiveness of the surrounding natural environment and bring benefits for the local community through access to and contact with nature.

| HE2- Access | | |
|------------------------|---|---|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL015; BL031; BL042 | Object to number of flats that might be accessed from Blackwell Lane. Concerned there will be too much traffic using the entrance at Blackwell Lane | BL031 - Access should be via existing hotel access only. BL042- Flats should not be concentrated in one area where high volume of vehicles will turn into one entrance (Blackwell Lane). The number of flats should be spread out with access from Carmel Road also |
| BL014 | Blackwell Lane Access very poor. Narrow and poor visibility with parked cars. | |
| BL052 | Concerns with access 4 which is opposite their property regarding existing levels of Traffic on Blackwell Lane. | Move access 4 or at least provide no access through to Grange Road. |
| BL064 | Hotel operator - Consider that access point 4 identified by the Council would adequately serve the development of HE2. | |
| BL109 | Access to the parkland along woodland path to the rear of the hotel should be maintained for tree/wildlife value and public access. | As comments |
| BL156 | Access road would need to be modified - potential that cars will use route to go from Blackwell to Grange Road | |

Officer comments

The existing access point to the rear of the hotel is the preferred option.

Any proposed access point into the site would comply with current design guidance including adequate visibility splays for the speed of the road and have been positioned accordingly.

It is likely that there will be some bollards, or similar, to prevent vehicular access between Blackwell Lane and Grange Road.

| HE2 – Highways | | |
|---------------------|--|--|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL008 | As a resident of over 15 years I use the local area roads in car and on bicycle, and pavements on foot and am very aware of the traffic flows at all times of day and night. Am well placed to provide DBC an insight into how the proposed development will affect the residents in the immediate vicinity. The updated proposal will place pressure on the existing highways infrastructure. | |
| BL008; BL049; BL71 | Bridge Road is a totally inadequate conduit between the A1 and A66 and any increase in traffic levels on this road is sheer stupidity. There are regular traffic incidents at the junction with Blackwell and as a cyclist; I will not use it for fear of my life. (2) Busy road that is a narrow entry point to the town. May mean that alteration to the nearby large roundabout would have to occur plus possible detrimental widening of Carmel Road South. | (2) Entry via Blackwell Lane onto Blackwell Grange site, Entry via the old Golf Club entrance on Blackwell Village site. |
| BL008; BL027; BL073 | Traffic build up around the Blands Corner roundabout is a common occurrence at all times of the day. Have seen a number of scary incidents in car and on bike here, often involving larger trucks. Development of any kind around this point and more traffic moving out from Blackwell Lane onto Carmel Road will add to traffic build up. | |
| BL008 | Darlington's long suffering football team are about to make a return to the area which will put extra pressure on the roads round about. Whenever an event occurs at the rugby club that its car park cannot cope with its user's park all along Grange Road down to Blands Corner roundabout. There are often near hits with people getting in and out of car and cars pulling into and out of parking spaces. If you add extra development you are asking for trouble along Blackwell Meadows if traffic handling measures are not introduced. | |
| BL008 | As a cyclist, the quality of the road surface on Grange Road, especially on the way into town, is atrocious and extra traffic will only make it worse. | |
| BL008 | Dangerous pinch point at junction of Blackwell Lane and Grange Road, traffic builds up and turning left or right at this point is always a risk - regular incidents here. Police figures are not accurate as some incidents go unreported. Increase in road users will increase risk and it is only a matter of time before something serious happens. A lot of road users on Grange Road do not adhere to speed limits | |
| BL012; BL027 | What is the parking solution to serve hotel and new development?; Some concern about relocated car parking from the wall garden to allow development in HE2, how can this be achieved in the parkland | |
| BL015; BL034; BL044 | Concerns relating to traffic congestion | The area should be left clear |
| BL015 | Speed bumps needed on Blackwell Lane | |

| HE2 – Highways | | |
|-----------------------|--|---|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL052 | If connected through it could be used as a cut through to Grange Road. | Move access 4 or at least provide no access through to Grange Road. |
| BL071 | Flats are aimed at couples who will have a car each, meaning cars into three figures just for them. | |
| BL071 | We will need extensive traffic lights, pelican crossings and traffic calming measures to secure residents and child safety. | |
| BL071 | The flats should be moved closer to the entrance on Grange Road where you have good safe access to high density living such as flats. | |
| BL149 | Blackwell Lane already a rat-run known to the police. Additional development will make this worse. | |
| BL160 | Major concerns remain (safety and noise) in terms of revised 'preferred access points' in development. Proposed access points four and five are located on or just before / after bends on Blackwell Lane which, when taking into account the current speed and level of traffic on the road (as a cut through from Grange Road especially in the peak times / school run) is of great concern (and seemingly poor planning). I missed any mention of any proposed traffic calming measures though a greater number of dwellings on all sites will mean greater traffic onto Blackwell Lane. If this goes ahead, an access point with a roundabout at the junction of Hartford Road and Blackwell Lane seems more appropriate. | Removal of proposed access points four and five as they are located on or just before / after bends on Blackwell Lane which, when taking into account the current speed and level of traffic on the road (as a cut through from Grange Road especially in peak times / school run) is of great concern. Addition of access point onto Grange Road - the largest access point to the hotel. Inclusion of traffic calming measures. |
| BL160 | There is poor public transport and social infrastructure on all proposed sites. Blackwell Lane is not a bus route, there are no doctor surgeries, pharmacies, and cafes - the types of services older and typically less mobile people will want to use. I also fail to see how the targeted demographic for these apartments will walk across the parkland, past the hotel, etc. to get to a bus stop. It is not feasible to assume that this demographic will either own or be able to drive a car. The site is just as unfeasible as the Council believed Stressholme to be for development. | |
| BL064 | Hotel operator - site is close to local services and local public transport | |

Officer comments

A Transport Assessment is currently being produced in consultation with Highways England that will demonstrate the impact of the proposals on the local and strategic highway and this will help to inform the density of building on site. As part of the assessment accident statistics are reviewed and taken into consideration. This will also include a Travel plan that will assess the needs of non-motorised users. Bridge Road and the A66 is owned and maintained by Highways England. There are proposals to improve Bland Corner roundabout which Highways England are reviewing. Off site highway improvements to mitigate the development traffic would be highlighted as required within the Transport Assessment. This Transport Assessment will include consideration of the impact on the local highway network based on assumptions of movements associated with the proposed move of Darlington Football Club to Blackwell Meadows.

HE2 – Amenity and Open Space

| Consultee Ref | Summary of Comments | Change Proposed (if any) |
|----------------------|---|---|
| BL042; BL071 | Our bungalow on Draycote Crescent has benefit of being very quiet - concerned volume of traffic associated with the new flats will change this. | |
| BL043 | Concern over height of flats. | Height of proposed flats behind Blackwell Lane should be 2 storey maximum |
| BL013; BL149 | Flats will look directly into our property and we would lose our view. | Withdraw the application or come up with more sympathetic proposals. |
| BL034 | Concern regarding loss of green outlook and loss of natural space | |
| BL052 | Green space in and around residential areas should be retained for the wellbeing of the people living in the area. | Lowest density housing possible should be provided. |
| BL064 | Hotel operator - development of HE2 on amenity would be limited due to screening, use of existing accesses and the 'extra care' proposal being a low traffic generator. | |
| BL071 | Flats between HE1 and HE2 should be moved further away from the lane and ideally be replaced with bungalows as there is a shortage of them in the area. | |

Officer comments

Although the proposal would involve loss of some open space, the majority is retained, and would result in improvements to the remainder of the open space.

Impact on a person's view is not a planning matter, though impact on an individual's amenity and the amenity of an area is. The residential amenity of existing and future residents will be considered as part of any detailed design and layout, at the planning application stage. This will include details of heights and precise locations of dwellings.

Any impact of the proposed development in relation to potential additional noise will be considered at planning application stage. It is unlikely that there would be a significant change in traffic noise than that already experienced on surrounding roads.

HE2 – Flooding and Drainage

| Summary of Comments | Change Proposed (if any) | Change Proposed (if any) |
|---------------------|--|-------------------------------------|
| BL064 | Hotel operator - note that the site is at low risk of flooding | |
| BL149 | My house and that of my neighbour (on Upsall Drive) suffer from flooding whenever the ex-golf course land is saturated. Reducing land to absorb water will only increase risk and frequency of flooding. | Remove development from He1 and He2 |

Officer comments

Environment Agency information shows that there is no flood risk affecting any of the development sites. However, there is some land that experiences surface water drainage problems. This is not a constraint to development, as maintaining green field rates of surface water runoff would be conditioned through the planning process. There is also a strong probability that the residential development would actually resolve the drainage problems as this would affect the saleability of the new house.

The Drainage Study demonstrates that there are several drainage solutions, including the opportunity to incorporate a sustainable drainage scheme (SuDS) within the remaining parkland; the latter would have the added benefit of providing additional habitat for the great crested newts and other species. Therefore, drainage is not an insurmountable problem and could actually be improved for existing residents through the new development.

Appendix 11

Draft Darlington Local Plan 2016-2036 (June 2018) - Appendix B Extract

B HOUSING ALLOCATION STATEMENTS

- h. There has been recent record of Great Crested Newts on the site. An ecological survey should support a planning application.
- i. Public rights of way cross the site in a number of areas. These should be accommodated in site layout.

Site 392 - Elm Tree Farm

The site is within the Skerningham Masterplan area which is a strategic extension to the north east of the main urban area. The site is to the north of Sparrow Hall Drive. It is a greenfield site which is largely in agricultural use and is proposed for allocation for residential development with an indicative yield of 150 dwellings.

Issues and requirements

- a. Vehicle access is to be taken from Sparrow Hall Drive.
- b. Older farm buildings should be retained and converted where possible.
- c. A historic track crosses the site. This should be protected and accommodated in an appropriate site layout.
- d. The site is within an area of high landscape sensitivity, a development scheme will require suitable mitigation in terms of design and layout.
- e. Old farm buildings on site could contain biodiversity interest. An ecological survey may be required to support a planning application.

Urban Area

Site 1 - Alderman Leach

The site is within the main urban area of the borough, to the north west and is located to the north of School Street. It is an area of open space (disused playing field) which was not developed as part of a wider residential scheme. The planning permission was for flats but were not delivered and are not expected to come forward. The site is proposed for allocation for residential development with an indicative yield of 12 dwellings.

Issues and requirements

- a. A TPO tree is present adjacent to the southwest corner of the site and should be protected.

Site 9 - Blackwell Grange East

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 north west of Grange Road. It is part of the grounds of Blackwell Grange Hotel which is located to the east. The site is proposed for allocation for residential development with an indicative yield of 43 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 setting of the Grade II listed Blackwell Grange and its parkland curtilage. Significant mitigation and public benefit are required to offset the harm caused. There is the potential to better reveal the approach to Blackwell Grange along the historic drive from Grange Road.

HOUSING ALLOCATION STATEMENTS B

- b. A development scheme would need to restore the remaining parkland area to the Grade II Listed Building
- c. The southern half of the site is designated as a Local Wildlife site and any development should provide mitigation. Habitat improvements required throughout the site and on the parkland area to the south of former Mill Lane.
- d. There are a number of TPO trees/groups on the site that form a continuous strong tree belt along its northern boundar, to the north of the drive and across the centre of the site. The trees should be retained and maintained.
- e. 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.

Site 11 - Cattle Mart

This brownfield site is currently in use as a cattle and auction mart and is located to the south west of the town centre. Although not currently available there is the intention for the relocation of the mart in the near future from the town centre area to a site at Humbleton Farm adjacent to the A68. The current mart site is proposed for allocation for residential development with an indicative yield of 76 dwellings.

Issues and requirements

- a. The East Coast mainline and Bank Top Station lie to the east of the site; appropriate mitigation should be provided.
- b. The site will likely have some contamination that should be remediated as part of a development scheme.
- c. Numerous TPO trees are present along the sites northern boundary. Development need not impact on the trees and could result in new planting.
- d. The Grade II* listed Bank Top Station is located adjacent to the site. Development of the site will need to enhance the setting of the listed building and also reflect railway terraced development which is prevalent in the area.
- e. There is the potential for bats to be present in the existing buildings on site.

Site 51 - Mowden Hall

This is a largely brownfield site located in the western part of the main urban area of the borough to the south of Staindrop Road. There was previously an office development on the site which has now been cleared and Mowden Hall is located to the south of the site. It is proposed for allocation for residential development with an indicative yield of 35 dwellings.

Issues and requirements:

- a. Grade II Listed Building Mowden Hall is located to the south of the site. The setting of the building should be respected by any development scheme. Proposals should be low density, high quality and set back from the listed building retaining existing historic grounds.

Appendix 12

Draft Darlington Local Plan 2016-2036 (June 2018) – Consultation Comments – English Heritage

Darlington Borough Draft Local Plan June 2018

| | |
|--|---|
| Event Name | Darlington Borough Draft Local Plan June 2018 |
| Comment by | Historic England (Ms Emily Hrycan - 1176214) |
| Comment ID | DBDLP1105 |
| Response Date | 30/07/18 12:24 |
| Consultation Point | Policy H 2 Housing Allocations (View) |
| Status | Processed |
| Submission Type | Email |
| Version | 0.21 |
| Nature of response | |
| Do you agree with this content? | Object |

Please tell us why

There does not appear to be any robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites (included those that are safeguarded) for development. The SA does not provide any evidence to determine whether the sites can accommodate the quantum of development without harm to the historic environment. Some parts of the SA suggest mitigation measures without any evidence to support their inclusion, whilst others defer all matters to be dealt with at planning application stage. As a result the site specific policies do not provide any mitigation measures to inform development proposals that may come forward for the sites.

In order to ensure that the Plan is sound, there is a need to consider the impact of site allocations on heritage assets and their setting in the site allocation process as part of your Plan. Historic England has produced an advice note which provides further information and best practice; Historic Environment and Site Allocations in Local Plans

(<https://historicengland.org.uk/imagesbooks/publications/historic-environment-and-site-allocations-inlocal-plans/>) which may be useful in the production of your Plan.

The NPPF makes it clear that the significance of heritage assets can be harmed through development within their setting. There is a requirement in the Town and Country Planning Act 1990 that 'special regard' should be had to the desirability of preserving listed buildings, their setting or any features of special architectural or historic interest which they possess. It is also the duty of the Council to preserve or enhance the character or appearance of its conservation areas and their setting. Where potential development sites appear to include non-designated assets including the possibility for archaeology, their potential should be investigated and retention/exploration should be promoted.

Consequently, before allocating any site there would need to be some evaluation of the impact, which the development might have upon those elements that contribute to the significance of a heritage asset including their setting, through undertaking a heritage impact assessment. The assessment of the sites needs to address the central issue of whether or not the principle of development and loss of any open space is acceptable. It needs to evaluate:- What contribution the site in its current form makes to those elements which contribute to the significance of the heritage assets. For a number of these heritage assets, it might be the case that the site makes very little or no contribution.- What impact the loss of the area and its

subsequent development might have upon those elements which contribute to the significance of those heritage assets. If it is likely to result in harm, how might that harm be removed or reduced to an acceptable level. If the harm cannot be reduced or removed, what are the public benefits that outweigh the presumption in favour of the conservation of the heritage asset?

The selection of sites for development needs to be informed by an up-to-date evidence base and the Plan should avoid allocating those sites which are likely to result in harm to the significance of the heritage assets of the Plan area. Where adverse impacts are unavoidable, the Plan should consider how any harm might be mitigated. This could include measures such as a reduction of the quantum of development at a site, amending the types of development proposed or locating the development within another part of the site allocation. Such initiatives need to be fully justified and evidenced to ensure that such measures are successful in reducing identified harm.

The allocation of sites for development may also present better opportunities for the historic environment. For example, new development may better reveal the significance of heritage assets or may provide an opportunity to tackle heritage at risk. Where relevant, policies for allocated sites may need to make reference to identified historic environment attributes in order to guide how development should be delivered. For example, this might require the policy to include detailed criteria or providing supplementary information with the supporting text.

Historic England strongly advises that you engage conservation, archaeology and urban design colleagues to ensure that you are aware of all the relevant features of the historic environment and that the historic environment is effectively and efficiently considered in the allocation of any site and in the preparation of the SEA. They are also best placed to advise on local historic environment issues and priorities, including access to data held in the HER. This will ensure that there is joined up and robust approach is undertaken to historic environment issues. Therefore, in view of the tests in the NPPF, the Council will need to demonstrate that the sites can be developed and that the housing numbers can be achieved without harm to the historic environment. At present the Plan and the evidence base does not demonstrate this.

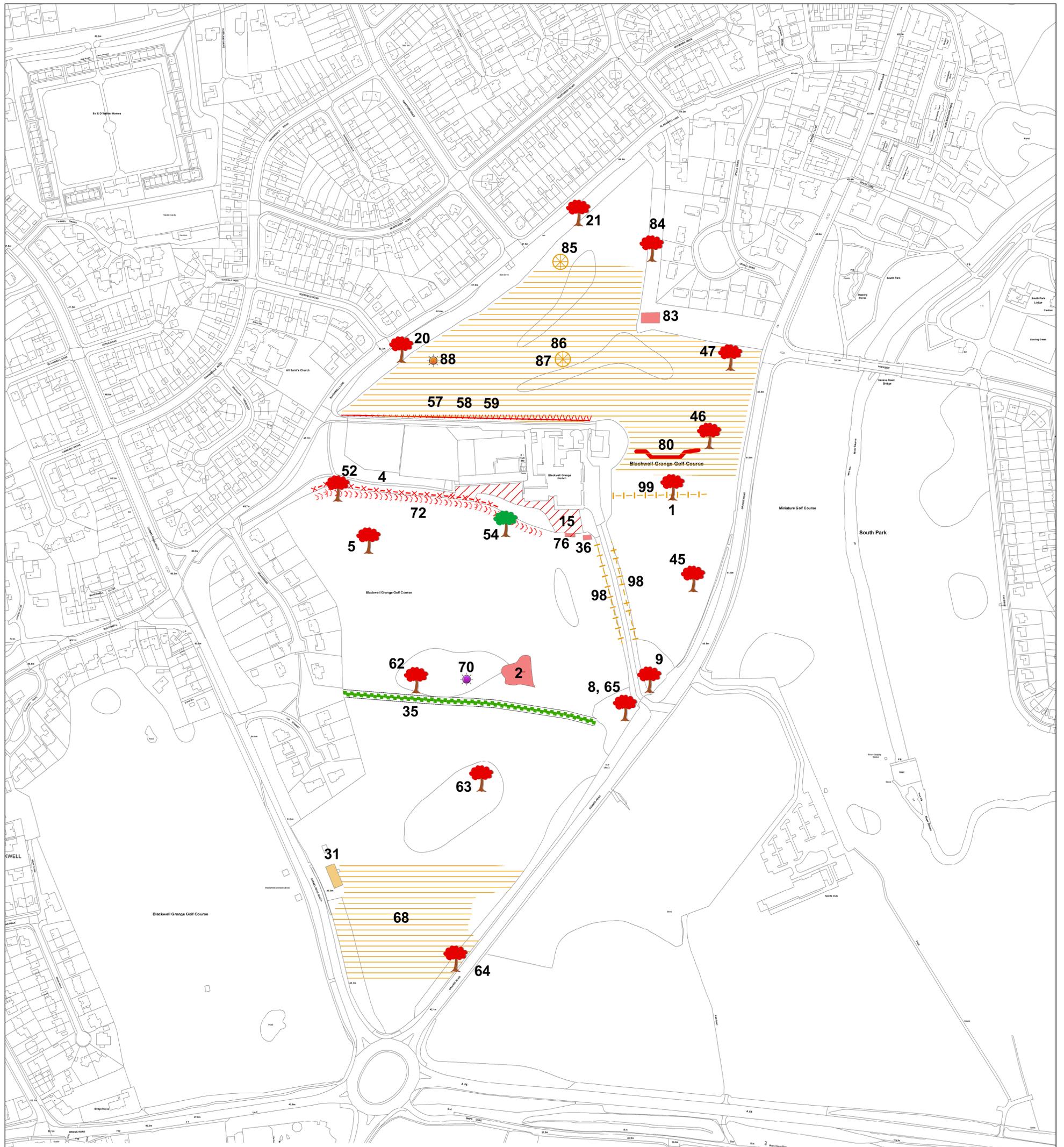
In view of this, Historic England is unable to support the proposed housing site allocations contained in this Policy H2.

Suggested amendments

The Plan and the supporting evidence base including the SA should be amended to ensure that it includes a robust assessment of the historic environment, heritage assets and their setting to inform the suitability of the sites for development and to ensure that there are appropriate site specific mitigation measures which will minimise harm to the historic environment in line with the requirements of the NPPF and the 1990 Act.

Appendix 13

Features of Significance Map – Blackwell Grange



| Ref | Brief Description | Significance Type | Significance Level |
|-------|--|--------------------------------|--------------------|
| 1 | Lime Avenue present before 1790 and referred to in 19th c accounts as 'ancient' | Architectural | Considerable |
| 2 | Fish pond shown on survey of pre 1790 & so part of earlier design to go with 1710 house. Still extant | Architectural | Considerable |
| 5 | Tree Clump | Architectural | Considerable |
| 8, 65 | Tree Clump to frame entrance | Architectural | Considerable |
| 9 | Tree Clump to frame entrance | Architectural | Considerable |
| 20 | Pleasure Walk | Architectural | Considerable |
| 21 | Pleasure Walk | Architectural | Considerable |
| 31 | Stone building used as animal shed with typical sloping floors for drainage along bays facing length of wall | Architectural | Some |
| 35 | Mill Lane (centre of) | Archaeological | Limited |
| 4 | Sunken fence | Architectural | Considerable |
| 36 | Air raid shelter built in 1939 and still extant | Archaeological | Considerable |
| 45 | Shelter planting to drive proposed in 1802 | Architectural | Considerable |
| 46 | Shelter planting to drive proposed in 1802 | Architectural | Considerable |
| 47 | Shelter planting to drive proposed in 1802 | Architectural | Considerable |
| 54 | Tree avenue or orchard in 1790 | Architectural | Limited |
| 57 | Hedgerow or tree lined field boundary in 1790 | Architectural | Considerable |
| 62 | Tree grouping of Oak, sycamore and lime on 1790 survey and extant | Architectural | Considerable |
| 63 | Tree grouping of sycamore and lime on 1st edition map 1860 and extant | Architectural | Considerable |
| 64 | Isolated tree plus two younger limes | Architectural | Considerable |
| 68 | Ridge and furrow | Archaeological | Some |
| 70 | Earthwork mound possibly a viewing mound or old tree | Archaeological | Unknown |
| 72 | Watercourse with low brick wall (sunken fence) adjacent | Architectural | Considerable |
| 76 | 18th century garden steps in brick with stone steps and finials | Architectural | Considerable |
| 80 | 18th century culvert in brick, partially collapsed | Archaeological | Considerable |
| 83 | 18th century ice house with north facing entrance; ice house collapsed | Architectural & Archaeological | Considerable |
| 84 | 3 limes forming avenue shown on 1802 survey | Architectural | Considerable |
| 87 | Views of St Cuthbert's Church possible from here | Artistic | Some |
| 88 | Headland or Holloway earthwork heading towards Blackwell Lane | Archaeological | Some |
| 86 | Ridge and furrow | Archaeological | Some |
| 85 | Views of Cleveland hills possible here; views referred to in 19th century accounts And directories | Artistic | Some |
| 15 | Lawns around house | Architectural | Considerable |
| 52 | Tree clump present in 1790 | Architectural | Considerable |
| 58 | Hedgerow or tree lined field boundary in 1790 | Architectural | Considerable |
| 59 | Hedgerow or tree lined field boundary in 1790 | Architectural | Considerable |
| 98 | Metal estate rail fencing with acorn topped finials, probably 19th century | Architectural | Some |
| 99 | Metal estate rail fencing with acorn topped finials, probably 19th century | Architectural | Some |



Appendix 14

Draft Darlington Local Plan 2016-2036 (June 2018) – Consultation Comments and Official Reponse

General Comments – Referring to more than one site or the proposals as a whole

| General – General and master plan | | |
|--|---|---|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| BL113 | A specific parkland restoration plan should be put in place. | |
| BL049 | Concern that public land owned by DBC may be managed by a private company paid for by the people buying property. They may have undue influence on the future development of this land that may not be in long term interest. | For this land to be kept in perpetuity for the people of Darlington and managed as park land by the Council |
| BL155 | Would be sad if parkland was destroyed as understand it was designated for community use. | |
| BL004; BL014; BL046 | Not what was originally proposed. Who initiated and are developers involved? Why have proposals changed so much since last consultation? | BL014 - Stick with original idea of exec houses. |
| BL006; | A premium price should be sought from builders for such executive housing that will bring good value for money for Darlington rate payers, such housing would further enhance this part of Darlington as a desirable residential location; If development to take place, this area should be allocated as exemplar area for attracting executives to the area, not a place for high density apartments and general housing. | |
| BL008 | Any development will have an impact on the existing neighbourhood and while I have no objection in principle, I would like to make certain that the Council have taken into account the wider 'knock on' effects of increasing population levels in this area. | |
| BL154; BL157 | Open space and green belts are Darlington's special characteristics - Blackwell Grange and its Parkland make a significant contribution to this. Land was sold to the Darlington Corporation- were there any covenants associated with this sale? | |
| BL008; | Council's attempts to increase housing density were inevitable from the outset - the initial proposals were designed to be maximum acceptability to residents as a 'foot in the door' and I expect another attempt to build further at this location at some stage. Perhaps the Council would be willing to provide a covenant on the remaining undeveloped land? | |
| BL019; BL134 | Fully support the Council's proposals and commend the work and consultation undertaken. | |
| BL036 | Supportive of housing in principle - most local residents live on land that was previously of historic interest. | |

| General – General and master plan | | |
|--|--|--|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| BL009; BL054; BL050; BL065; BL163; BL165 | Please could you give evidence of this need for housing? Why apartments? Where is evidence of demand for them; housing is only being proposed here to plug holes in council finances. | |
| BL029 | In favour of development needed in the west end however bungalows needed. | |
| BL021; BL054 | Use of greenfield land rather than brownfield land is always a concern. | Use more brownfield sites |
| BL014; BL102; BL152; BL021; BL046; BL077; BL104; BL112; BL142; BL143; BL172 | No amenities in the area, Schools, shops etc. Existing provision insufficient; Additional pressures on already oversubscribed senior schools. Using the car to access facilities is not the way forward. | |
| BL054 | Precious little Industry left in Darlington so houses may be sold to 'incomers' who work elsewhere. | |
| BL160 | Will play little part in attracting business to the area. | |
| BL054 | What about the Hotel? The operators can hardly welcome these proposed developments. It will devalue the hotel property. Much of its promotional literature focuses on its parkland setting. | |
| BL054 | As a result of numerous impacts high council tax rate should be reduced accordingly. | |
| BL050 | The Council state they have been in contact with Historic England, Natural England and Highways England. Please provide the data or correspondence which substantiates their support and acceptance of your proposals and details of the cost of each study undertaken. | Only development with properties similar to those already in existence would be fair and acceptable. |
| BL095 | Require that a local developer is chosen so that people in the town have jobs. | |
| BL069 | Given the amount of new housing already provided in the town, I am not convinced that there is a need for even more housing. | |
| BL075 | Commercial development is not concerned with preserving an attractive area for future generations but in making use of an asset for increased profit, the result is the very destruction which makes Blackwell unique. Deleterious effect on the overall image of Darlington as a place to invest in, visit, relocate to or reside in. | |
| BL092 | Clear that the change of house types is driven by the aim to achieve maximum council tax from residents. | |
| BL0091 | Development could support the River Tees Rediscovered project led by the River Tees Rediscovered Landscape Partnership, seeking to reconnect with people with the river. Highlight the importance of the waterway as a national feature which has had a key role in moulding the physical and cultural development of the area (EA). | |

| General – General and master plan | | |
|--|---|--|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| BL083 | Other assets could be sold to reduce the Council debt. | |
| BL112 | The development must be contrary to relevant Council planning policy. | |
| BL118 | Ponds - health and safety issue for families with small children. | Fewer sites would be preferable |
| BL133; BL174 | Would prefer land to remain Parkland but acknowledge need for housing. | |
| BL012 | General support for the proposals to restore the parkland. | |
| BL145 | There are existing buildings (former Green keepers compound) on land to the south east of the Spinney with vehicular access of Carmel Road South and it may be possible to designate this land as suitable for low density (fewer than 6 per hectare) mews type housing development, for this would make attractive use of a brownfield site in poor repair that is not well occupied by the Council. | |
| BL160 | Disappointing to note that Council responses to residents initial major concerns were facile counter arguments. For example, in response to resident's school place concerns, it was intimated that families who may live in executive housing would more over consider boarding / private school options. A real championing of the Council-run state school experience there. | |
| BL162 | Unexplained massive expansion of development plans in areas where no development should be pursued. | |
| BL162 | This heritage asset not the right location for development and DBC clearly demonstrating that they are not sufficiently independent or concerned about the heritage of Darlington to manage the associated consultations. | |
| BL095 | Support application to build houses, with conditions that we keep as much of the parkland as possible so that the area maintains its historic character. | |
| BL110ii | Development out of character for the area and will have a detrimental effect. Apartments not selling elsewhere in Darlington. | |
| BL118 | Footpaths should provide access for non-residents. | |
| BL124v | Will change the character of the area to be like a large housing community, not a town dwelling with an open space feel. | Whole development needs to be rethought to fit with existing housing |
| BL151 | Concern that the previous elegant plan has now doubled in numbers and seeks reassurance that it will not increase further. | |
| BL166; BL169 | If site is built on, should be the highest quality, executive, low density housing to attract high quality professionals who would otherwise be lost to other areas. | |

| General – General and master plan | | |
|--|--|--------------------------------------|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| BL013 | Land on Grange Road should be developed instead. | |
| BL162 | Request that the current consultation process be halted and no further action taken until an appropriate independent external arbitrator is involved to review the conduct of this project; DBC ignoring expert independent recommendations. | |
| BL166; BL169 | Would have preferred housing to have been on the Stress Holme Golf Course site - Blackwell must be the most picturesque housing site for miles around. | |
| BL050 | Utilities - This is irrelevant to the consultation process, this only helps the developer. Why was tax payers' money spent on this? | |
| BL133 | If there is to be housing it preferably should be low density, low lying, and high quality executive housing. | |
| BL012 | Has to be some agreement that some (hopefully a lot) of the parkland is ring-fenced and protected from development, not just now but long term. Important part of the project in order to maintain trust and goodwill of local people. | |
| BL006; BL014; BL143; BL044 | High Density housing not appropriate. Urge Council to go ahead with as low a density as possible and to retain as much of the existing open park land as possible. | |
| BL076 | Mix of top end housing and apartments would be acceptable so long as nothing is above three storeys in height. | |
| BL167 | Parkland should be protected for future generations to enjoy. | |
| BL082 | There is now the possibility of far more houses than at first suggested and apartments have also been suggested. | |

Officer comments

The Core Strategy sets out how the borough will help meet a small sub-regional need for small numbers of top-end executive housing, to support economic growth in the borough and wider Tees Valley area, which could reduce in-commuting.

The proposals have been informed by the comments received from statutory consultees, who accept the development of housing in this area in principle. All responses, including those from residents and statutory consultees are available on the DBC website at www.darlington.gov.uk/planning.

Darlington has an aging population and the Council's Supported Housing Strategy Appendix 2 calculates that by 2025 there will be a requirement for an additional 163 Extra Care for sale units and an additional 981 Sheltered for sale units for people aged over 75. These figures do not include the needs of people below the age of 75. The clear message is there is a shortage of choice for people who want to purchase specialist elderly accommodation. This is also identified in the adopted Core Strategy.

The importance of having local aspirational housing that is attractive to the creative, skilled, entrepreneurial and managerial people who drive the local economy is widely acknowledged in work done for the Tees Valley and Darlington (Tees Valley Economic Regeneration Statement of Ambition, 2010; Tees Valley Sub-Regional Housing Strategy, 2006; and Darlington Strategic Housing Market Assessment, 2012). A connection has been made between the purchasers of executive homes and the creation of

| General – General and master plan | | |
|--|---|--------------------------------------|
| Consultee Ref | Summary of Comments | Respondents suggested changes |
| | <p>jobs (Tees Valley Strategic Housing Market Assessment and Local Housing Assessment Update, 2009) and its role in helping to achieve regeneration targets. The various studies that have been undertaken were to provide as much information as possible on the site, and the surrounding area, and to inform the development of the masterplan. Spending data is available on the DBC website at http://www.darlington.gov.uk/your-council/council-information/financial-information/spending-data.aspx.</p> <p>Developing nearer to Grange Road is more sensitive from a Listed Building perspective because it includes both the original and the later access to the building and impacts on views of the primary, front, elevation. In terms of impact on the former parkland, the Blackwell Lane side of the site has already seen housing development in the form of Grangeside and The Spinney. Historic England have advised there is only so far east new development could extend on the site before substantial harm (as identified in paragraph 133 of the National Planning Policy Framework) would occur. Housing on this part of the site was ruled out early on for this reason. Contributions to support additional school places would be required as part of a legal agreement between the developer and the Council as part of the planning application process.</p> <p>A Parkland Restoration Plan would form part of any planning application.</p> <p>Footpath (and cycle) connectivity to existing residential developments is a key requirement of any new development. Further detail of how this would be achieved would be considered at detailed application stage. Details of heights and precise locations of dwellings would also only be clarified at this stage.</p> <p>Restoration and retention of the remaining Parkland is an important element of the development proposals.</p> <p>All comments received from residents will be considered as part of the decision-making process.</p> | |

| General - Heritage | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL009; BL077; BL078; BL103; BL135; BL145; BL150; BL170 | Why are you proposing so many houses on a historic heritage site; Concern about impact on heritage assets. | BL078- the historic park should not be built on. |
| BL009; BL080; BL112; BL113; BL114; BL115; BL14; BL142; BL143; BL145; BL149; BL150; BL173 | Why have you totally disregarded the Archaeo report commissioned by Council which says zones 2&3 are sensitive areas to change and NO development should be pursued? Blackwell Grange and surrounding parkland a rare and beautiful historical survival from the 18th century with many interesting features which make it well worth preserving as identified in the survey. | BL009; BL113; BL114 -No development should take place. BL114 - Particularly in zone 3. BL115 - Should be designated as parkland |
| BL041, BL086, BL089; BL145 | Object to destruction of historic golf course. | |

| General - Heritage | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL009 | Council should follow the recommendations set out in the 2012 Statement of Significance and pursue positive and protective courses of action which seeks designation of the park as a historic landscape, requests funding from Heritage Lottery Fund to perform necessary conservation and restoration work and extends the centre of Darlington Conservation area to include this valuable historic resource. | |
| BL050 | Within Zone 1 of Statement of significance, it states there is scope for high quality, low lying development outside the main designated area of parkland which retains pleasure walks to the perimeter, away from traffic and sustains the existing leafy character of Blackwell. Can you confirm that zone one achieves this? Can you confirm zone two is proposed for low density housing / small business or additional hotel accommodation within the walled garden which references garden hot house architecture? Can you confirm that zone 3 will be developed upon and goes against the report commissioned by the Council? Please send a plan illustrating every property with the number of storeys and their exact location in all of the zones confirming that the criteria in the Statement of Significance will be met. If not, why is this? | |
| BL050; BL114 | Has the Council pursued lottery funding? Is there any evidence of this? | |
| BL065 | Concern regarding loss of ridge and furrow, views of Cleveland Hills and the need to follow English Heritage's initial advice. | Retain the ridge and furrow |
| BL080; BL0092; BL111 | Parkland should be formally designated. Medieval strip system of agriculture and should have full geophysical survey undertaken. | |
| BL145 | No evidence that English Heritage consulted. Instead I am informed that the Planning Adviser at the Newcastle Office may have been consulted informally about development but not safeguarding it. Despite requests from numerous attendees no evidence of this exchange has been provided, possibly because there is none. Certainly that department was not informed about the proposed density of properties presented at the consultation event. Contrary to para 132 of NPPF, no evidence that DBC has demonstrated 'clear and convincing justification'. | |
| BL145 | NPPF requires a higher standard of design where it affects the setting of a Listed Building. Council under a legal duty to have particular regard to the desirability of preserving or enhancing the character and appearance of a listed site of significance, so as drawn the proposal is unacceptable for it is inconsistent with the character of existing housing and the obligation not to have an adverse visual impact appears to have been disregarded. | |

| General - Heritage | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL145 | There should be no vehicular access onto the parkland between Grangeside and the Spinney, or from the access road to the hotel off Blackwell lane, as that would be contrary to recommendations of Archaeo-Environment and would endanger the historic Mill Lane and the historic brickwork and paving that is evident there. No evidence as to the feasibility of access was presented at consultation event. | Should not be permitted. Instead, pedestrian access onto the historic Mill Lane should be restored so that the people of Darlington may enjoy the historic parkland. |
| BL145 | The parkland and pleasure walk should be transferred to the Community Land Trust, together with an endowed fund that may be pooled with other investments to provide an income that will fund the cost of maintenance by volunteers. As a charity, the CLT can apply for funds from grant making trusts that are not available to the Council to further enhance the parkland. | |
| BL150 | The historic heritage parkland was gifted to the town for all to enjoy. | |
| BL162 | Irresponsible approach to heritage and environment by a publicly accountable body is a matter of significant public concern. Scoring system used to select the parklands for development is flawed. Status of the Grade 2 * listed perimeter wall under threat. | |

Officer comments

The former parkland, has since 1971 until relatively recently been in use as a golf course. The parkland does not meet Historic England's criteria to be registered as an Historic Park and Garden as a result of the changes that have taken place on the site over the years. There are plans to enhance the former parkland and create a local nature reserve, funded by development on the site.

The Statement of Significance (produced by Archaeo-Environment for the Council) has not been disregarded, but Historic England has provided us with different advice about the development potential of the site. It is not uncommon for professionals to have different opinions on subjective matters, based on interpretation of legislation and policy.

The wall is curtilage Listed so alterations or any loss require prior Listed Building Consent. The wall will remain for the most part with the minimum number of accesses created. Historic England also advised that the boundary between housing and parkland is an important consideration and recommend that a softer transition between private garden and open parkland could markedly improve the quality of both and add to the marketability of the houses.

The site is part of the setting of the Grade II* Listed Building, however this does not mean that no change or even no harmful change can take place. Paragraph 134 of the National Planning Policy Framework allows for less than substantial harm, providing there are public benefits. We have received advice from Historic England that the allocation of the site for relatively low density, top-end executive housing would constitute less than substantial harm. Impact upon the listed building has been assessed and has been guided by advice from Historic England. Their advice gave us a steer that the site has some more development potential than the Archaeo-Environment Report of 2012 advises. Historic England will also advise on any future planning applications for development on the site. Historic England (formerly English Heritage) has been consulted and their response can be viewed online at www.darlington.gov.uk/darlington (Ref No. BL79).

Alternative sources of funding such as Heritage Lottery Fund have been investigated. However, either the parkland fails to meet the criteria for funding and/or the funding organisation requires a 5% contribution for schemes below £1 million or 10% for schemes above £1 million. In addition, revenue funding is time limited after which the scheme is required to be self-financing. Therefore, at present, the proposed residential development plus the levy from new residents is the only mechanism to guarantee

| General - Heritage | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| | <p>funding for the restoration and enhancement of the remaining parkland, the creation of new wildlife habitats and increased public access. This is the best way, at the moment, of ensuring that the remaining parkland is enjoyed by future generations. However, if new opportunities emerge, alternative ways of funding the restoration and enhancement of the parkland should be considered, particularly to support ongoing maintenance and management that may otherwise fall short of target revenues if development does not progress as quickly or in the amounts being planned for.</p> <p>It is acknowledged that the Blackwell area of Darlington has some historic and traditional buildings and is made up of high quality suburbs. Any new development on the Blackwell Grange site should to be guided by the Planning and Design Guidelines which will be prepared if the sites are allocated for development.</p> <p>We have assessed allocating the site for housing development against local and national planning policy and have sought advice from Historic England. They allow for some harm to the settings of Listed Buildings, providing there is enhancement or public benefits, which in this case will involve restoration of the former parkland, creation on new wildlife habitats and increased public access.</p> <p>A Parkland Restoration Plan would form part of any planning application.</p> <p>In relation to evidence of ridge and furrow we will follow Historic England's advice.</p> <p>Detail of the number of storeys and exact location and precise number of properties will be decided at planning application stage, not the site allocation stage we are at now. Residents would have further opportunity to influence more specific detailed elements of a scheme at that stage.</p> <p>A Statement of Significance provides advice about the importance of the site or building rather than prescriptive solutions for that site or building.</p> <p>We have seen no evidence that the former parkland was gifted to the town. There are no covenants preventing residential development and the proposals for the remaining parkland will allow access to the general public rather than just to golf club members.</p> <p>The scoring system used was revisited and, although there is disagreement over some of the results, there was one factual error which has since been rectified. However, this has not altered the overall conclusions that Blackwell is the most sustainable and appropriate location for top-end executive housing.</p> <p>The listed perimeter wall is not under threat from the proposed development as the preferred access is via an existing access to the rear of the Hotel.</p> | |

| General - Trees | | |
|------------------------|--|---------------------------------|
| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL137 | Should retain as many trees, vegetation and ponds as possible. | |
| BL057 | Should restore the Lime Tree Avenue. | |

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| BL054; BL050; BL061; BL077; BL078; BL086; BL102; BL112; BL113; BL125ii; BL127ii; BL101xii; BL096iv; BL144; BL147; BL170; BL173 | Strong views that trees should be protected; It is not clear how many of the trees will be destroyed - even if they are not felled others might suffer and die if their immediate environment is disturbed. Role of trees is important in this area, visual amenity, wildlife habitats, shade, etc. Unclear how many trees will be affected by the development, how TPO's have been taken into account in the site layout, have we looked at tree retention and new planting? What are the distances from the housing plots to the nearest TPO? How many trees are being removed and is there a detailed report detailing all of the trees? What are tree protection measures? | Full details of TPOs and proposed tree removal required |
| BL050 | Tree Survey already carried out as part of Statement of Significance. The findings are clear, why was this carried out again? | |
| BL076 | Relieved to see Grade A trees safeguarded. Others should be retained to enhance the parkland aspect. | |
| BL082; BL084 | There should be no building whatsoever on the historic parkland because of detrimental impact on ancient trees. Currently Carmel Road South is a lovely corridor of trees - what would it be like with housing either side or access roads with their obvious dangers? | |
| BL110ii | Removal of ancient woodland would have a detrimental effect. | |
| BL118 | As many trees as possible should be preserved. | |
| BL151 | Trees and hedge lines should be preserved to mask development - will require close scrutiny if the number of dwellings increase. | |
| BL173 | Damage will be done to the wonderful variety of plant life found in the parkland. The whole area will be ruined forever. | |
| <p>Officer comments</p> <p>It is recognised that the existing trees are a very important element of the area and the vast majority will be retained. Any planning application for residential development will be assessed on that basis, together with all other planning considerations. The majority of the protected trees are located on the borders of the parkland and these will remain. However Tree Preservation Orders are not intended to prevent felling forever. There are circumstances where felling a protected tree is acceptable, e.g. dead or dying trees in danger or falling down. However any planning permission given would override any existing TPO's if their retention was incompatible with the permission granted. The TPO legislation does not limit planning, but is considered in detail when looking any planning applications – and if removal of a tree is considered acceptable in the balance of the situation, authorisation can be given. However, there are a great many trees within the site that will not be subject to TPO's but are still high value trees. When assessing the trees generally on site, extra consideration is not given to TPO'd trees per se, but every tree is assessed with regards its retention value both presently and in the future within a potentially different surrounding. Every tree from 6cm stem diameter and up is considered as a material consideration and all trees retained must be offered the same minimum protection as recommended by the British Standards. The number of trees to be felled would be kept to a minimum and remaining trees, including their root systems, will be protected during construction. It is illegal to cut down, top, lop, uproot, cut roots, wilfully damage or wilfully destroy a protected tree without the Local Planning Authority's written consent.</p> | | |

The tree survey carried out as part of the Statement of Significance was in relation to the original designs for the historical parkland not in relation to the health, quality and condition of the trees, nor was it comprehensive.

Most of the proposed development is on short cut grass formerly part of the golf course which has very little plant life value.

| General - Wildlife | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL054; BL050; BL065, BL076; BL077; BL078; BL092; BL107i; BL102; BL103; BL111; BL101xii; BL096iii; BL135; BL137; BL150; BL172 | Concerns about impact on nature / wildlife / ecology. Will remove habitats. Rare species including spotted woodpeckers and nuthatches. Also house martins, owls, thrushes etc. Concern about effect the development would have on the ecology of the site, i.e. site clearance, top soiling, increased shading, and increased chemical run-off, less prey. Two deer from Raby Castle | |
| BL051 | A wildlife meadow could be created with local people donating bulbs, cuttings and future maintenance. | |
| BL012; BL051; BL056 | Should be a haven for wildlife, walking (Inc. dogs), space to picnic and play (although no formal children's play area). A nature trail may be a nice inclusion for families. BL051 - The 'wood' should be left intact. Some seats and bins would be welcome. | |
| BL055 | No details of a Wildlife Survey other than bat movements. Particularly keen to see how housing proposals are sympathetic to existing flora and fauna and how species will be encouraged within the proposal (bat/Bird boxes, wall cavities for nesting etc.). | |
| BL050; | Lack of information on impacts of development on ecology of the site, mitigation measures, impacts caused by hard surfaces, management and site maintenance plans and population monitoring programme. Was this survey an independent review? Please could you issue this for review? | |
| BL082; BL084; BL140 | There should be no building whatsoever on the historic parkland because of detrimental impact on wildlife. Foxes, badger, bats, newts and other fauna. | Do not build on the parkland - leave it as an area for all to enjoy |
| BL0091; BL172 | Recommended that existing ponds are retained for biodiversity purposes. Additional ponds should be constructed for attenuation and designed to be beneficial for wildlife, particularly protected species found in the vicinity (EA). | |
| BL0091 | Great crested newts have been recorded in this area. These are protected by law (EA). | |
| Officer comments | | |
| The majority of the former golf course lies within an area at high risk of great crested newts and the remainder lies within a medium risk area. This does not prohibit | | |

| General - Wildlife | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| | <p>development. However, future developers would have to obtain a licence from Natural England before development started. Developers would also have to submit a Phase II Habitat Survey with any planning application for development. The Phase II survey aims to establish the size of populations of the protected species, to maintain conservation status and ensure that no statutory offence is committed during site development.</p> <p>Natural England has set out specific requirements within its response and will maintain a watchful eye over the proposals for residential development. It can also exercise control at the planning application stage, not only as a consultee but also through the issuing or non-issuing of licences. With appropriately designed development and protection of wildlife during the construction phase, the impact on wildlife can be minimised. The proposals to create new wildlife habitats and increase public access will provide opportunities to enhance the character and local distinctiveness of the surrounding natural environment and bring benefits for the local community through access to and contact with nature.</p> | |

| General - Access | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL101; BL150 | Concerns about potential access point's impact on adjacent properties or breaking through wall on Blackwell Lane. BL101 - in addition impact on Carmel Road South a concern. | |
| BL041, BL088 ; BL117 | Object to the proposed plan, in particular the access routes from Blackwell Lane BL117 - there are too many proposed access for HE2 & 3. | BL041: Would like access routes to change - access route should be put on Carmel Road instead - not Blackwell Lane |
| BL045; BL110i; BL111; BL113 | Strongly object to any entrance that will damage the existing wood and wall. There is enough provision for existing roads to be used as entrances to any development BL110i - road too busy with poor visibility for new accesses. BL111 - Blackwell Lane heavily used by learner drivers and non-residents parking. | Existing roads should be used as entrances to any development |
| BL147 | All accesses should be off Carmel Road South. | |
| <p>Officer comments</p> <p>Various potential access points were highlighted through an assessment process and these will be reviewed to find the best solution to serve the development need and minimise impact. The number of junctions will be limited and hence reduce the need to break through the existing boundary wall unless deemed necessary. The existing access point to the rear of the hotel is the preferred option.</p> <p>Any proposed access point into the site would comply with current design guidance including adequate visibility splays for the speed of the road and be positioned accordingly.</p> | | |

| General – Highways | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL002 BL018; BL009; BL029; BL032; BL054; BL061; BL065; BL009; BL0099; BL092; BL107ii; BL101; BL104; BL111; BL124iv; BL125ii; BL127i; BL135; BL137; BL142; BL167BL144; BL143; BL147; BL148; BL150; BL168; BL170; BL172 | Will bring increased traffic; potential impact of traffic on Blackwell Lane and Carmel Road South (including impact of relocation of football ground to Blackwell Meadows); Should be no further access made from Carmel Road South unless a north access to the A1 (M) is built from the A66 (M); Blands Corner is an 'accident waiting to happen'; BL137 - Already extensively used by through traffic. BL170 - Existing problem with HGV's using Carmel Road South. | Be bold as a local authority and designate it all as parkland for the benefit of Darlington people and as a hidden jewel to attract business and visitors as part of the overall economic strategy for this town. BL107ii - suspend process to look at new road proposals that could cope with the densities proposed. BL0125ii - Should limit development to that originally proposed. BL135 - Numbers should be reduced to provide a more sympathetic development. BL137 -Resultant traffic impact should be given further consideration. |
| BL021 | Traffic bottleneck on Carmel Road South (road not designed for this volume of traffic). | |
| BL045 | The entrance (road) at the top of Blackwell Bank is very dangerous. | |
| BL011 | Developer should forward details of the type of housing and predicted flows to Highways England for more detailed consideration. | Collaborative approach between developer, DBC and Highways England requested. |
| BL011 | With its scale and close proximity to A66/Blands Corner development will generate over 30 trips in the peak hour. Initial look indicates it will likely be much higher possibly 200+ trips and would therefore likely require a Transport Assessment and Travel Plan. | |
| BL011 | Blands Corner Roundabout is under review for a scheme to relieve current capacity issues as network at capacity on this junction. Development WILL require mitigation. Current proposals for larger roundabout with reduced number of exits. Land adjacent should be able to accommodate. | Collaborative approach between developer, DBC and Highways England requested. |

| General – Highways | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL012; BL144 | Concerned over how parking and additional traffic will be managed. | Sufficient parking should be provided. |
| BL014; BL081 | Right turn onto Grange Road very difficult. | |
| BL015; BL0099 | Blackwell Lane gets very busy when events are on at South Park. | |
| BL054; BL081; BL137 | Speeding already an issue in the area despite numerous complaints to police and councillors. Particularly on Bridge Road, Carmel Road South and Blackwell. | |
| BL054; BL082; BL0099; BL103 | Concern over use of Blackwell Meadows by the football club using the same roads to access and park. | |
| BL050 | Usually a tool for outline planning permission. Has this really been carried out at this stage? Why was tax payer's money spent on this? | |
| BL057 | Has the Council considered the extra traffic and what are the plans to deal with this? | |
| BL069; BL077; BL078; BL081; BL082; BL085; BL102; BL103 | Concern over highway safety: Increased congestion on Carmel Road due to increased traffic flows, making it difficult to exit Blackwell onto Carmel road and turn right into Blackwell Lane at peak times. This junction is already difficult to cross and there will be issues of highway safety. Increased traffic flow to and from Blands Corner roundabout which is already extremely busy and difficult to negotiate. This area has a lot of elderly people and families whose lives would be put at risk. | |
| BL069 | How will Blands Corner handle the projected future growth in traffic from the new developments? | The speed limit on this area of the A66 must be lowered to 40mph from the Blackwell Bridge to the crest of the hill, then to 30mph from just before the Blackwell turning to the A66/A167 Blands Corner roundabout. Further work needs to be done on the impact of development generated traffic. |

| General – Highways | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL0099; BL095; BL103 | Will become one giant car park, with an extra 4000 plus houses / flats proposed and DFC moving back to Darlington, Rugby club with 250 parking spaces for up to 2000 fans; Support but need to be mindful of parking. | |
| BL110ii; BL101; BL137; BL150; BL154; BL157 | Traffic from the development once built and construction traffic may have a significant effect on road safety. | |
| BL102 | Hundreds of additional vehicles will severely damage the road and become dangerous for residents. | |
| BL111 | Blackwell Lane already as car park for people working in the Town Centre. | |
| BL125ii | No allowance for car parking will have knock on impact on surrounding roads | Impact on development |
| BL142 | When the yellow lines are put on Grange Road, Snipe lane and Carmel Road South, cars will park anywhere in Blackwell vicinity. | |
| BL150 | Highways Agency (England) comments should be sought. | |
| BL150 | Has the construction of the historic lane (Blackwell Lane) been considered? | |
| <p>Officer comments</p> <p>A Transport Assessment is currently being produced in consultation with Highways England that will demonstrate the impact of the proposals on the local and strategic highway and this will help to inform the density of building on site. As part of the assessment accident statistics are reviewed and taken into consideration. This will also include a Travel plan that will assess the needs of non-motorised users. Bridge Road and the A66 is owned and maintained by Highways England. There are proposals to improve Bland Corner roundabout which Highways England are reviewing. Off-site highway improvements to mitigate the development traffic would be highlighted as required within the Transport Assessment.</p> <p>Any proposed access point into the site would comply with current design guidance including adequate visibility splays for the speed of the road and have been positioned accordingly.</p> <p>Proposed junctions on Carmel Road South would incorporate localised widening of the carriageway in order to create a ghost island T junction to help prevent the blocking of mainline traffic by right turning traffic into the sites. Junction assessments will be carried out to ensure the new junctions have sufficient capacity to meet the development need. Generally a ghost island T junction would be sufficient to take the generated traffic from a development of 230 dwellings with mainline flows over 13,000 AADT (Annual average Daily Traffic Flow) as experienced on Carmel Road South. Mini roundabouts would be an unsuitable form of junction on Carmel Road to</p> | | |

| General – Highways | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| | <p>access this development.</p> <p>Traffic regulation orders in the form of double yellow lines are proposed along significant lengths of Grange Road, Carmel Road South, Croft Road and Snipe Lane as part of the DFC planning permission to help regulate parking associated with match days.</p> <p>A construction management plan would be a condition of any granted permission and would control construction routes to site.</p> <p>The highways are routinely inspected for defects and remedial action taken where necessary.</p> <p>Car parking to serve the development would be in line with the Residential Design Guide and Specification for the Tees Valley and would be appropriate to the dwelling size and type proposed.</p> <p>The access point from The Spinney was reviewed as an option however is not one of the preferred access points for vehicles although could form a pedestrian/cyclist route to allow access to the parkland and continue along the former Mill Lane to improve pedestrian permeability to the site.</p> | |

| General – Amenity and Open Space | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL001; BL063; BL077, BL009; BL092; BL104; BL112; BL113; BL115; BL132; BL142; BL150; BL164 | Must keep green areas for future generations to enjoy. Parkland would better serve the community. | BL115 - No housing at all. Develop parkland as area of beauty with walks, revamped lake, and picnic areas. BL132 - suggest site is developed as a cycling facility or as a parkland to visit with refreshment facilities |
| BL002; BL0023 | Worried about mess; disruption during construction. | |
| BL002; BL065; BL111; BL113; BL140; B150; BL0067; BL054; BL065; BL133; BL075; BL163 | Will disrupt the lovely area of Blackwell, will affect area and not for better; Will ruin the character of the area; Object to the environmental damage that would ensue as a result of any development; Only decent approach to Darlington will be destroyed. | |
| BL002 | Development very close to house being purchased (not specified). | |
| BL023 | Concern over loss of green space (golf course) which children use for playing. There are not many large green areas on our doorstep. | Would like to have continued use of open space outside our house as place for children to play |
| BL041 | Moved to this area for peace and tranquillity- but now face a noisy road and busy cosmopolitan style housing. | |
| BL012 | Concern that low fences to the fronts of properties will not work. People value their privacy too much. | High walls and screening would be better. |
| BL054 | Will destroy Green belt. | |

| General – Amenity and Open Space | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL054; BL107i; BL101; BL143 | Will devalue and destroy the present views from existing properties. | BL107i - building should be carefully planned and low density, in keeping with the parkland setting |
| BL061 | Concern over loss of green space - should be sold to residents to extend gardens or managed by a group. | All planned building to be stopped |
| BL076; BL143; BL150; BL167 | Loss of privacy and daylight. Increase in light pollution compared to golf course use. BL150 - increased vermin and noise; BL167 - noise | |
| BL082; BL084; BL111; BL137 | There should be no building on this lovely open area of Darlington | |
| BL0099; BL143; BL172 | Detrimental impact on residents with over development, loss of character; visual impact | |
| BL0099; BL142; BL143; BL145 | Loss of privacy for residents, overlooked, with 3 storey buildings; Overbearing to the immediate community and have an oppressive impact on the surrounding area and housing. | |
| BL112 | Noise and Smell mainly from the existing hotel until 2am, late functions with loud music, fireworks, air-conditioning units etc. | |
| BL135 | Important part of the western fringe of the town and a link to the surrounding countryside. | |
| BL144 | Proposed dwelling to the rear of No's 18/20 Upsall Drive too close to these properties. The design size and footprint required to assess the impact of loss of privacy and overlooking | |
| BL145 | Enjoyment of a view is an important part of the residential amenity of neighbouring properties, and the loss thereof will have an adverse impact on the residential amenity of those properties. Would result in housing development adversely affecting the view from the Grade II Listed Grange. No evidence that such matters have been taken into account. | |
| BL145 | A tree planting scheme that affords privacy to residents on Grangeside and The Spinney that complements the trees that encompass the pleasure walk behind the wall that follows Blackwell Lane should be implemented, restoring the walk that joined the pleasure walk with Mill Lane for the benefit of the people of Darlington. | |
| BL147 | There should be no play areas as these encourage anti-social behaviour. | |

| General – Amenity and Open Space | | |
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| Consultee Ref | Summary of Comments | Change Proposed (if any) |
| BL163 | The verged area in the Spinney, together with the wooded area running alongside Carmel Road and Grangeside have been used by residents as recreational areas for numerous years - loss of common area would be significant. | |
| <p>Officer comments</p> <p>Residential development on the site is acceptable in principle. All of the statutory consultees who responded accepted the principle of residential development providing the impact of the development is minimised and mitigated.</p> <p>Although the proposal would involve loss of some open space, it retains the majority of it, and would result in improvements to the remainder of the open space. A parkland restoration plan would form part of any planning application.</p> <p>Loss of value of property is not a planning matter. Research undertaken by London School of Economics found that prices of existing houses sometimes fell while construction was going on, but once the developments were completed, the local areas generally moved with the market. Researchers could find no evidence of longer term negative impacts.</p> <p>Impact on a person's view is not a planning matter, though impact on an individual's amenity and the amenity of an area is. However, it is generally accepted that putting high quality residential development next to existing housing will not detrimentally affect the amenity of existing residents. The residential amenity of existing and future residents would be considered as part of any development design and layout at the planning application stage.</p> <p>Detailed comments and suggestions regarding the development will be taken into account in the detailed design of any development, and residents will have further opportunity to engage in this through the planning application process.</p> | | |

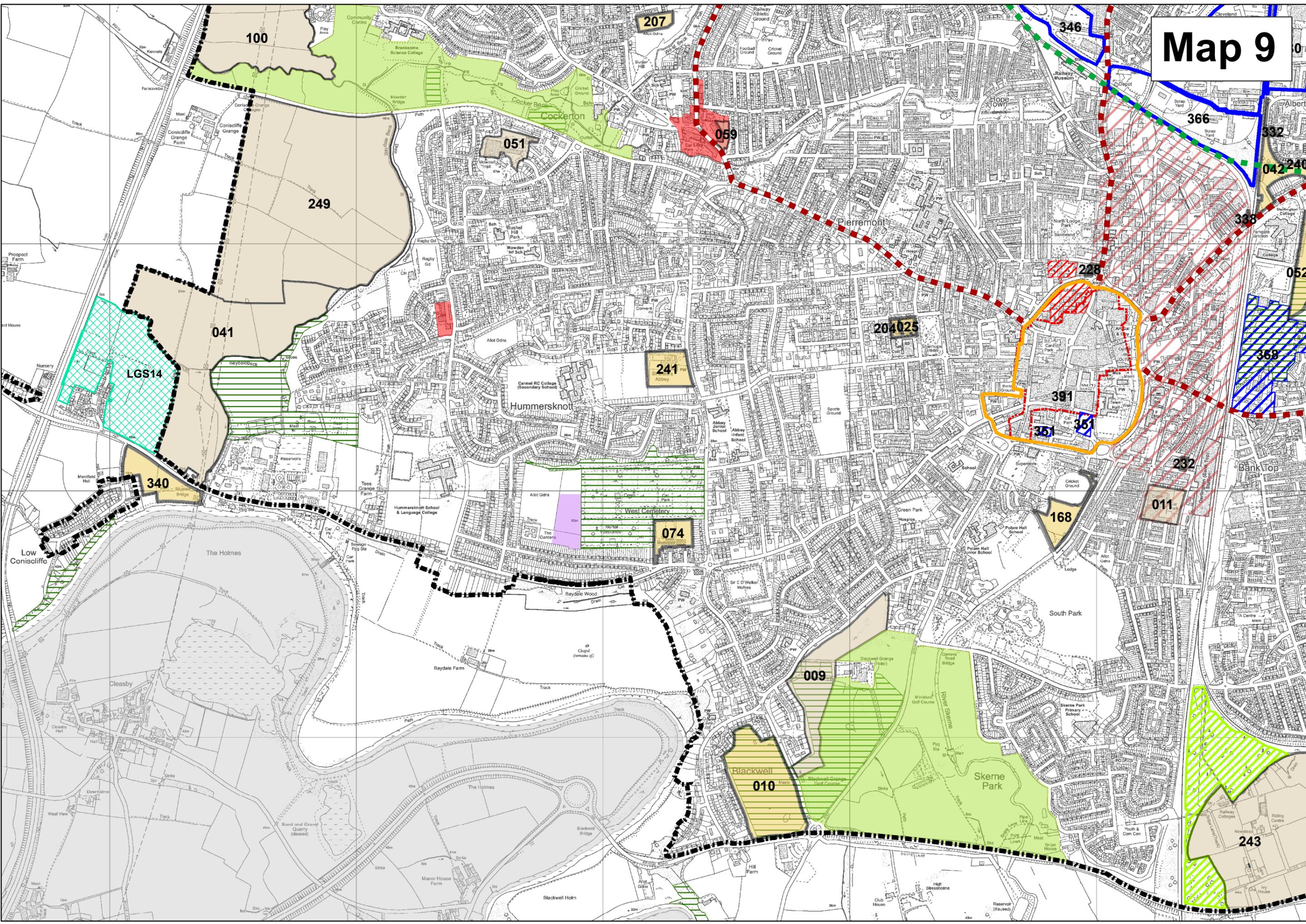
| General – Flooding and Drainage | | |
|--|---|--|
| Summary of Comments | Change Proposed (if any) | Change Proposed (if any) |
| BL021; BL0048 | Water run-off affecting Woodvale; During heavy rain water pours off former golf course into the back gardens of several properties in Upsall Drive, therefore effective drainage (especially for HE1) must be included to prevent the situation becoming worse. | More exploration into how perhaps the already flood prone Woodvale may be affected |
| BL050 | Why was this survey carried out? To identify flooding? What has been decided on the results of this survey? Have features been identified, and has this assisted in the proposals? | |
| BL0091 | Any development of the site should reflect the Tees Valley Authorities Local Standards for Sustainable Drainage Guidance (EA). | |
| BL0091 | Assessed that site is within FZ1 therefore at low risk of flooding (EA). | |

| General – Flooding and Drainage | | |
|--|---|--------------------------|
| Summary of Comments | Change Proposed (if any) | Change Proposed (if any) |
| BL112 | Drainage and Water Supply will not cope. | No development |
| BL142; BL143 | There are at times flooding in the area adjacent to Grangeside and cause damage to houses in the Grangeside and Spinney area. | |
| BL142; BL143 | The work proposed in the current consultation process may have a detrimental effect on the listed buildings currently on the Parkland in so much that the hotel may suffer from subsidence and / or drainage issues. | |
| BL145 | Council should utilise the natural drainage of the land behind Grangeside to drain into a small pond on the site of the Serpentine lake that was planned in 1802, for the land floods naturally in the winter. Further, there is already a subterranean watercourse (shown on the 1790 map) and substantial historic brick drainage running from the rear of Grangeside over towards the fish pond. The pond will encourage wildlife. | |
| BL160; BL162 | Why have the Council not taken on board the 2012 commissioned Archaeo-Environment report recommendations - especially with respect to flooding? Removal of existing trees will only increase the drainage problem. Paying a premium for executive housing with flooding issues doesn't sound terribly appealing. | |
| <p>Officer comments</p> <p>Environment Agency information shows that there is no flood risk affecting any of the development sites. However there is some land that experiences surface water drainage problems. This is not a constraint to development, as maintaining green field rates of surface water run-off would be dealt with through the planning application process by way of detailed planning conditions. There is also a strong probability that residential development would actually resolve the drainage problems as this would have an impact on the saleability of the new housing.</p> <p>The Drainage Study demonstrates that there are several drainage solutions, including the opportunity to incorporate a sustainable drainage scheme within the remaining parkland; the latter would have the added benefit of providing the additional habitat for the great crested newts and other species. Therefore drainage is not an insurmountable problem and could actually be improved for existing residents through the new development.</p> | | |

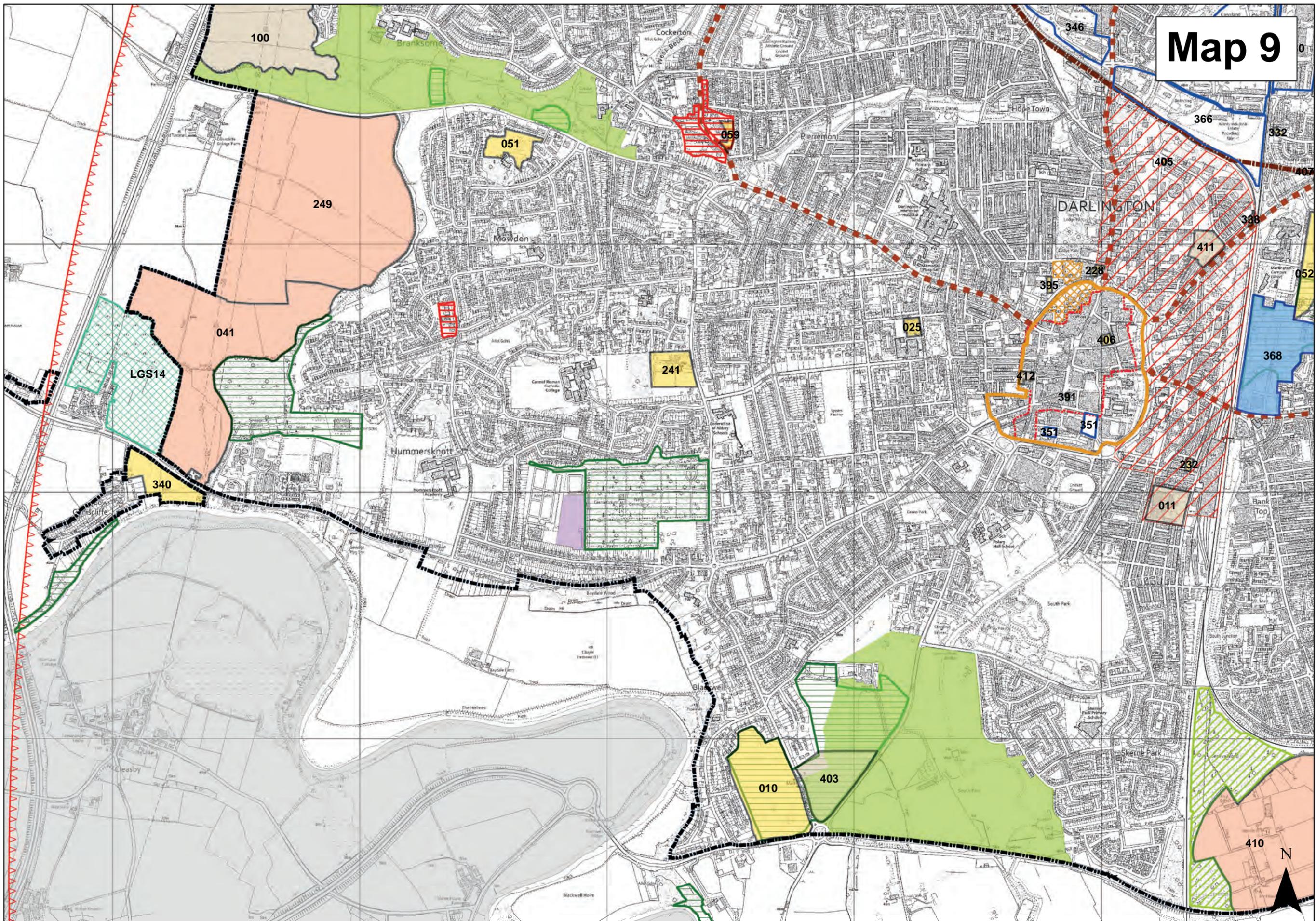
Appendix 15

**Policies Proposals Map Extract – Inset Map 9 – illustrating
Site 009 (June 2018) and Site 403 (August 2020)**

Map 9



Map 9



Appendix 16

Final Sustainability Appraisal Report Extract – Appendix G – Assessment of Development Site Options

Site 403: Blackwell Grange East

APPENDIX G: ASSESSMENT OF DEVELOPMENT SITE OPTIONS

Site 403: Blackwell Grange East

| | | | | | |
|----------------------------|--------------------------------|-----------|-----------------------------------|--------------------------------|-----------|
| Site Reference | 403 | | Current Use | Disused golf course/open space | |
| Site Name | Blackwell Grange East | | Proposed Use | Housing | |
| | | | Potential Housing Yield | 72 | |
| Site Area (Ha) | 5.26 | | Potential Employment Yield | n/a | |
| Site Constraints | Area covered (Ha)/Length (m) * | % of site | Site Constraints | Area covered (Ha)/Length (m) * | % of site |
| Flood Zone 2 | 0.00 | 0% | Tree Preservation Order | 18 TPO'd trees & 1 group TPO | 10% |
| Flood zone 3 | 0.00 | 0% | Ancient Woodland | 0.00 | 0% |
| Grade I Listed Building | 0.00 | 0% | SSSI | 0.00 | 0% |
| Grade II* Listed Building | 0.00 | 0% | Local Nature Reserve | 0.00 | 0% |
| Grade II Listed Building | 0.00 | 0% | Local Wildlife Site | 5.00 | 95% |
| Conservation Area | 0.00 | 0% | Local geological sites | 0.00 | 0% |
| Scheduled Monument | 0.00 | 0% | Landfill site | 0.00 | 0% |
| Historic Parks and Gardens | 0.00 | 0% | Major industrial hazards | 0.00 | 0% |
| Public Right of Way* | 0.00 | - | Minerals consultation area | 2.56 | 49% |
| Open space | 0.00 | 0% | High Pressure Gas Mains* | 0.00 | - |
| Playing fields | 0.00 | 0% | Overhead Powerlines* | 0.00 | - |
| Access to Services | Distance within (metres) | | Access to Services | Distance within (metres) | |
| Primary school | Within 1200m | | Train station | Beyond 1600m | |
| Secondary school | Within 1200m | | GP practice/hospital | Beyond 1600m | |
| Higher education | Beyond 1600m | | Local centre/shopping facilities | Within 1600m | |
| Employment opportunities | Within 1600m | | Open space | Within 400m | |
| Frequent Bus Service | Within 400m | | Playing field | Within 400m | |

| Sustainability Objective | Significance of effect | Probability | Duration | Frequency | Reversibility | Spatial extent | Commentary |
|---|------------------------|-------------|----------|-----------|---------------|----------------|---|
| 1. Provide a mixture of affordable, well designed and sustainably located new housing, and improve the standard of existing housing, especially to provide for young people, families and older people. | ++ | L | LT | P | R | LA | The site is not well served by services and facilities but has good connections to existing footpaths, cycle routes and public transport. Capable of providing a significant amount of affordable housing and lifetime homes. The site is reasonably well connected to the town centre. |
| 2. Develop vibrant and cohesive communities. | -- | L | LT | P | R | LA | Site development will result in the loss of part of an open space (disused golf course) with no prospect for replacement on site. Development could however help restore the parkland setting to Blackwell Grange. Able to provide an element of affordable housing and help support existing local community facilities. |

APPENDIX G: ASSESSMENT OF DEVELOPMENT SITE OPTIONS

| | | | | | | | |
|---|-----|---|----|---|---|----|---|
| 3. Improve the health and wellbeing of all, reduce health inequalities and promote healthier lifestyles. | - | L | LT | P | R | LA | Site has good access to green infrastructure and the public rights of way network, but would result in the loss of part of an existing open space. Site does not have good access to existing health facilities. Majority of site is greenfield land. Site is not large enough to provide allotments as part of development. |
| 4. Provide education and training opportunities to improve the skills and employment prospects of the resident population. | ++ | L | LT | P | R | SB | Access to a bus route with frequent service to higher education facilities in Darlington (requires changing buses in Darlington). Within 2km of a higher education establishment. Polam Hall School is the closest primary school (awaiting information on school capacity), but there are other primary schools in the vicinity. |
| 5. Improve the safety and security of people and property. | 0 | L | LT | P | R | SB | The site will have no detrimental impact on safety and security. |
| 6. Achieve sustainable levels of economic growth and increase employment levels and access to sustainable and high quality employment opportunities | 0 | L | LT | P | R | SB | Site promoted purely for non-employment/commercial use. Site is not close to a town or local centre. |
| 7. Encourage sustainable travel. Provide development which reduces reliance on private vehicles, maximising access to public transport and active travel modes. | + | L | LT | P | R | LA | Site is located close to a bus route with a frequent service allowing access to services/facilities and job opportunities. Access can be taken from Carmel Rd South, with junction spacing placed to work with the Blackwell Development opposite. Possible contribution to Highways England required due to impact on Blands corner. |
| 8. Reduce greenhouse gas emissions and increase the borough's resilience to climate change. | +/- | - | LT | P | R | CB | All new development will have an impact but will be required to adhere to relevant national standards (construction, materials, energy efficiency of building). |
| 9. Make the most efficient use of land. | 0 | L | LT | P | R | SB | Site classified as urban (ALC - provisional). Majority of site is greenfield land. Approximately half of the site is within the Oxney Flatt minerals consultation area. Site is unlikely to contain contaminated land. |
| 10. Minimise levels of noise, vibration, odour and light pollution. | +/- | L | LT | P | R | SB | The southern corner of the site is next to the busy A167/A66 roundabout but there is scope for mitigation within the site. |
| 11. Avoid and reduce flood risk from all sources including fluvial, surface water and sewer flooding. | ++ | L | LT | R | R | SB | Site is entirely within Flood zone 1. |
| 12. Protect and enhance air and water quality and make efficient use of water. | - | - | LT | P | R | LA | Site is likely to have a limited effect on local air quality that could be mitigated. The site is covered by the Blackwell Grange Golf Course Local Wildlife site. |
| 13. Protect and enhance biodiversity and geodiversity. | - | - | LT | P | R | LA | The site forms part of the Blackwell Grange Golf Course Local Wildlife Site. The site contains numerous TPO |

APPENDIX G: ASSESSMENT OF DEVELOPMENT SITE OPTIONS

| | | | | | | | |
|--|--|---|----|---|---|----|--|
| | | | | | | | trees/groups that form a continuous strong tree belt along Carmel Road South/Grange Road and across the centre of the site. Site is within an area of high interest with regards to Great Crested Newts. |
| 14. Protect and enhance green infrastructure of all types. | - | L | LT | P | R | LA | Site is part of the Blackwell Grange Golf Course Local Wildlife site. Loss of existing open space. |
| 15. Protect and enhance the character and quality of Darlington's landscape. | - | - | LT | P | R | LA | Loss of parkland setting. Site located at an important entrance to the town. Significant mature tree belt forms the boundary of the site to both Carmel Road South and Grange Road minimising views into the site. |
| 16. Conserve and enhance Darlington's distinctive and valuable historic environment. | -- | - | LT | P | R | LA | The site forms part of the grounds to the Grade II* listed Blackwell Grange Hotel (and Grade II listed outbuildings). Development will affect setting of the Grade II listed Blackwell Grange and its parkland curtilage. Significant mitigation and public benefit required to offset the harm caused. Within an area of high archaeological potential. |
| Overall Predicted Effect: | The site forms part of the grounds to the listed Blackwell Grange Hotel and was previously used as a golf course. The site is not well served by services and facilities but has good connections to existing footpaths, cycle routes and public transport. The site should be capable of providing an element of affordable housing to help meet local needs. Development would result in the loss of open space. Development will affect setting of the Grade II listed Blackwell Grange and its parkland curtilage. | | | | | | |
| Potential Mitigation: | <ul style="list-style-type: none"> ● Would need significant mitigation to restore the remaining parkland area to the Grade II Listed building. ● Habitat improvements required throughout the site. ● Retention and maintenance of TPOd trees on the site. ● Site development would require mitigation for the loss of open space. ● Possible highways contribution required towards additional traffic on A66/Blands Corner. ● An archaeological evaluation of the site should be conducted prior to development. ● Make suitable provision for the education needs of new residents. ● Provide for the infrastructure needs of the development (including utilities, highways, community facilities and open space). | | | | | | |

Appendix 17

**Submission Draft Darlington Local Plan 2016-2036 (August
2020) –**

Appendix B Extract

B HOUSING AND EMPLOYMENT ALLOCATION STATEMENTS

Issues and requirements

- a. The site lies adjacent to an employment use to the east. A landscape buffer should be provided adjacent to the neighbouring use to mitigate any impacts.
- b. A public right of way runs alongside the sites northern boundary.

Site 355 - Lingfield Point (Mixed Use)

The majority of this site is brownfield land and is occupied by some existing employment uses. It is situated to the east of the main urban area of the Borough and to the south of the B6279. It is proposed for allocation for mixed use development with an indicative yield of 331 dwellings and potential B1 and B2 uses .

Issues and requirements

- a. Potential for contaminated land which should be remediated as part of a development scheme.
- b. The site is adjacent to employment uses to the west; mitigation would be required.
- c. A public right of way runs alongside the sites southern boundary.
- d. There is a raised reservoir along the southern edge of the site along with a small wooded area.
- e. The site lies close to the Redhall Wetland.
- f. Northern boundary of the site is adjacent to the Stockton & Darlington Rail Line. Interpretation should be provided within a scheme.

Site 403 - Blackwell Grange East

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 the setting of the Grade II listed Blackwell Grange and its parkland curtilage. Significant mitigation and public benefit are required to offset the harm caused. 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. 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.
- d. 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. 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.