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Date: 02 February 2018

Our ref: 03224/IR/MLa/15250477v5

Planning Portal ref: PP-06642430

Dear Jane

SMDC: Planning Application for Full Planning Permission to Install Lighting at the Perimeters of Car Park J, Alton Towers Resort

On behalf of Alton Towers Resort, a company forming part of Merlin Attractions Operations Ltd, please find enclosed an application seeking planning permission for the proposed installation of lighting within 'Car Park J', located in the east of 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 documents:

- 1 Completed and signed planning application form and Certificate B;
- 2 Planning application drawings (see list at Schedule 1 of this letter);
- 3 Letter regarding potential impact on bats, from Baker Consultants;
- 4 Arboricultural Report and Tree Condition Survey, prepared by Ruskins Tree Consultants;
- 5 Car Park J Illuminance Information, prepared by eosDesign Ltd

£936 will be paid to Staffordshire Moorlands District Council over the phone by Alton Towers Resort to cover the requisite planning application fee. The fee has been calculated on the basis of a full planning application ("*other operations (not coming with any of the above categories)*") in accordance with the Town and Country Planning (Fees for Applications, Deemed Applications, Request and Site Visits) (England) Regulations 2012 (as amended, January 2018). As the site is 0.35 hectares in size, the planning application fee should be £234 for each 0.1 hectare ($£234 \times 4 = £936$). There is no new floorspace being created as part of this application.

Site and Context

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 (ATR) is located in the Churnet Valley to the north of Alton Village on a site of approximately 195 hectares. The main access to the site is from Farley Lane to the west of the Resort. 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.

ATR 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 ATR 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' and the Resort is also located within a Special Landscape Area.

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.

Background

The application site is located north of the Phase 1 lodge development 'The Enchanted Village', at the eastern edge of ATR. The application site (known as Car Park J) is comprised of an area of hardstanding (tarmac) which is used as a car park which serves the lodges at 'The Enchanted Village', and will also serve Phase 2 of the lodge development (as approved by planning permission ref. SMD/2016/0040). The car park can be accessed via a one-way internal road which enters the car park at the north-western section, and exits at the south eastern corner of the car park. Car Park J provides 254 spaces for hotel/lodge guests.

The site is approximately 0.35 hectares and is located within the Alton/Farley Conservation Area. Car Park J is also bordered by a belt of small to medium sized trees. The proposals have been submitted in order to ensure the safety of guests visiting the 'Enchanted Village' and the future Phase 2 lodges, and to enhance pedestrian access.

Proposed Development

The application proposes to install 33 directional LED lights around the perimeter of Car Park J (including one light on existing grassed landscape area). The LED lights will be mounted on 4m high posts that linked by electricity cables in an underground duct around the perimeter of the car park. The lights will come on at dusk by photocell, and turn off by a timer at midnight. There are no trees proposed to be removed as part of this development. Small excavations (800mm below ground) will be made for the posts. The proposed lighting will be Ansell Carina with a warm white LED. The posts will be 140mm in width at the base, and 76mm in width at the upper section.

These works are proposed in accordance with the Long Term Plan for the resort, for which its key aims are implementing car park improvements and increasing/maximising overnight stays at the resort. There have been numerous concerns raised directly from guests of the 'Enchanted Village' in relation to the lack of lighting in Car Park J during the evening/night-time hours. The proposals will immediately address this concern, and ensure pedestrian safety.

Planning Assessment

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

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.

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 car parking improvements as a key aim. Additionally, maintaining a family appeal and enhancing the overnight accommodation is a priority of the Long Term Plan. In line with this 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 Car Park J as being located within Zone 10, which is designated as a '*New Development Area*', where there is potential for improved parking and hotel and lodge developments.

Principle of Development

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 use of the car park will remain the same and the proposed lighting will be in keeping with the existing character of the application site, enhancing access for pedestrians. The proposed lighting would therefore be acceptable in principle, subject to compliance with other material considerations (set out below).

Heritage and Conservation

Below Ground Heritage

Part of the application requires minor excavation works for the posts. The base of each post will be secured 800mm below ground level. The proposed excavations will be located in areas of the existing tarmac hardstanding, and as such no archaeological evaluation or mitigation works would be necessary, given the site has been highly disturbed through the construction of the car park.

Above Ground Heritage/Conservation

The application site is located within the Alton and Farley Conservation Area (a designated Heritage Asset) and a Special Landscape Area. Other designated heritage assets within the wider Alton Towers Resort (including listed buildings, a Scheduled Monument and Registered Park and Garden) are located some distance from the site. There will be no views of the proposed lighting outside of Car Park J (although there may be limited illumination just outside the application site). Due to the nature of the proposals and the distance between Car Park J and the heritage assets within ATR, there will be no negative impact on such assets. 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. 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 trees/planting around the perimeter of Car Park J will limit the impact on wider views into the Conservation Area. The proposals relate to a small part of Alton and Farley Conservation Area which is used as a tarmac car park. The character of this use will remain unchanged, although the installation of lighting will alter the evening appearance of the site when viewed from the immediate surroundings, through the provision of improved lighting. However, given the urban appearance of the car park it is considered that the character and appearance of this part of the conservation area will be preserved.

Should officers consider that the lighting results in less-than-substantial harm. The NPPF identifies that there is a requirement that *“this harm should be weighed against the public benefits of the proposal...”* (NPPF Paragraph 134).

As set out further below, the proposed works will enhance safety and security for guests and the lighting scheme has been sensitively designed. It is therefore considered that any harm to the conservation area is outweighed by the wider benefits to Alton Towers guests visiting the site.

Visual Amenity and Safety/Security

Overall, the proposed new lighting would not result in any materially adverse effects on landscape character or representative views beyond the parks boundaries. 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.

Since the ‘Enchanted Village’ has been occupied by guests (from spring 2015), Alton Towers has received numerous concerns from guests about the lack of lighting at Car Park J, and the associated safety implications. The Core Strategy aims for a strong tourism economy and safe/well-maintained and appealing places. The granting of this planning application would help to support these aims, and improve the experience for ATR guests.

Ecology

Car Park J is an area of hardstanding bordered by trees (of generally limited ecological quality) and is also close to the ancient woodland which borders the eastern and southern boundaries of ATR.

Baker (Ecological) Consultants' letter dated 13th December 2017 confirms that seven bat species have been recorded across ATR and within close proximity to the application site; including two taxa, namely long brown-eared bat *Plecotus auritus* and *Myotis* species, which are classified as 'light averse'. A common pipistrelle *Pipistrellus pipistrellus* bat roost may also be present south-west of Car Park J. The southern treeline of Car Park J found the highest bat activity level.

It states that Interim Guidance (2014) provided by the Bat Conservation Trust advises that the emittance of artificial light within foraging and commuting areas used by light-adverse species should be kept to a minimum – ideally less than 1 lux in the wooded areas. The letter also explains that the proposed lighting scheme is in accordance with this guidance as the illuminance levels of the woodland areas will remain low – an average of 0.19 lux, with a maximum of 0.63 lux. The lights will also be turned off after midnight.

Overall, the letter confirms that no adverse impacts are anticipated in regard to foraging bats as a result of the proposed works at Car Park J. As such, the proposals will be sensitive to the biodiversity of and ecological value of the area.

Trees and Landscaping

An Arboricultural Report and Tree Condition Survey have been submitted as part of this application. The application site is surrounded by small to medium sized trees including Sycamore, Beech and Scots Pine. The report states that the tree resource growing in proximity to Car Park J is of limited quality, with the majority of trees being ivy clad, self-set pioneer species which have not been subject to any recent management. The trees generally have a low/moderate amenity value from the public realm. No trees are to be removed to facilitate the proposed works.

The report concludes that the proposed works will not impact on the health and stability of the nearby trees, and is therefore acceptable from an arboricultural perspective. Nevertheless, prior to works commencing, the specification and construction methodology for all works will be reviewed by the Arboricultural Clerk of Works and a detailed Arboricultural Method Statement will be prepared for the onsite contractor.

Conclusion

In summary, the application proposes new lighting along the perimeter of Car Park J, 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 lighting will be sensitive to the historic parkland, character of the conservation area and biodiversity of the area. The proposals will also reduce health and safety risks at the car park and will be sensitive to the visual amenity of the surrounding ATR.

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.

LICHFIELDS

Yours sincerely

Maddie Lane
Planner

A handwritten signature in black ink, appearing to read 'Maddie Lane', with a large, stylized flourish at the end.

Copy Warren Critchley (Alton Towers)
 Janet Gurr (Alton Towers)

Schedule 1

Drawing Title	Drawing Reference
Site Location Plan/Key Plan (1:2500 or 1:5000)	373/98 - 1
Existing Site Plan (1:250 or 1:500)	373/98 - 3
Proposed Site Plan (1:250 or 1:500)	373/98 - 4
Proposed Block Plan (1:500 or 1:1000)	373/98 - 2
Proposed Floodlight/Lamp Post Elevations (1:15)	3194-E-200-P