

MEMORANDUM

From: **Sebastian Pickles - Conservation Officer** To: **Emma Williams – Planning Officer**
Ref: **21/00708/DC & 21/00709/DCLB** Date: **27th October 2021**

APPLICATION: APPLICATIONS FOR FULL PLANNING PERMISSION AND LISTED BUILDING CONSENT – FURTHER COMMENTS

SITE: RAILWAY HERITAGE QUARTER, STATION ROAD, DARLINGTON

Thank you for the re-consultations of 6th October 2021, requesting further conservation and design advice in respect to the extensive proposals at the stated site.

I have assessed the additional information and comments and would now offer the following comments.

Summary Conclusions

As previously set out I am supportive of the principle of the scheme. I however raised serious points of concerns where I considered the proposed to be unacceptable and required amendments and further consideration.

While the Architect has supplied comments in response to certain key concerns, there have been no significant amendments, especially in respects to the Grade II* Goods Sheds. I am therefore must reinforce my position that as currently presented I am unable to support the proposals and would raise an objection to the proposals as currently presented.

While there are several positive elements to the proposals these do not outweigh the substantial harm which would be inflicted upon this nationally and internationally significant Railway Heritage site. I do not consider the current proposals to be acceptable and form an unacceptable level of harm and an entirely missed opportunity to form an enhancement to such a significant site.

Heritage Asset Significance

Within the additional information there has been no update to the submitted Heritage Statement. However, the Architect has provided responses to several points which were raised. From review of the comments it is clear that there certain comments have not been considered and reviewed in full.

The Impact of the Proposals

As previously set out I am supportive of the general principles of the proposals for the highly significant railway site, however there were many pressing concerns raised with proposals which would have a significantly harmful impact to the significance of the site. I would also again set out that the proposals directly conflict with the guidance and advice which was given during pre-application discussions.

Good Shed

As noted the Architect has provided response to certain points raised in my initial comments.

One of the points raised is in respects to the understanding of the access to the Goods Shed. The comments refer back to the Archae-Environment report produced in 2013. The Architect states 'this view appears to be based on the belief that the current situation reflects the original relationship and historic intent and this is simply not the case'.

I would object to this statement as the assessment of impact is based upon a good understanding of the development of the site from the opening in 1825. Having reviewed this document on numerous occasions it is clear that the Architect has not read the report in full and focused on certain elements of the report which reflect the current proposals. Additionally I am not convinced there has been a thorough understanding of the original access to the site.

What is not picked up on by the Architect is that the access to the site very quickly changed post 1825. As is discussed in the report and can be seen from studying the historic mapping there was a significant change with the removal of the level cross on High Northgate. The existing bridge, Grade II Railway Viaduct was constructed in 1856, some 31 years after the first opening of the S&DR. The land levels were regraded to allow for the Viaduct. This saw significant re-grading of the lands around and thus changing the key access point to the site and also to the Goods Shed, which ceased being used as a Good Shed in 1857.

I would equally echo my previous comments that during pre-application discussions a report was produced by the Architects which clearly stated the harmful impact on the setting of the II* Goods Shed and the Northgate Conservation Area. Therefore the current proposals are in conflict with their own initial findings. The report can be provided to provide weight to these comments.

The comments also discuss the issues around the proposals for Goods Shed itself. As is noted the building is of high significance and is considered to be the earliest surviving Goods Shed. My previous comments raised many concerns to the current approach for the reuse of the building, whilst accepting the overall principle of the reuse of the building the proposals have to appropriate and sensitive to the highly significant building and as presented this is not the case.

While there have been some changes to the proposals previously set out, these focus more on the materials and change from the use of concrete to the floor, however this appears to be the only change. The comments received focus heavily on the submitted Heritage Statement and that the findings of the report. The comments also appear to show a lack of understanding of the significance of the building and simply disregards the fabric which is not contemporary with the original phase of development. Part of the significance of the building is this historic development of the building. The detail is however entirely dismissive of the report produced in 2013 and more recently the Architectural report produced by Historic England produced in 2021, which was available at the time of and during the application. The comments received state that I have reservations about the proposed glazed extension to the northern elevation. I would clarify this point that I raised an objection to the glazed extension and stated 'the extension is required to be removed as it forms an unacceptable level of harm' I feel that these comments have been made light of and my view is expressly clear in this regards. The glazed extension is poorly

considered and represents a feature which would have a detrimental and negative impact to the significance of the building. I would restate my objection to the proposed glazed extension which again should be omitted from the plans.

As previously indicated I consider the existing timber doors to the north elevation should be retained. The plans remain unaltered and comments have been submitted to state that the removal of the doors and insertion of the glazed sections would reconnect the lost visual connection. This comments feels purely subjective and there can not be any weight afford to it. I would restate that the doors should be retained and as previously set out the glazed panel fitted behind the door so the doors are retained, however can be opened during operational times and allow for the addition light. This is a more appropriate and acceptable approach than is currently being afforded, which pays little regards to the significance of the extant fabric.

It is positive the plans have been amended so there will be no use of concrete to the flooring. While this is positive there remains a lack of detail in respects to the archaeology of the extant floor. As references in the 2013 report and 2021 report there is a high degree of certainty that there will be historic industrial features which need to be given due consideration and currently have been afforded no form of consideration.

The proposed toilet pod has been retained within the plans and comments provided to show that this pod should be accepted as it will not harm the historic structure. Referring to my previous comments I set out that the pod would form a negative feature within the building which would not enhance the existing space. Comments have been provided to set out that the toilet pod is necessary to support the function of the space. Had my previous comments be reviewed fully, it would have clearly showed that I had afford this consideration and that with the removal of the more modern extension to the western elevation being removed, a small new addition could be considered for the purpose of toilet facilities. This would remove the need for the pod system and allow for the space to be more well considered and its significance more appreciated. I would restate my objection to the toilet pod and again set out that the plans should be amended and consideration given to relocating the facilities to the western elevation.

There are no real amendments to the proposals for the Goods Shed and the comments provided attempt to provide justification for the proposals. There were several other elements which I raise in my previous comments which the Architect has proposed conditions to cover some, however there remain several other key elements which have not been addressed including the proposed extraction and vents to the roof and clock tower.

I must again stress my objection to the proposals for the Goods Shed and that the harm to the significance of the building has not been considered and the scheme would not form an enhancement to the highly important building and wider site, but would have a detrimental impact. The proposed would verge on substantial harm to the highly graded Listed Building.

Head of Steam

With the proposals for the Head of Steam additional detail has been provided. There have been some amendments with the removal of insulation and the existing bay to remain unaltered. There has been further clarification in respects to the replacement/encapsulation and I am generally satisfied with the detail. I am equally generally satisfied with the detail of the proposed replacement doors.

The main element which I raised an objection to was the proposed black box pod. As previously set out the pod will create a visually harmful addition which will detract from the character of space. The feature would be entirely alien and create a harmful feature. The Architect has set out that within the D&A Statement that it was accepted that it would have some impact on the setting. It further explains that the statement sets out that the relationship of the pod is unlike the existing pods. I do not consider this identifies the harmful impact the box will have. The comments further develop to set out that they do not consider relocating the box internally would that the impact if moved internally would be far more severe. This is only looking at the proposals as currently proposed and there are other options which could be considered. I would restate my objection to the placement of the pod and consider that this should be reconsidered and consideration given to placing this internally.

Carriage Works

With the proposals for the Carriage Works it is noted that there have been several amendments to the proposals. The existing door to the east elevation is now to be retained and new glazing to be inserted behind. There has been confirmation that the main staircase is to be retained, however it has been noted that a small offshoot needs to be in part demolished to allow for fire safety. Further detail would be required for the section to be removed, however the principle is reasonable. The tracks within the south shed are to be retained, but the tracks to the north are to be removed. While maybe being more recent additions, they represent a feature which has a positive contribution to the building and should be retained.

Lime Cells

As previously set out I was generally supportive of the proposals, however did raise some concerns and additional detail was needed. I am generally satisfied with the detail. I have however noticed there is the intention to apply internal wall insulation using wood wool board, but also notes the use of independent wall lining with plasterboard lining. I raise some concerns of the proposals for insulation the building as there needs to be a holistic approach to this and the same applies to all buildings. The first step should be to undertake all repairs to the building and then an assessment of the building. Changes made to the building without an understanding of the impact can lead to a detrimental impact to the historic fabric of the building. I would additionally set out that the use of damp proofing or tanking in any form should be entirely unacceptable. The approach to historic buildings needs to be undertaken in a manner which does not simply apply modern methods of assessment.

1861 Building

Further detail has been submitted for the 1861 building of which I am generally supportive of.

Link Bridge

As previously indicated I set out that I do not support the currently proposed design or materials. The Architect as set out that this matter could be resolved by condition, however given the concerns over the design I would not agree with this approach. I do not support and would object the bridge as currently proposed. While the principle is accepted, the design and materials require an entire redesign.

CONCLUSIONS

Overall I consider that there are still substantial areas which remain unacceptable. The plans remain mostly unamended and I do not consider the submitted comments to resolve the concern.

My advice remains that while supporting the general principle, I would raise a statutory objection to the proposals. There is a clear lack of understanding of the significance of the site and the impact specifically to the Grade II* Goods Shed, the setting of and the Northgate Conservation Area. I remain entirely unsupportive of the proposals to the Goods Shed and the proposed new entrance and works required for this.

As set out within my previous and additional comments there are key areas of concerns which were raised during the pre-application discussions and previously comments and have continued to be progressed with minimal amendments and consideration to the advice being given.

I still consider that the proposals do not accord with Policies 197, 199, 200, 202, 206 of the NPPF. I would equally raise concerns in respect of Policies 66 and 72 of the Planning (Listed Building and Conservation Areas) Act.

The proposals in respect to the Goods Shed and its setting of are verging on causing substantial harm to the highly listed asset and its special significance. I would additionally set out that the benefits put forward are not sufficient to outweigh the proposed harm and there are alternative options which can be considered which would still achieve the aims for the site, but would have a significantly lesser impact.

As I have set out there are reasonable amendments which can be undertaken in order to achieve an acceptable scheme of which were raised during pre-application discussions and my previous comments. I am wholly supportive of the overall scheme and as seen there are several positive elements and wish for Darlington Railway Heritage to be celebrated, however the harm is of an unacceptable level and gives lack of consideration to the significance of the site.

As I have set out I consider that amendments and changes are still necessary and these are detailed in my initial and updated comments. These comments and advice should be fully reviewed and plans amended. I would welcome further engagement from the design team and further consultation on the proposals.

Sebastian Pickles

Conservation Officer