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Date: 28 February 2018 **Our ref:** 03224/IR/MLa/15464905v2 **Planning Portal ref:** PP-06752753

Dear Jane

SMDC: Application for accommodation pods and associated works at Alton Towers Resort (phase 2 lodges)

On behalf of our client, Alton Towers Resort, a company forming part of Merlin Attractions Operations Limited, please find enclosed an application for the development of 102 'pods' with associated service core buildings, shower, toilet and changing facilities, reception building, hard and soft landscaping, parking and drainage works at Alton Towers Resort.

The application comprises the following documents:

- 1 Application Form
- 2 Application Drawings, prepared by NBW and The Manser Practice (see Schedule 1 of cover letter)
- 3 Design and Access Statement, prepared by The Manser Practice
- 4 Ecological Assessment, prepared by Baker Consultants
- 5 Arboricultural Assessment, prepared by Tree Heritage
- 6 Flood Risk, SUDs and foul drainage Assessment, prepared by Simpsons
- 7 Services and Energy Strategy, prepared by Elementa
- 8 Transport Assessment, prepared by John Taylor
- 9 Operational Assumptions, prepared by ATR
- 10 Noise Assessment Report ISSUE rev2.4', dated March 2016 and Technical Note dated 19 February 2018, prepared by Cahill Design Consultants
- 11 Landscape and Visual Impact Assessment, prepared by Lichfields and NBW
- 12 Heritage Statement, May/December 2015 and letter dated 8 February 2018, prepared by Archaeological Research Services

A cheque for **£9,240** made payable to Staffordshire Moorlands District Council will be hand-delivered by Merlin Attractions Operations Ltd to cover the Council's application fee.

Site and Context

Alton Towers Resort is the UK's most popular and largest theme park, making it an important generator of tourism. The Resort is also a major employer offering a range of permanent and seasonal contracts. To continue to attract visitors and meet their diverse demands the Resort must continuously refresh its facilities. In turn this will allow Alton Towers Resort to continue to encourage visitors to lengthen their stay at the site and remain competitive both nationally and internationally.

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 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.

Relevant Planning History

Planning permission for Phase 1 of the lodge development (the Enchanted Village) was granted on 22 May 2014 (Ref. SMD/2014/0107). This comprised 61 double lodges (122 keys), 10 tree houses, a restaurant, servicing facilities and associated works. The Enchanted Village permission has been implemented and the development opened in 2015. It has been fully constructed with the exception of 5 of the tree houses and the restaurant extension which are to be completed at a later date. The average stay at the Enchanted Village is 1.33 nights, with an occupancy rate of 84% in 2017.

Planning permission for Phase 2 of the lodge development was granted on 27 April 2016 (Ref. SMD/2016/0040). The proposals were for the construction of 35 double lodges which were subdivided into two separately accessed units (35.1sqm GEA per standard lodge). Each lodge would measure 8m by 9m with a height of approximately 4m (with the wheelchair accessible units being 8m by 10m and a height of 4m). The lodges were designed to be in keeping with the design of Phase 1, with a timber and stonework finish with feature chimneys and timber fencing surrounding the terrace. In association with the lodges, the planning permission scheme included a reception building, three service buildings, a service core building, tipis for entertainment space, cellar extension with water tank, a storage area and a network of internal roads and pathways to the lodges. The permission has yet to be implemented but remains extant until April 2019

A planning application has been submitted (and is currently undetermined) for the installation of LED lighting at the perimeters of Car Park J (Ref. SMD/2018/0050). These lights would be mounted on 4m high



posts, and will come on at dusk by photocell, and turn off by a timer at midnight. The proposed lighting would ensure pedestrian safety for the visitors parking in Car Park J and accessing the lodge and pod developments.

Background

The application site is located north-west of the implemented Phase 1 lodge development 'The Enchanted Village', at the eastern edge of ATR. It is located east of the existing Alton Towers Hotel and currently comprises maintained grass used for overflow car parking. The application site is well screened to the east and southern boundaries of the resort by woodland and to the north by a bank of trees.

The site covers an area of 1.88 hectares and is located within the Alton/Farley Conservation Area. The proposals will form an extension to the current 'Enchanted Village' and increase multi-day visits. Since the opening of the Phase 1 lodge development (Enchanted Village) in spring 2015, market research has shown that there remains a demand for additional lodge style accommodation but that this demand is for smaller, more basic accommodation units. For this reason a fresh planning application has been submitted seeking planning permission for smaller pods.

The proposals outlined in this letter aim to meet this demand, and enable Alton Towers Resort to be accessible to a broader range of people. The subsequent increase in overnight stays at the Alton Towers Resort from the implementation of this planning application will encourage visitors to prolong their stay in the local area, contributing to the growth of the local economy.

The Proposals

The proposed development comprises 102 single pods. The dimensions of the pods will be 2.4m x 4.8m, with a small decked area outside the entrance doors. Each pod is designed to sleep up to four people - with one double bed and two singles. The pods will be a height of 2.6m and will cover a total area of 10sqm GEA per pod. The layout of the proposed pods has been designed to form clusters around individual landscaped areas and as shown on the application drawings are much smaller in area and height than the previously approved lodges.

The pods have been designed to be in keeping with the Phase 1 lodges. They are proposed to be finished in Siberian larch, with galvanised brimet roof tiles and timber window frames and doors. The pods are too small to be able to provide fully accessible accommodation and Alton Towers will therefore ensure that any disabled guests wishing to book an accessible pod will be automatically upgraded to an accessible lodge in phase 1.

In association with the pods, the proposed development includes the following features:

- 1 A reception building will be located towards the north of the site, south of the main car park, and adjacent to the main access route to the development from the car park. The reception building will have a total floorspace of 30sqm (GEA) and a pitch roof to assist guests in identifying their check in location. The reception will only be used by phase 2 guests as the existing Enchanted Village lodge guests will continue to check in at the Crooked Spoon.
- 2 Two changing room/shower buildings will be located towards the centre of the site. These facilities will be used by visitors staying at the pods. One block comprises 125sqm GEA and the other comprises 150sqm GEA. The buildings will include WCs, showers and changing facilities and will be serviced from a water tank which is proposed to the south east of the site. The buildings will be finished in Waney Edge Timber with synthetic grass roofs.

- 3 To the south east of the site a service area is proposed which will include a back of house area for staff and will include two staff buildings. The first of these buildings, the green room (37sqm GEA), will be used as a welfare area/locker facility for staff and will be constructed for the opening of the pods (phase 2.1), whilst the second building will comprise a later phase (phase 2.2) and will be used as changing room facilities for the entertainment team (comprising 29sqm GEA). Both buildings will be finished in Waney edge timber with synthetic grass roofs.
- 4 As with the previously approved scheme a Village Centre is proposed to the south of the site, which will include tipis as entertainment space for the visitors with landscaping to the south and an area of synthetic grass where the spaces will be more heavily used by guests. The tipi structure has a total internal area of 253sqm and consists of fabric material over a timber structure. The tipis are open-sided and will not be firmly closed at any time. Accordingly, the tipis are not considered to constitute floorspace. The entertainments team will be hosting events in the tipis, with a curfew of 6pm to limit potential noise. The tipis were installed in November 2017 as a temporary measure and currently remain on site. To the south of the tipis mobile food and beverage units will be parked on site when the pod development is open to guests. These are mobile units that don't require planning permission, but their location is shown on the drawing for information.
- 5 An arcade building is proposed to the south of the service core. This will form phase 2 of the scheme (phase 2.2) and will provide indoor games accommodation for guests. This will comprise 61sqm.
- 6 A network of internal roads and pathways to the lodges will enable visitors to safely move through the development. The development will be car park free.

A table below provides a summary of the proposed enclosed floorspaces in comparison with the extant permission:

Description of Building Phase 2.1	Total Area of Extant Permission (sqm GEA)	GIA per unit (sqm) – Current Application	GEA per unit (sqm) – Current Application	Total Area of Current Application (sqm GIA)	Total Area of Current Application (sqm GEA)
Standard Lodge	2316.6	n/a	n/2	n/a	n/a
	2310.0				
Accessible Lodge	152	Automatic upgrade to Phase 1 accessible lodge			n/a
Pod	n/a	8	10	816	1020
Reception Building	99	26	30	26	30
Service Buildings	80.4	n/a	n/a	n/a	n/a
Service Core	358	n/a	n/a	n/a	n/a
Staff Locker Room	n/a	33	37	33	37
Cellar Extension	19	n/a	n/a	n/a	n/a
Water Tank	15	10	11	10	11
Changing Facilities Building A	n/a	115	125	115	125

Changing Facilities Building B	n/a	125	150	125	150		
Phase 2.2							
Arcade	n/a	53	61	53	61		
Staff Changing	n/a	26	29	26	29		
Block							
TOTAL	3,040	-	-	1204	1,463		

As shown above the previously approved development comprised 3,040sqm of new buildings. The proposed pod scheme is significantly reduced in size comprising only 1,463sqm.

Landscaping and Car Park

As noted above the pods are much smaller in scale and will be incorporated within an extensive landscaping scheme to soften the appearance of the development and complement with the landscaping of the adjacent Enchanted Village development. This will include area of grass for use by pod guests and indigenous planting. Please see drawing ref. 373/99-6 and the Design and Access Statement.

Car Park J (an existing hard-surfaced tarmac car park) will remain primarily unaltered. The proposals include the tarmacking of a grass circle (located at the south-eastern section of Car Park J), and relining to show six disabled spaces. The overall number of parking spaces will alter slightly from 650 to 652 (including the disabled bays) as part of the proposals. The car park will be accessed from the south via a new internal road that will adjoin the existing internal road network. Car Park J is also subject to an undetermined planning application for the installation of lighting around its perimeters, which would enable visitors of the Enchanted Village and Phase 2 pod scheme to safely access it.

Phasing

The proposed development will be constructed in two phases. The initial phase will comprise all 102 pods, the reception building, the shower/toilet blocks, water plant and green room (phase 2.1). The arcade, and entertainment changing facilities will comprise the second phase of the scheme's implementation (phase 2.2).

Planning Assessment

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

The development of long stay visitor accommodation within the Churnet Valley area and at Alton Towers Resort itself is supported by CS Policy SS7 'Churnet Valley Area Strategy', CS Policy E3 'Tourism and Cultural Development' and the Churnet Valley Masterplan.

Notably, in accordance with CS Policy SS7 the Churnet Valley is identified as an area for sustainable tourism and rural regeneration and support is to be given to short stay and long stay visitor accommodation. Furthermore, the Churnet Valley Masterplan SPD (section 7.7.6) lists that an aim and objective of the Alton Towers Long Term Plan includes to 'increase/maximise overnight stays at the Resort'. The Churnet Valley Masterplan identifies improving the range of accommodation at Alton Towers as an opportunity to encourage overnight stays. In turn, the increase in overnight stays at the Alton Towers Resort will encourage

visitors from further away and prolong their stay in the local area. This will further support the local economy in accordance with CS Policy C₃ 'Tourism and Cultural Development'. The proposed development includes the provision of entertainment tents, this is in accordance with the Churnet Valley Masterplan SPD, which includes as part of the Long Term Plan to 'increase choice and extend the appeal of the resort beyond the core 'theme park' including developing evening entertainment options'. Accordingly, this will further assist in encouraging visitors to extend their stay.

The proposed development is also in accordance with Alton Towers Resort development zones identified in the Churnet Valley Masterplan (2014). The application site is located within Zone 10 which is designated as a 'new development area'. In addition, the development has given consideration to the tree coverage and the benefit of screening afforded by trees to the south and east of the Zone, and the nearby heritage assets in accordance with the requirements for development in Zone 10.

The key considerations for the proposed development are whether the proposals would affect the amenity of the surrounding area, the impact of the proposals on the wider Conservation Area and whether they will result in any adverse impact on the environment and trees. The proposals therefore need to be considered on their potential impact on the following:

- 1 Heritage Effects and Visual Impact
- 2 Residential Amenities
- 3 Economy and Employment
- 4 Trees
- 5 Ecology
- 6 Flood Risk

This letter will address the potential impact on these aspects in turn.

Heritage Effects and Visual Impact

The Alton and Farley conservation area has a varied character and appearance. It includes the Alton Towers estate with its major rides and theming as well as the villages of Alton and Farley. The application site is currently used for overflow car parking and existing views from within this part of the site are characterised by the two existing hotel developments and the development of the Phase 1 lodges.

The proposed Phase 2 pods development will add to the existing lodge accommodation at the Resort and will be themed in a sensitive way to complement the existing woodland setting of this part of the Resort. It will be seen within the context of the existing lodge development and Alton Towers Hotel at the site and, is smaller in scale to the previously approved lodge scheme. The proposed development is has been sensitively designed to respect the character of the conservation area. Overall, the careful design and landscaping of the development will ensure that the character of this part of the conservation area, an area characterised by hotel development, is preserved.

Alton Towers Resort contains a number of listed buildings, including the Grade II* listed Alton Towers, the Grade 1 Registered Park and Garden and a scheduled ancient monument. There is a statutory requirement to ensure that regard is given to the desirability of preserving a listed building and its setting or any features of special architectural or historic interest which it possesses. The application site is located some distance away from any listed buildings/structures or their settings, and is located outside of the Registered Garden.

This planning application is accompanied by a HIA and letter from Archaeological Research Services, which explains that the proposals have a smaller footprint than that of the previously approved scheme and the

associated support buildings are also smaller. Consequently, it is considered that the findings of the full HIA report (produced in 2015 for the extant permission) remain the same. It is recommended that close consultation should be undertaken with the Staffordshire County Council Principal Archaeologist so that suitable evaluation and/or mitigation can be agreed as appropriate.

In summary, there will be negligible impacts on the identified special architectural or historic features within the Alton Towers estate. Further liaison with the Principal Archaeologist from Staffordshire County Council will further establish any suitable mitigation works, if necessary.

With regard to the visual impact of the Phase 2 pods scheme, a Landscape and Visual Impact Assessment (LVIA) has been submitted alongside this application. The proposed development will be seen in the context of the existing Enchanted Village development and Alton Towers Hotels adjacent to the application site, and will benefit from a landscaping scheme that will assist in screening the development. The LVIA concluded that the effect on landscape character will be negligible. In addition, the screening from the existing woodland will mean that the proposals will not be visible, thus having no discernible effect on the key views.

Residential Amenities

The proposed pod development will provide additional overnight accommodation on site and low level play and entertainment which will not result in a significantly noisy environment. Indeed the proposals seek to create a natural and car free environment for guests to enjoy this unique part of the Resort.

The Noise Assessment which accompanies this compares the noise from the operational activities with the previous scheme assessment predictions. It identifies that operational transportation, car parking and building services noise are not expected to increase above those predicted previously, as a result of the revised proposals. Based upon increases in guest numbers, general guest activity noise levels may increase by 1 dB over and above those predicted previously, resulting in an overall increase of 2-3 dB. However, this increase would still be seen as a negligible increase over the long term.

The Transport Assessment identifies that there will be no adverse impacts on the local road infrastructure. The main users of the pods during peak period will be visitors to the resort who arrive during the day or in the evening when day visitors are leaving after spending a day at the Resort. The existing Staff Travel Plan, updated 2017, for the Resort will be extended to include the proposed development and any new staff will be encouraged to use alternative forms for transport to the private car, therefore minimising the number of employee vehicle trips to the site. There are therefore no valid reasons for refusing the proposed development at this site, on highway or transportation grounds.

Furthermore, the Landscape and Visual Impact Assessment identifies that the proposed development will not be visible from the surrounding key views and would result in a negligible impact on the landscape character and key views.

Accordingly, it is concluded that the proposed development will not adversely impact the residential amenity of nearby residents in terms of noise, traffic or visual impact.

Economy and Employment

Alton Towers Resort is operated by Merlin Entertainments. It is the UK's most popular and largest themed attraction and the only top ten visitor attraction in the West Midlands. It is also one of the largest employers in the District and contributes to the local and regional economy.

The proposed new development will further assist the resort in encouraging its visitors to stay at the park for a longer period of time and will meet the demand for additional accommodation at the site, in a unique form of development that will be particularly popular with families. This will enable the Resort to continue to be a

major employer and continue to benefit the local area through direct and indirect spending of its visitors. Alton Towers Resort estimates that approximately 35 part-time jobs will be directly created as a result of the proposed development. The pods development will only be opened seasonally, and therefore no full-time jobs will be created.

The proposed development will result in economic benefits, and accompanying reports identify that following the proposed mitigation measures the proposals will be acceptable in environmental terms. The proposals therefore accord with the Council's policies.

Trees

The Arboricultural Report identifies that the overall scheme will have very little impact on the trees at this site and there will be no direct loss of trees due to the scheme. It is however suggested that one tree, T1195 Ash, is removed due to its poor condition. The access from the car park through the trees to the reception building will be constructed using a "No-Dig" technique. The proposed internal pathways to the Pods are mainly constructed well away from any trees. There are two areas where the paths do encroach into the RPAs of trees T1008 and T1909 which are both Scots Pines. In these areas the paths will be constructed above the existing surface using cell-web or board walk to avoid any excavation. The surfaces will be porous and breathable and so there should be no adverse effect on these two trees. Given the mitigation measures proposed it is concluded that the prosed development will be acceptable in terms of trees and comply with Policy NE1 of the Core Strategy.

Ecology

The proposed pods development has been designed to incorporate a number of mitigation measures to minimise impacts on ecology and ensure biodiversity gains. The trees to the north and west of the site will be retained within the proposals, and lighting levels will be kept to a minimum so that the impact to bats is reduced. In addition to this, the lighting scheme will incorporate appropriate specifications to further reduce the level of artificial light being emitted by the scheme. Further to this, the Ecology Assessment suggests that bat boxes may be appropriate in areas where they are unlikely to be disturbed.

As part of the construction stage of the scheme, it is suggested that deep open excavations should be covered overnight to avoid potential impacts to badgers and other terrestrial wildlife. Additionally any construction works that might directly impact upon breeding birds will be carried out between September and February to avoid any potential disruption.

The ecology report concludes that the measures proposed will ensure that the requirements of planning policy and wildlife legislation will be fully met. As such the proposals are in accordance with Policy NE1 of the Core Strategy.

Flood Risk

The overall development site is located in Flood Zone 1, which is an area not considered to be at risk of tidal or fluvial flooding. The approved phase 1 surface water drainage network was designed to accommodate runoff generated from future development. A preliminary drainage design has been prepared, which ensures through the use of SUDS in the form of filter drains and a below ground geocellular storage tank, that there will be no increase to the rate or volume of surface water runoff discharged from the development in comparison to the existing situation.

With respect to foul drainage an existing 225mm diameter foul drainage spur located south of the phase 2 development was installed during the construction of the foul drainage serving phase 1 to accommodate anticipated future development flows. It is proposed to gravity drain foul water runoff via the allocated foul



drainage spur and phase 1 foul drainage network to the existing drainage system positioned south west of the site. There would be no alterations made to the existing pumping chamber, therefore, there would be no increase in peak flow levels discharged to the public sewer system. The FRA concludes that the proposals will result in no increase in the level of flood risk. The proposals therefore comply with Policy C3 of the Core Strategy.

Environmental Impact Assessment

Consideration has been given to the relevance of this application to the Town and Country Planning (Environmental Impact Assessment, EIA) Regulations (2017). The application site area measures 1.88ha and therefore exceeds the 0.5ha threshold for hotel complexes and theme parks for the Council to consider if the proposal will require an EIA.

The development has been assessed with regards to flooding, ecology, noise, visual impact, heritage impact and transport and we do not consider that it would give rise to potential significant environmental effects requiring an EIA. Consideration has also been given to the cumulative effects arising from the impacts associated with the proposed development and when the scheme is considered alongside any other developments in the surrounding area such as the Phase 1 lodges development and hotel extension.

The technical assessments have been prepared with consideration to these recent developments. Therefore any cumulative impact has been assessed as part of the planning application submission. Transport is considered to be the most likely cumulative impact. However, given that the development will provide additional overnight accommodation predominantly for guests who would already be visiting the site and will distribute traffic throughout the day, rather than concentrated at peak times, there will be no negative cumulative impact on traffic (noise and air quality). In addition, these developments were assessed and considered acceptable as part of the Long Term Plan and the previous phase 2 lodge planning permission. As such, cumulatively there will be no potential significant environmental effects.

Conclusion

The proposed development will complement the existing accommodation offer at Alton Towers Resort and will enhance the visitor experience of the Enchanted Village. The scale and nature of the proposed development is similar that of the extant permission for the lodge Phase 2 scheme on the same application site (ref. SMD/2016/0040). The pod development has also been designed to correspond to the character, scale and appearance of the existing Enchanted Village.

The proposals are acceptable in terms of economic benefits, residential amenity, heritage conservation and impact on the natural environment. As evident from the planning assessment, the proposal will preserve the character and appearance of the conservation area and will have a negligible impact on landscape character as the proposed development will not be visible from beyond the Resort boundary. Overall the development is in accordance with the relevant local planning policies and will constitute further economic development to the area through the provision of jobs and additional direct and indirect spending within the local economy.

We trust that we have provided you with sufficient information to enable the application to be validated, and subsequently approved. If however you have any questions please do not hesitate to contact me or my colleague Hannah Whitney.



Yours sincerely

Maddie Lane Planner

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Janet Gurr Michael Mercer-Cox Andy Nichols Chris Jeffcoate Alton Towers Resort Merlin Entertainments Nichols Brown Webber LLP The Manser Practice

Schedule 1: Application Drawings

Drawing Title	Drawing Reference	
Site Location Plan/Key Plan (1:2500 or 1:5000)	373/99 - 1	
Existing Site Plan in Context (1:500 or 1:1000)	373/99 - 2	
Existing Site Plan (1:250 or 1:500)	373/99 - 4	
Existing Car Park Plan (1:250 or 1:500)	373/99 - 8	
Proposed Site Plan (1:250 or 1:500)	373/99 - 6	
Site Plan showing Constraints in Context (1:500 or 1:1000)	373/99 - 3	
Site Plan showing Constraints (1:250 or 1:500)	373/99 - 5	
Proposed Car Park Plan (1:250 or 1:500)	373/99 - 9	
Site Sections AA BB CC DD Existing (1:250 or 1:500)	373/99 - 16	
Site Sections AA BB CC DD Proposed (1:250 or 1:500)	373/99 - 17	
Site Sections EE FF GG HH Existing (1:250 or 1:500)	373/99 - 18	
Site Sections EE FF GG HH Proposed (1:250 or 1:500)	373/99 - 19	
Accommodation Pods - Plans and Elevations (1:20)	1386_501	
Reception Building – Plans and Elevations (1:50)	1386_502	
Changing Facilities Building A – Plans and Elevations (1:50)	1386_503	
Changing Facilities Building B – Plans and Elevations (1:50)	1386_504	
Staff Building (Green Room) – Plans and Elevations (1:50)	1386_505	
Water Tank – Plans and Elevations (1:20)	1386_506	
Tipis – Plan and Elevation (1:50)	1386_507	
Arcade – Plans and Elevations (1:50)	1386_508	
Staff Changing Room – Plans and Elevations (1:50)	1386_509	
Themed Entrance Portal & Wireless Access Points– Plans and Elevations (1:100)	1386_510	