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Nathaniel Lichfield & Partners
Planning. Design. Economics.

Jane Curley
Planning Department
Staffordshire Moorlands District Council
Moorlands House
Stockwell Street
Leek
Staffordshire Moorlands
ST13 6HQ

14 Regent's Wharf
All Saints Street
London N1 9RL

020 7837 4477
london@nlpplanning.com

nlpplanning.com

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Your ref

Dear Jane

SMDC: Planning Application for Full Planning Permission for the Meadow Landscaping Works at Alton Towers Resort

On behalf of Alton Towers Resort, a company forming part of Merlin Attractions Operations Ltd, please find enclosed an application for planning permission for proposed landscaping works on 'field O' of the meadows including draining and regrading of land and the creation of bunds and structural landscaping, at the Alton Towers Resort. This covering letter sets out the background to the proposed development, the nature of the proposed works and the details of the enclosed application documents.

The planning application comprises the following:

1 Completed and signed planning application form and Certificate B;

2 Planning Application Drawings (see list at Schedule 1 of this letter);

3 Planning and Heritage Statement (within this cover letter), prepared by Nathaniel Lichfield & Partners;

4 Archaeology Assessment, prepared by the Archaeological Research Services Ltd;

5 Landscape and Visual Impact Assessment, prepared by Nathaniel Lichfield & Partners;

6 Arboricultural Impact Assessment, prepared by Tree Heritage;

7 Phase 1 Habitat Survey, prepared by Baker Consultants;

8 Flood Risk Assessment, prepared by MLM; and

9 Transport Statement, prepared by John Taylor.

A cheque for **£1,690** made payable to '*Staffordshire Moorlands District Council*' to cover the requisite planning application fee is being provided directly by Alton Towers Resort Operations Ltd under separate cover. This fee has been calculated on the basis of a 'category 10' development

("The carrying out of any operations not coming within any of the above categories") where the fee is *"£195 for each 0.1 hectare of the site area, subject to a maximum in total of £1,690".* Based on the site area of 2.44ha, the planning application fee will be £1,690 in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Request and Site Visits)(England) Regulations 2012. There is no new floorspace being created as part of the planning application.

Site and Surroundings

Alton Towers Resort is operated by Merlin Entertainments Group. It is the UK's most popular and largest theme park, and is therefore an important generator of tourism. The Resort is also a major employer offering a range of permanent and seasonal contracts.

Alton Towers Resort is located in the Churnet Valley to the north of Alton Village, and is approximately 195 hectares in size. The main access to the site is from Farley Lane to the west of the Resort. In terms of levels, the main site is located on a plateau from which levels drop into surrounding valleys. There are extensive areas of woodland, particularly on the steep downward slopes of the southern and eastern boundaries. The woodland serves to screen the main part of the park's development from the surrounding area, although there are some limited distant views of the upper elements of the structures within the Resort, such as glimpses of parts of the Oblivion ride and existing roof structures (e.g. Hotel). The Resort is broadly rectangular in shape with an east west dimension in excess of 2km and a north south dimension of approximately 1km, albeit varying across the site. The nearest major urban areas are Stoke on Trent, approximately 19km (12 miles) east of the park, and the City of Derby, 29km (18 miles) to the east.

Alton Towers Resort is an established theme park containing a range of rides, attractions, overnight accommodation and ancillary facilities. The resort contains 32 listed buildings and a Scheduled Monument (Bunbury Hillfort). The gardens at Alton Towers Resort are listed Grade I on the Register of Parks and Gardens. In addition the Resort is located within the Alton and Farley Conservation Area. Abbey Wood and Park Banks are identified as 'Sites of Biological Importance' and 'ancient woodlands'.

Beyond the Alton Towers Resort boundary are two SSSIs; Dimmingsdale is located to the west and is approximately 1km from the development site and Saltersford Lane Meadow is located to the south of the development site and is approximately 1km from the development site.

The application site is located on 'field O' within the meadows area at the north of the Alton Towers Resort (ATR). The application site is part of a wider area that is used for temporary overflow car parking under Permitted Development Rights (28 days per annum) and has been for many years. The existing meadows, including 'field O', suffer from existing depressions which cause wet sports during consecutive days of rain, making safe parking and vehicular movement difficult in the overflow fields.

The site is located on a 'Site of Biological Importance' and within the Alton and Farley Conservation Area. The site, together with fields M, N and P, are designated as 'overflow parking areas' within the Churnet Valley Masterplan, and to be used for a maximum of 28 days per year under Permitted Development Rights (PDR).

Proposed Development

The application proposes to create an unobstructed grass field which can be better utilised for temporary parking and to enhance visual screening at this part of the meadows via additional structural landscaping. In particular the proposals will involve the following works:

- Draining of wet spots on field O;
- Placement of soil to regrade the land and remove existing depressions which cause wet spots during consecutive days of rain. Levels to change gradually from zero to two metres across the site. The soil to infill the land will be sourced from within the Park, as part of the SW8 works.
- Creation of bunds (approx. height of 3.5 metres - plus landscaping) and structural advanced landscaping to the north and east to create a tree belt to enhance visual screening

These landscaping works are proposed in accordance with the Long Term Plan for the Resort, which identifies the meadows area for phased implementation of a landscape cell parking area, which would take place within the context of the advanced structural landscaping works. In the longer term, as identified in the Long Term Plan, ATR would like to use the meadows site for parking on additional days per year (i.e. beyond the current 28 day limit). The location for the wider works has been indicatively identified on drawing ref. 373-97-2 as Phase 2 and 3 and a separate application will be sought for these works in due course.

Planning Assessment

The Statutory Development Plan currently comprises the Core Strategy (CS, adopted March 2014). The Churnet Valley Masterplan – Supplementary Planning Document (March 2014) is also a material consideration in the determination of planning applications at the site.

Alton Towers is identified within the Core Strategy as being within the Churnet Valley, an area identified for sustainable tourism and rural regeneration. The promotion of new tourism opportunities within the Churnet Valley area and at Alton Towers Resort is supported by Spatial Strategy SA3 'Encouraging a strong, prosperous and diverse economy' and Core Strategy Policy SS7 'Churnet Valley Area Strategy', CS Policy E3 'Tourism and Cultural Development' and the Churnet Valley Masterplan. Spatial Strategy Policy SA3 seeks to develop and diversify the economy in a sustainable manner. The accompanying text identifies strong support for the growth of existing businesses and specifically mentions the need to provide support and opportunities for the growth and expansion of major employers such as Britannia Building Society, JCB and Alton Towers which are central to the delivery of a thriving economy.

CS Policy SS7 supports the sensitive expansion of existing tourist attractions and facilities, such as Alton Towers, and the provision of compatible new tourist attractions and facilities. Development should be of a scale and nature and of high standard of design which conserves and enhances the heritage, landscape and biodiversity of the area and demonstrates strong sustainable development and environment management principles. Furthermore, it states that the consideration of landscape character will be paramount in all development proposals in order to protect and conserve locally distinctive qualities and sense of place and to maximize opportunities for restoring, strengthening and enhancing distinctive landscape features.

CS Policy SS7 requires that further development at Alton Towers Resort is considered against the guidance set out in the Churnet Valley Masterplan (2014). A Long Term Plan, with supporting technical studies, has been prepared by Alton Towers Resort. This sets out Alton Towers Resort's plans for the next 10 years and identifies the lower meadows for 'addition parking with advanced structural landscaping and new planting'. In line with the aspirations of the Long Term Plan, the Churnet Valley Masterplan sets out a Concept Plan for Alton Towers Resort which identifies a number of zones within the Resort and within these zones, measures which are considered appropriate subject to further detail.

The Concept Plan identifies the meadows site as being located within Zone 11, which is designated as an *"Area of Sensitivity/ Limited Development Potential"*. Zone 11 of Alton Towers Development Strategy requires *"Any potential future development must be sensitive to the historic parkland and biodiversity of the area including where necessary provision of off-site mitigation of the SBI as well as on site enhancement and management."*

Principle of Development

The application proposes landscape enhancement works to create a cellular area, designed to be suitable for parking and to be concealed from views beyond the Resort. Consistent with the site's overall use as a theme park, the proposals will support the successful operations of Alton Towers Resort and are in accordance with Alton Towers Resort development zones identified in the Churnet Valley Masterplan (2014). The proposed landscape works would therefore be acceptable in principle.

Heritage and Conservation

Below Ground Heritage

An archaeological assessment was undertaken by the Archaeological Research Services Ltd which confirms that due to the limited nature of the groundworks associated with the scheme (i.e. the excavation of a drainage trench) the majority of the application site would be preserved beneath the imported soil, and therefore no archaeological evaluation or mitigation works would be necessary.

Above Ground Heritage

The application site is located within the Alton and Farley Conservation Area but otherwise has no other heritage designation in relation to designated or non-designated heritage assets. The designated heritage assets within the Alton Towers Resort (including listed buildings, a Scheduled Monument and Registered Park and Garden) are located some distance from the site. As identified in the Landscape and Visual Impact Assessment (LVIA), there would be no views of the planting from within the rest of the Alton Towers Resort outside of the meadows (although there may be some views from the main approach road). The long distance views included within the LVIA illustrate that some of the designated heritage assets within the site (most notably Alton Towers and the Flag Tower) would be visible within the views of the proposed development. Due to the nature of the proposals and the distance of these views it is considered that any impact on the setting of these heritage assets would be negligible. Therefore, the consideration of the effects of the proposed development on heritage assets primarily relates to the direct impact on the character and appearance of the Alton and Farley Conservation Area. Details relating to the

Conservation Area, included in the Council's Conservation Area Appraisal, are contained in the LVIA. The Conservation Area is predominantly of architectural, archaeological and historic significance. In the Planning (Listed Buildings and Conservation Areas) Act 1990, Section 72 requires the Local Authority to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas within their area.

The Archaeological Statement accompanying the application includes historic maps. These date back to 1775 and illustrate that the application site has historically been parkland/fields; the 19th/20th century OS mapping suggests that the site may have historically featured trees.

The proposals relate to a very small part of the Conservation Area and although the addition of tree planting within the site would remove part of its open character, the site is in close proximity to trees and the wider Alton Towers site includes a significant amount of woodland as well as a Registered Park and Garden. Therefore, the character of this part of the Conservation Area includes green historic spaces and the introduction of planting to a small area would not affect this. View ML1 in the LVIA shows that there would be no negative effect on this view identified in the Council's Conservation Area Appraisal (Map 8). Furthermore, the other views in the LVIA highlight that the tree cover from the proposed planting would obscure some of the car parking which takes place in the meadows under Permitted Development Rights; this would have a positive effect on views into the Conservation Area. Therefore, the character and appearance of the Conservation Area and its significance would be preserved.

Landscape and Visual Impact Assessment

A Landscape and Visual Impact Assessment (LVIA) has been prepared by NLP to assess the landscape and visual effects of the proposed tree planting in car park O in the meadows which is used for overflow car parking under Permitted Development Rights. As trees are a characteristic or in-keeping feature in the landscape and views identified it would mitigate against any of the small loss of the meadows in the landscape and views. As car parking would sometimes feature in views and on the landscape on the site, the proposed tree planting would help to minimise views of this in this area.

In terms of landscape character effects, the proposed development would have a minor beneficial effect on the receiving character area and a nil or negligible effect on the other character areas; in all cases the effects would be beneficial. The loss of open meadow would be mitigated by the planting of trees and screening of some of the overflow car parking.

The visual assessment has shown that the proposed development would have a beneficial effect on all the representative views. This is because the introduction of trees into the views would be in-keeping with the character of the views. Although views of part of the open meadows would be lost in many of the views, the screening the trees would provide for some of the overflow car parking on the site would mitigate against this loss. The proposed trees would not block any key features of amenity in the views at the 3m growth level illustrated in the visuals.

Overall, the proposed new planting would not result in any materially adverse effects on landscape character or representative views. The proposed development would comply with local policy, in particular, Core Strategy Policies: SS1 as it would maintain the distinctive character of the Staffordshire Moorlands; SS7, E3 and DC1 as the proposals would be of a scale and nature that would conserve the landscape of the area and be compatible with its character; DC3 as it would

not be harmful to the character of the local and wider landscape or important views and would respect local landscape character and R1 as it would not harm the rural character of the area.

Ecology

The proposed development site is situated within the Alton Park SBI, which is designated for being a wood pasture with veteran trees. Field O is situated within grassland, and contains no mature or veteran trees. This field predominantly consists of regularly mown species-poor semi-improved grassland.

Baker Consultants has carried out an Extended Phase 1 Habitat Survey of the site in October 2016 to assess the site for areas of ecological value, and to identify the presence or likely absence of protected or notable species and habitats. Following on from the initial survey, a badger survey and a Habitat Suitability Index for great crested newts was carried out on 25 January 2017 to provide further information for Phase 1 of the proposals.

The ecology assessment found that the botanical interest within this area is considered to be of low value, and whilst the proposals will have a direct adverse impact on the grassland of the site area through the draining of the marshy areas, this will be a temporary impact, and the site will be returned to grassland. The assessment also confirmed that the proposals would have no impact on features such as park land veteran trees or habitats within the depression areas, and the planting and landscaping proposals will give the opportunity to increase nesting and foraging habitat for bats and birds.

With regards to protected species, the habitat survey confirmed that no potential bat roosting features are present within Field O, but there are roosting opportunities elsewhere within the survey area and it is likely that bats will forage within Field O, particularly along the north and south boundaries. Overall, no adverse impacts are anticipated towards foraging bats as a result of the proposed works to Field O.

With regards to birds, the habitat survey found that the grassland within Field O provides limited opportunities for ground nesting birds and due to regular mowing, this is considered to reduce the suitability even further and no adverse impacts are anticipated towards nesting birds as a direct result of the proposed works to Field O. Suitable nesting habitat is however present to the south of Field O in the woodland habitat.

The ponds to the west of the site were surveyed in 2016 and returned a negative result for Great Crested Newts (GCN). The pool within the meadows is approximately 70m to the northwest of the application site and is considered to have low suitability for breeding GCN.

No badger signs were located within Field O and no setts were found within 50m of Field O. However, precautionary measures during the construction phase are recommended to prevent foraging animals to be at risk from injury.

In conclusion, the results of the Phase 1 habitat survey show a number of features surrounding Field O that have the potential to support protected species including bats, breeding birds, badgers and GCN and the Phase 1 Habitat Survey sets out a number of recommendations to protect these habitats and species. The survey confirms that the landscaping proposals to Field O will avoid adverse impacts towards these features and therefore the proposals will be sensitive to the biodiversity and ecological value of the area in accordance with the Churnet Valley Masterplan (Zone 11).

Trees and Landscaping

There are no existing trees located within the application site, but the site is surrounded by woodland along its southern and northern boundary. An Arboricultural Impact Assessment (AIA), including a tree survey, has been undertaken by Tree Heritage, which is submitted as part of this application. The AIA confirms that the proposed landscaping works have been designed to avoid any impact to the RPA of the surrounding trees and therefore the proposals would be acceptable from an arboricultural perspective.

As identified on drawing ref. 373-97-4 additional landscaping is proposed to enhance visual screening at this part of the site from distant views. The impact of the proposed landscaping was assessed as part of the LVIA and has been discussed earlier in this report.

Transport and Parking

A Transport Statement has been prepared to assess the proposed operational and construction impact of the proposed works.

As outlined above, the meadows area (field O, N and M) is currently used by ATR as a temporary overflow parking for 28 days under PDR. The majority of use is during October and November for Scarefest and Fireworks when weather conditions can make movement and parking safely difficult in the overflow fields. The proposed landscaping works will enable the overflow car park to be more suitable for car parking and will provide dryer access for vehicles and pedestrians. The proposals will not result in an increase in visitor numbers and parking arrangements will be in accordance with the existing arrangements within the Resort.

With regards to the construction impact of the proposals, the proposed spoil to regrade the land and remove existing depressions will be obtained from within the Resort (as part of the SW8 works) and will not impact on the highway network. Areas on site will be allocated for the storage of equipment and hardware and there will be no need for any off site provision. Alton Towers Resort has vast experience of managing these types of projects with minimal impact on local highways or traffic movements.

In summary, there will not be any additional traffic generated by the proposed works and the proposals will create a more suitable area for temporary car parking and will enhance the visitor experience when the overflow car park has to be used. All construction traffic will be within the Resort. On the basis of the above, the proposals would be acceptable from a highways and transport point of view.

Flood Risk and Drainage

A Flood Risk Assessment has been prepared by MLM Consulting Engineers. The assessment confirms that the application site is located on Flood Zone 1 described as having less than a 0.1% annual probability of fluvial or tidal flooding. The site is also located in low risk of flooding from surface water on and off site, and from water bodies and ground water.

The existing site is greenfield land and the existing surface water drains via a combination of infiltration and surface water run-off. The proposed works will retain this permeable landscaped surface with no hard paving or formal parking / access arrangements. As there is no impermeable area (existing or proposed), the proposals do not include a formal drainage system, but it is proposed to create a land drain along the southern end of the site. There is no intention to connect

drainage from the site into any watercourses or sewer systems. As such, proposed discharge rates will remain the same as the existing greenfield run-off rate and therefore there is no requirement for flow control restrictions or attenuation features as the draining of the site will be in line with the current scenario. On the basis of the above, the FRA confirmed that the proposals will not increase the risk of flooding on or off site and would be acceptable.

Conclusion

In summary, the application proposes landscape enhancement works to create a cellular area, designed to be suitable for parking and to be concealed from views beyond the park. Consistent with the site's overall use as a theme park, the proposals will support the successful operations of Alton Towers Resort and are in accordance with Alton Towers Resort development zones identified in the Churnet Valley Masterplan (2014). The technical assessments submitted to support the application confirm that the proposed landscaping works will be sensitive to the historic parkland and biodiversity of the area.

We trust the enclosed application documents are sufficient to enable the application to be validated and look forward to receiving your decision as soon as possible. In the meantime, if you have any questions please do not hesitate to contact me or my colleague Hannah Whitney.

Yours sincerely

Timea Nacsa
Planner

Copy Neil Walker – Merlin Attractions Operations Ltd. (Alton Towers Resort)

Nathaniel Lichfield & Partners
Planning. Design. Economics.

Schedule 1 – List of Application Drawings

Drawing Title	Drawing Reference
373-97-1	Site Location Plan
373-97-2	Phasing with Planting and Viewlines
373-97-3	Site Plan as Existing
373-97-4	Site Plan as Proposed
373-97-10	Site Sections as Existing
373-97-11	Site Sections as Proposed