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Stockwell Street
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Staffordshire Moorlands
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Date: 22 February 2017
Our ref: 03224/IR/TN/13398324v1
Your ref:

Planning Portal ref. PP-05849382

Dear Jane

SMDC: Application for Minor Material Amendments to planning permission ref. SMD/2016/0315 - New path at SW8 ride

On behalf of Alton Towers Resort, a company forming part of Merlin Attractions Operations Ltd, please find enclosed an application seeking Minor Material Amendments (under Section 73 of the TCPA 1990 as amended) to planning permission ref. SMD/2016/0315 (dated 31/08/2016) to incorporate an amended path and additional landscaping in association with the approved SW8 ride at Alton Towers Resort. The original planning application for the SW8 ride was approved for the following works:

“Demolition of existing structures and the installation of a new rollercoaster, construction of associated buildings, landscaping and groundworks at the Alton Towers Resort”

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 Heritage and Planning Statement, prepared by Lichfields – set out within this letter;
- 4 Arboricultural Impact Assessment, prepared by Tree Heritage;
- 5 Archaeological Statement, including Work Protocol, and a Written Scheme of Investigation, prepared by Archaeological Research Services.

A cheque for £195, made payable to ‘Staffordshire Moorlands District Council’ to cover the requisite planning application fee for a Minor Material Amendment application is being provided directly by Alton Towers Resort Operations Ltd under separate cover.

Proposed Amendments

Alton Towers Resort wish to install an amended woodland path to the south of the approved SW8 ride to assist with guest flow during the construction phases of the new ride and to also act as a relief path during peak days at the Resort. As shown on the proposed site plan ref. 373-95-7B, the amended path is proposed to

be located to the north of the Deer Park Wall (DPW), which is a non-designated heritage asset, and is surrounded by a number of trees.

Over time the DPW has been buried in this area and is currently overgrown by a number of trees and vegetation and is not visible from paths at this part of the Park. As part of the proposals, the ground surrounding the DPW is proposed to be graded down to 1:3 to reveal the wall to the same extent as elsewhere at the Resort.

The proposed works will involve the widening of an existing pathway and the laying of a new east-west path that will link two existing path ways. The path is proposed to be made of pavement blocks to the north of the DPW (a minimum of 1m away from the DPW). This amended woodland path along the DPW will also enable visitors to better appreciate the DPW as part of the history of the Alton estate.

In addition, to facilitate the amended path, it is proposed to re-route one of the approved paths (to the east of Theming Envelope 1 and to the north of the DPW). The two paths are proposed to be enhanced with additional indigenous understorey and woodland edge planting (area shaded in green on the proposed plans) to increase visual screening.

Pre-Application Advice

Pre-application advice was sought from SMDC in early February 2017. SMDC confirmed that the proposed amendments would need to be dealt with via a Section 73 application. It was also confirmed that any future application would need to be accompanied by further information to address any potential impact on trees and the Deer Park Wall.

Informal pre-application advice has also been sought from SMDC's Tree Officer and the County Archaeologist and their advice is set out below in the relevant sections.

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.

The proposed small-scale amendments have been reviewed in the context of the relevant planning policy context and are considered to be acceptable in principle. Consistent with the site's overall use as a theme park as well as the previous SW8 consent for a new ride, the proposed small scale alterations will assist with the successful management and operations of Alton Towers Resort. The information submitted to support the application confirms that the proposed works will be sensitive to the historic parkland and will have no harmful impact on surrounding trees or the locally listed Deer Park Wall.

Above Ground Heritage

Alton Towers and its gardens lie in the centre of the Conservation Area which also includes Farley Hall and hamlet to the north and Alton and Alton Castle to the south. Alton Towers Resort occupies the former deer park. Within the site, immediately to the south of the approved SW8 ride is a locally listed Deer Park Wall and beyond this is a wooded area that continues southwards to the more formal Alton Towers Gardens. The proposals are also located within the boundary of the Grade 1 Registered Park and Gardens and 'Ancient Woodland'.

The Deer Park Wall, which demarcates the boundary of the former deer park (in which the Alton Towers Resort is constructed), is considered an undesignated heritage asset for its historic importance as an element of the Alton estate.

As identified within the Heritage Impact Assessment submitted for the original application (ref. SMD/2016/0315), the closest listed building to the development site is the former Stables Building (Grade II), located approximately 18 metres from the nearest boundary of the development site but around 45 metres from the proposed new ride itself. To the south west of the Stables is the Grade II listed retaining wall which forms the northern boundary to the boating lake – now part of the Mutiny Bay attraction. 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 and to the setting of the locally listed DPW. The Conservation Area is predominantly of architectural, archaeological and historic significance. The trees in this area are also considered to be an important element of the Conservation Area as well as the Registered Park.

The proposed path alterations relate to a very small part of the Conservation Area and located in close proximity to the locally listed DPW and within the Registered Park and Garden. The proposed amended path will be consistent with the approved woodland paths as part of the SW8 application and the introduction of additional landscape planting will preserve the character and appearance of the Conservation Area, which at this part of the Resort includes the approved SW8 ride and boundary to woodland vegetation.

The proposed works to install the modified woodland path would be sensitively located in relation to the locally listed DPW and will allow it to regain some of its significance as a feature of separation between the Garden and the Park.

Considered against the statutory provisions in the Act, the proposal would at least preserve, but also enhance the character and appearance of the Conservation Area and the Registered Park and Garden. The significance of all of the designated heritage assets would be conserved. Similarly, the settings of the heritage assets would be preserved.

Archaeology

Pre-application advice was sought from SMDC's Principal Archaeologist who has reviewed the proposals and advised that an archaeological watching brief would be an appropriate response to mitigate for any potential impacts upon archaeological remains associated with the Deer Park Wall. In addition, the officer recommended that a work protocol should also be prepared to ensure the protection of the DPW during all works associated with the SW8 scheme.

A Written Scheme of Investigation (WSI) to discharge condition 7 has been submitted to and approved by SMDC on 20th February 2017. In line with feedback received from the County Archaeologist and in accordance with the approved WSI for the SW8 scheme (under discharge of condition application ref. DOC/2016/0109), an Archaeological Watching Brief has been prepared by the Archaeological Research Services (ARS) which sets out the objectives and methods to be employed when carrying out the proposed works in close proximity to the DPW.

We also note that details submitted to discharge condition 9 (measures to protect the DPW during demolition and construction works) were approved by SMDC on 15th February 2017. As requested by the County Archaeologist, a Work Protocol has also been submitted as part of this MMA application to set out additional measures to protect the DPW during works associated with the amended proposals.

Trees and Landscaping

Tree Heritage has reviewed the proposals in detail and has prepared a Tree Statement to accompany this MMA application, which should be read in the context of the Arboricultural Impact Assessment prepared for

the original SW8 application. The proposals have also been discussed with SMDC's Tree Officer at his recent site visit in January 2017.

The Tree Statement confirms that the paths have been carefully sited to avoid any harmful impact to the RPA of the surrounding trees and the proposals will result in no additional tree loss.

The proposed area of works is proposed to be enhanced with additional indigenous understorey and woodland edge planting to increase visual screening. This is set out on the accompanying landscaping drawing and landscape schedule (ref. 373/95-18B and 373/95-8B)

SW8 Conditions

The original SW8 planning permission was subject to a number of conditions. We note that the majority of the pre-commencement conditions has been submitted to and approved by SMDC (ref. DOC/2016/0109), which should be reflected in the wording of any future S.73 planning permission. The below table provides a summary of the status of the conditions:

Condition	Status of condition	Effect of S.73 application
Condition 1 (Implementation)	Compliance	N/A
Condition 2 (List of Drawings)	Compliance	Wording of condition should be updated to refer to the amended drawings submitted as part of this S.73 application.
Condition 3 (Materials)	Condition is to be discharged prior to installation.	
Condition 4 (Drainage)	Discharged on 20 th December 2016	Wording of condition should be updated to refer to the approved details
Condition 5 (Ecology)	Compliance	N/A
Condition 6 (Scheme of Lighting)	Condition to be discharged prior to commencement of use.	
Condition 7 (Archaeology)	Discharged on 20 th February 2017	Wording of condition should be updated to refer to the approved details. It should also be updated to refer to the Archaeological Statement, Watching Brief and Work Protocol submitted as part of the S.73 application.
Condition 8 (Management Plan for the DPW)	Discharged on 15 th February 2017	Wording of condition should be updated to refer to the approved details
Condition 9 (Measures to protect the DPW during construction and demolition)	Discharged on 15 th February 2017	Wording of condition should be updated to refer to the approved details.
Condition 10 (CMP)	Discharged on 20 th December 2016	Wording of condition should be updated to refer to the approved details.
Condition 11 (Noise)	Compliance	N/A
Condition 12 (Contamination)	Compliance	N/A
Condition 13 (Temporary Tree Protective Fencing)	Compliance	Wording of condition should be updated to refer to the Arboricultural Statement submitted as part of the S.73 application.
Condition 14 (Tree Protection Measures)	Partially discharged with respect to the demolition phase on 12 th January 2017. Further information to be provided during construction.	Wording of condition should be updated to refer to the approved details and identify what information needs to be approved for the construction phase (trigger to be agreed).
Condition 15 (Details of	Partially discharged with respect to	Wording of condition should be updated to refer

Condition	Status of condition	Effect of S.73 application
structures and operations within RPAs)	the demolition phase on 12 th January 2017. Further information to be provided during construction.	to the approved details and identify what information needs to be approved for the construction phase (trigger to be agreed).
Condition 16 (Tree Planting)	Compliance	Condition wording should be updated to refer to the revised landscape plan and planting schedule submitted as part of this S.73 application.

Conclusion

In summary, the application proposes to install an amended woodland path and additional planting to assist with the construction and operation of the approved SW8 ride. Consistent with the site's overall use as a theme park as well as the proposals approved under the SW8 permission, 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 information submitted to support the MMA application confirm that the proposed works are small scale in nature and will be sensitive to the historic parkland and will have no harmful impact on surrounding trees or the locally listed Deer Park Wall.

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 Nacsá
Planner

Copy Neil Walker – Alton Towers Resort

Schedule 1 – List of Drawings

Drawing Title	Approved under SMD/2016/0315	To be approved under S.73 application
Location Plan	373-95-1	No Change
Block Plan Existing	373-95-2	No Change
Block Plan showing protection felling & demolitions	373-95-3	No Change
Block Plan Proposed	373-95-4A	373-95-4B
Site Plan Existing	373-95-5	No Change
Site Plan showing protection felling & demolitions	373-95-6A	No Change
Site Plan Proposed	373-95-7A	373-95-7B
Landscape Plan	373-95-8A	373-95-8B
Planting Schedule	373-95-18A	373-95-18B
Site Sections AA BB Existing	373-95-10	No Change
Site Sections AA BB Proposed	373-95-11A	No Change
Site Sections CC DD Existing	373-95-12	No Change
Site Sections CC DD Proposed	373-95-13A	No Change
Site Sections EE FF Existing	373-95-14	No Change
Site Sections EE FF Proposed	373-95-15A	No Change
Site Sections GG HH Existing	373-95-16	No Change
Site Sections GG HH Proposed	373-95-17A	No Change