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Research - Conserve - Campaign

24th April 2022

Vicky Webb
Derbyshire County Council
Matlock
Derbyshire DE4 3AG
development.management@derbyshire.gov.uk

Dear Ms Webb,

Ref : CD9/0222/34 – Conversion and extension of existing buildings to commercial use, and construction of access drive and car park; Elvaston Castle Country Park, Borrowash Road, Elvaston, DE72 3EP

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Derbyshire Historic Gardens Trust (DHGT) and their local knowledge informs these joint comments upon the above proposals. It is disappointing that Derbyshire County Council did not consider engaging with the Gardens Trust when developing the Master Plan, as our very specialized statutory remit, whose requirements have been in place since 1995, is entirely focused on the impact of 'development likely to affect' historic designed landscapes in relation to Grades I, II* and II registered sites.

There is a considerable amount of information relating to this application and as our remit relates to the impact of the developments on the setting and significance of the Grade II* registered park and garden (RPG) of Elvaston Castle we will focus principally on this rather than commenting on the laudable aims for restoration of buildings within the core area surrounding Elvaston Castle itself.

We fully support the restoration plans for the various buildings and their proposed new uses, and whilst the new café is not an entirely sympathetic entity within the paddock behind the North Range east carriage archway, we can understand the necessity of such a facility. We have to accept the findings that there is no existing building of sufficient size within the core buildings to support this venture.

At the beginning of the Heritage Statement (HS) (Introduction para iii) it states : '*The park requires only a brief appraisal here, because its broad history is well-known and appreciated, **and the current application is of little direct relevance to it.***' (our emphasis). We are perturbed to read such a statement, as the siting of a major proposed new drive and car park directly adjacent to and occasionally passing through the RPG, has very direct relevance to this nationally important registered landscape. The HS fails to describe the significance of the RPG and although it is mentioned in the Planning Statement (Paras 5.29 and 5.30), both documents are dismissive of the crucial importance of the setting to the significance of the RPG. In the absence of a conservation management plan, we would have at the very least have expected the HS to identify historic views towards and from within the RPG, not just those within the Landscape Visual Appraisal (LVA), as well as identifying sensitive areas least able to accommodate change. We consider therefore that the heritage statement fails to adequately identify the significance of the RPG and its component areas. It is also very surprising that nowhere amongst the suite of documents is there an up-to-date Master Plan of the proposals (both Phase 1 and Phase 2) or any kind of plan which superimposes the proposed changes, and in particular the new drive and car park, over a map of the RPG.

Without such information, it is not possible to adequately identify impact upon the RPG and as the new drive is such a major imposition upon the landscape, it is not always easy to see where it crosses over into the RPG as opposed to running alongside the western edge. It would appear to enter the RPG in two areas : firstly where the drive begins at the new roundabout with the B5010, and secondly where the new drive meets the south-west corner of the cricket ground, where woodland areas W8 and W9 are to be found, before bending up again to the north. ('Cricket Pitch knuckle')

The HS (1a.4) suggests that *'there appears to be a general consensus that the roundabout and the short length of drive through the wood form the most contentious part of the current proposals.'* We disagree and are more concerned about the area of the RPG around 'Cricket Pitch Knuckle' and the route for the new drive which is readily visible from here and from the permissive footpath across Oak Flat. Photo A at the end of this letter shows the obviously visible view WSW from near the SE corner of the cricket ground where the new access route follows the fence line towards the parked car. This particular area of drive is precisely where a good view out to the surrounding countryside from within the RPG, and vice versa has always been possible. The drive passes through an area known as Oak Flat beyond the boundary of the RPG. The HS (Paras 4.2 & 4.3) refers to the 1822 OS Survey Drawing and highlights the importance of this area to the setting of the RPG as the *'most park-like'* of the landscape outside the RPG and *'stippled to show that it was then considered as part of the ornamental grounds of the Hall.'* Although not illustrated in the HS, this detail below clearly indicates that Oak Flat is at least equal in size, if not slightly larger than the rest of the parkland to the N and NE of the Castle (within the RPG), and we do not feel that its importance has been adequately assessed when considering the impact of these major impositions on setting and significance as well as views of the new drive to and from the RPG.



Elvaston was originally listed in 1984, and at that time the OS Survey drawings were not digitised (not till 2010), so unless the EH inspector had been able to visit the British Library in person, the significance of Oak Flat was quite possibly unknown. Had they been easily available, we consider it very likely that the Oak Flat area may have been included within the RPG. The Heritage Statement states (3.32) that the new drive will be completely screened from the RPG. This is incorrect. Photo B shows a view E from the bridleway to Alvaston where the new access will pass R to L in front of the hedge/trees along the far side of the fields. Photo C taken from the bridleway across the existing access to the castle shows that the proposed car park area is also clearly visible through the trees, which are not that dense. A similar view is available for some distance along this stretch of bridleway. Woodland areas W8 and W9 which lie within the 'Cricket Pitch knuckle', are described as *'young mature to mature'* and *'young mature'* respectively in the pre-development Arboricultural Report (ie mostly non historic woodlands) and both these areas are to be largely removed to accommodate the new road. We appreciate they will be replanted. The LVA has an indicative viewpoint (VP6) from in front of the Golden Gates towards this area. VP6 shows the view here as completely wooded and we would query whether this is a realistic representation, particularly as the images are with the trees in full leaf and given the felling required, and the time it will take for new

trees to grow. We would have expected the LVA to include a closer view-point from just below the cricket pitch out to Oak Flatt as the new drive is clearly visible from here as demonstrated by photo A.

Since the early 19th century the estate at Elvaston has been enclosed and inward looking, with occasional deliberate breaks in tree cover where the rural sweep of encircling farmland can be glimpsed. This sets it apart from many other more open designed landscapes where extensive views draw in surrounding land, making it appear as a seamless extension of the designed landscape. From the outside, trees mostly hid the segregated, private world of Elvaston. The new driveway and car park with their regular flow of traffic and people completely changes this static, secluded environment to a far more dynamic one. It alters this very important aspect of significance and the character of the landscape, diminishing the privacy of Elvaston's setting, both from inside and outside the RPG. It is also apparent that views from the west of the existing bridleway and permissive path approaching the RPG from Alvaston or Oak Flat will be much altered. The new access road will present a deleterious visual intrusion and the addition of new planting between the new access road and the parallel bridleway will obstruct the views to the west across Oak Flat from the bridleway changing the landscape character.

The LVA also fails to show any views from the Castle itself and elsewhere within the RPG from the west and north-west. For example, the former orchid house on the roof of the Castle, which is of particular heritage interest, would almost certainly have had a very clear view of not just the drive but also the new car parking area. Whilst the landscape around Elvaston is undeniably flat, views out from the RPG are far more common than the online documentation suggests.

The re-siting of the car park is the lynch pin of the proposals and we do not unquestioningly accept that visitors are unwilling to walk slightly further to get to the core buildings at Elvaston. Indeed, even now the central area is quite clearly the honey pot destination, and this will not change when the buildings are restored. We appreciate the problems with compaction around trees as visitors enter the site from the current car park, but this is arguably more a matter of long-term inaction rather than an insurmountable problem. The route to the existing car park through Thulston, Elvaston and Borrowwash, is already a rat run for motorists during rush hours and this will not change, even if traffic to Elvaston Country Park is mostly removed from the equation. We can see the attraction of the clock tower being a focal point as visitors enter the site from the new car park, and the use of Springthorpe Cottage as an information space and gathering point.

We will comment in due course on the proposals earmarked for Phase 2 of the project (mentioned within the Environmental Statement Vol 1) with reference to the conversion of the Dog Kennels into holiday accommodation with the addition of eleven chalets in the surrounding woodland.

Having highlighted the above concerns, we are also aware that there are no definite plans as yet for the current car park. We would not support development on this site which lies entirely within the RPG.

The Elvaston Castle and Gardens Trust website <https://www.futureelvaston.co.uk/current-projects/> (undated) states *'We are now developing a business plan which will support and explain the way in which the Masterplan will be delivered and managed to ensure that Elvaston is truly self-sustaining and able to achieve the economic, social and environmental impacts which underpin our work.'* We would have hoped that this business plan came before the Master Plan.

We would have liked to see some reference within the application documentation to the interim plans for the management of the historic gardens and landscape.

The application does not include a clear description of the significance of the RPG and the contribution made by its setting, and has therefore failed to assess the true impact of the proposals on the RPG. The GT/DHGT suggest that until the omissions highlighted above are addressed, it will not be possible to determine the application.

Yours sincerely,

Margie Hoffnung
Conservation Officer

See Photos A, B & C on next page



Photo A - view WSW from near the SE corner of the cricket ground where the new access route follows the fence line from L to R towards the parked car.



Photo B - View E from bridleway to Alvaston; new access will pass R to L in front of hedge/trees along far side of fields



Photo C - view N from bridleway across existing access to Castle; car park site clearly visible through trees from a good stretch of this bridleway