



Historic England

Ms Rachael Simpkin
High Peak Borough Council
PO Box 136
Buxton
SK17 1AQ

Our ref: P01591896

16 May 2025

Dear Ms Simpkin

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**1-2 BUCKINGHAM HOTEL, BURLINGTON ROAD, BUXTON, DERBYSHIRE SK17
9AS**

Application No. HPK/2025/0158

Thank you for your letter of 30 April 2025 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Buckingham Hotel is an undesignated heritage asset contributing positively to the character and appearance of the Pavillion Gardens and Serpentine Walks Conservation Area (Buxton Conservation Areas Character Area 4) and its significance. Further, the setting and significance of the Grade II* Pavillion Gardens Registered Park and Garden (RPG) is clearly and positively contributed to by this building. The scheme is for the demolition of the Buckingham Hotel and its replacement with a replica building. Historic England considers the proposed demolition will cause harm to the significance of the conservation area and to the significance of the registered park and garden, which gains significance from its historic townscape setting. This proposal would result in the total loss of the undesignated heritage asset.

Historic England raises concerns with the proposed demolition and strongly encourage the Local Planning Authority to assure themselves they have sufficiently explored all avenues for the retention of this building, in full or in part. The total loss of this undesignated heritage asset will cause a moderate to high level of less than substantial harm to the character and appearance of the conservation area and significance of the registered park and garden. It is unfortunate to see that no alternative options have been submitted in the intervening period from our previous consultations, despite the advice which has been given.

Advice has been provided for previous proposals on this site on 22nd July 2021, 30th September 2020, 15th May 2019, 3rd September 2018, 27th June 2016 and 14th July



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2016. Alongside this, pre-application advice has also been provided on 22nd December 2017, 2nd March 2018 and 26th March 2018.

Historic England Advice

Significance:

The site of the proposed scheme lies within the Pavillion Gardens and Serpentine Walks Conservation Area and within the setting of Pavilion Gardens, a Grade II* registered park and garden.

In circa 1779 the development of Buxton as a spa town began in earnest when the 5th Duke of Devonshire conceived the idea of making Buxton into a second Bath and employed John Carr to take on the main projects including the Grade I listed Crescent. The dominance of the Devonshire family is clearly seen in the street names within the town, including that of Burlington Road. Prolific expansion continued into the 19th century and the popularity of Buxton as a visitor attraction grew with the advent of the railway and station which opened in 1863. Hotels and lodging establishments were built to facilitate the growing numbers of visitors.

Within this part of the conservation area, the 19th century expansion is reflected in the surviving historic townscape and buildings along Burlington Road and St John's Road. The former was laid out by 1879 and landscaped with gardens and woodland walks. As shown on map regression, the Buckingham Hotel site was the first to be developed with other establishments being constructed along St John's Road, taking advantage of the close location to the gardens and Pavilion leisure facilities. The Pavilions Gardens became a public park which probably originated as the private gardens of Buxton Hall in the 17th century and was laid out in 1871 to designs by Edward Milner incorporating part of an existing early to mid-19th century layout as the Serpentine Walks, by Joseph Paxton for the sixth Duke of Devonshire.

The setting of the gardens includes the 18th and 19th century townscape, including the Buckingham Hotel, and there is a direct historic relationship between the recreational use and enjoyment of the gardens with the surrounding town. This persists today and the experience and understanding of the gardens is enhanced by the survival of the historic townscape and built form. The Buckingham Hotel was purpose built as two semi-detached small hotels or lodging houses dated 1876. No.1 to the north as called Rockavon House and No.2 Buckingham House. At a later date the buildings became one hotel. Architecturally, the building is characteristic of its use and displays typical Victorian features and proportion with generous bay windows. It was built of local sandstone with slate roof and dressed stone detailing - characteristic of Buxton itself. The building is positioned at the corner of St John's Road and Burlington Road and forms part of a group of buildings along these streets.

The hotel makes a positive contribution to the significance, character and appearance of the Pavillion Gardens and Serpentine Walks Conservation Area. This lies in its evidential, historic and architectural value as forming part of the 19th century expansion



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of Buxton as a visitor destination and as a good example of Victorian townscape and architectural form. Accordingly, it is integral to the significance, character and appearance of the conservation area. The Buckingham Hotel, in its prominent location, also makes a clear positive contribution to the setting and significance of the Grade II* registered park and garden. The Buckingham Hotel is also an undesignated heritage asset in its own right.

Impact:

The proposal is for the total demolition of the Buckingham Hotel and the erection of a new aparthotel as a replica of the current building. The existing boundary and car park will be retained as well as the strong tree boundary to St John's Road, which contributes greatly to the setting of the site, the street and the registered park and garden.

Historic England advise the total loss of the building will cause harm to the significance of the conservation area and the registered park and garden. The latter gains part of its significance from its townscape setting, of which Buckingham Hotel forms part of. The building is an undesignated asset, it is an example of the history of Buxton as it developed into a popular spa town. This was at a time when there was an escalation in the construction of hotels and lodging houses to capitalise upon the surge in tourism throughout the 18th and 19th centuries. Its contribution is not just to the conservation area, but also to the architectural history of the town with its loss affecting the wider context and history of Buxton.

In terms of the registered park and garden, direct views between the two assets are not fully achieved due to the existing trees, but there remains a strong direct visual relationship between them. This adds to the experience of visitors to the gardens, but it extends to how the townscape is engaged with and the understanding of the relationship between Burlington Road and St John's Road with the Pavilion Gardens. The proposed loss of the hotel is not considered to preserve and enhance the setting of the registered park and garden, nor the character and appearance of the conservation area.

We appreciate that the appeal decision for the hotel affects the situation on site and retention of the building. Nevertheless, our position has been consistent regarding the proposed demolition, and we are concerned with the harm it will cause to the assets identified and which, in NPPF (National Planning Policy Framework) terms, we consider would result in an overall moderate to high level of less than substantial harm to their significance.

In addition to this, it is noted several structural reports on the condition of the hotel have been submitted. Previous consultations were concerned that it was unclear if advised remedial works were carried out that may have alleviated issues with the condition of the building. It is unfortunate, if this were that case, that works could have been carried out which had the potential to mitigate or alleviate, in part or full, the condition of the building.

We urge the Local Planning Authority to assure themselves that all information has



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been robustly assessed and alternative options for remedial work to allow the retention of the building, in full or in part, have been suitably exhausted before demolition is considered.

Regarding the proposed viability, our previous comments remain relevant. It is recommended the Local Planning Authority should critically assess both the viability figures presented and their underlying methodology, using appropriately qualified professional expertise.

The proposed replacement building is evidently designed as a mock version of the historic building. There are key differences, primarily the dominance of the new rear extension and its rationalised appearance into one larger elevation rather than two less dominant, individual extensions. This will affect the mass of the new building. We remain concerned with the proposed loss of the historic building, despite the efforts to improve the design of the replica structure.

If a replacement building is pursued, we strongly advise the Local Planning Authority to ensure they have a design of high quality. There is the potential for a proposal so similar in appearance to result in a building of a lesser quality due to choice of materials, design and detailing. The supportive information states the intention to salvage materials from the original building, this is positive and should be encouraged, including fabric which can be repaired. However, the use of existing materials should also be used in conjunction with traditional skills, particularly the stone coursing, to ensure any replacement building is of sufficient quality. These comments do not equate to consideration the proposed demolition of Buckingham House is supported.

Policy:

We refer you to the statutory requirement of Section 72 to pay special attention to the desirability of preserving and enhancing the character or appearance of the conservation area within the Planning (Listed Building and Conservation Areas) Act 1990 which must be considered when determining this application by your authority. The guidance of the NPPF (National Planning Policy Framework) is relevant here. Paragraphs 10 and 11 state the presumption in favour of sustainable development, and the means of achieving it (paragraph 8) are within three objectives, economic, social and environmental; in this case, environmental is relevant as it includes the protection and enhancement of the built and historic environment.

It is important to be conscious of heritage assets being an irreplaceable resource that should be conserved for the enjoyment of existing and future generations, including buildings of local historic value (Paragraph 202). There should be a desirability to sustain and enhance the significance of heritage assets, and any new development should make a positive contribution to local character and distinctiveness (Paragraphs 203 and 210).

The significance of heritage assets affected by proposals, including development which affects the setting of heritage assets, should be identified and assessed, with this being considered when assessing the impacts of proposed schemes (Paragraph 208). Further, great weight should be given to the conservation of heritage assets



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regarding impacts of any new development, and this is irrespective of the degree of harm (Paragraph 212). Clear and convincing justification should be provided where any harm to or loss of significance is proposed (Paragraph 213); in the case of less than substantial harm, this should be weighed against public benefits (Paragraph 215). Additionally, development which directly affects non-designated heritage assets will require balanced judgement regarding the degree of harm and the significance of the heritage asset (Paragraph 216). The proposed loss of a building which positively contributes to the significance of Conservation Area should be treated as either substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, with the significance of the area affected and its contribution to the significance of the Conservation Area as a whole considered (Paragraph 220). Any new development proposed within Conservation Areas and the setting of heritage assets should be an opportunity to enhance or better reveal their significance (Paragraph 219). Developers should record the significance of heritage assets proposed to be lost (Paragraph 218). Finally, it is encouraged that development reflect local design policies and government guidance on design, with significant weight given to designs which do reflect these policies and guidance, outstanding or innovative design, or improving the standard of design in the area; where this is not achieved development should be refused (Paragraph 139).

We refer you to the guidance within Historic England GPA 2: Managing Significance in Decision-Taking in the Historic Environment and Historic England GPA 3: The Setting of Heritage Assets, which along with the NPPF, recognises the important contribution setting makes.

Position:

Historic England has concerns with the proposed application due to the proposed demolition of the non-designated heritage asset Buckingham Hotel which contributes positively to the character and appearance of the Pavilion Gardens and Serpentine Walk Conservation Area and the setting and significance of the Grade II* Pavilion Gardens RPG.

We urge the Local Authority to ensure they have explored all opportunities for the retention of Buckingham Hotel, in full or in part, with all options for remedial work having been considered. Furthermore, the robust assessment of the structural reports has been carried out and the viability figures and methodology are suitably assessed. It is for the Local Authority to determine if the harm to the heritage assets is outweighed by public benefits, including the assessment of the viability figures. We reiterate how unfortunate it is alternative options have not been forthcoming following previous engagement and that potential remedial works to the structure may not have been carried out. It is disappointing the solution may lead to the demolition of a building which contributes positively to the conservation area and setting of a highly graded asset.

If the demolition of Buckingham Hotel is pursued, the Local Authority should consider the suitable recording of the building should be carried out and made publicly



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available.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 203, 208, 210, 212, 213, 215, 216, 218, 219 and 220 of the NPPF. As well as reference made to paragraphs 8, 10, 11 and 139.

In determining this application you should bear in mind the statutory duty of section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Molly Edwards

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Inspector of Historic Buildings and Areas



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