SMYTHEMAN
ARCHITECTURAL

Heritage Statement

Alton Towers, Alton: Proposed installation of 2 No. of Junior drop towers and alteration to existing landscaping.

SMD/2018/0793

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1.0 Introduction

1.1 This Heritage Statement has been prepared by Smytheman Architectural in support of an application for Full Planning Consent submitted to Staffordshire Moorlands District Council. This is commissioned on behalf of Merlin Entertainments. This appraisal has been carried out to assess the impact of a proposal in a localised area of the Alton Towers theme park resort, a historic park and garden within a Conservation Area. The appraisal is concerned with the process of conserving the special architectural and historic character of the area and minimising any impact a proposal has.

1.2 This appraisal has been conducted in accordance with the general guidelines set out in British Standard 7913:2013 'Guide to the Conservation of Historic Buildings' and Historic England publications 'Informed Conservation' and 'Conservation Principles, Policies and Guidance' and in particular responds to policies outlined in the National Planning Policy Framework (NPPF). In respect of information requirements, it sets out that:

"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance."

1.3 Local level planning policy for Alton comes from Staffordshire Moorland District Council, hereafter abbreviated to 'SMDC'. Planning policy comprises the 'Staffordshire Moorlands Core Strategy'.

1.4 The author Bruce Johnson is an Architectural Designer with over 10 years' experience working with historic buildings. He has studied an MSc Degree in Building Conservation & Regeneration at the University of Central Lancashire and a BSc in Architectural Technology accredited by the Chartered Institute of Architectural Technologists.

1.6 A site survey and visual inspection was carried out in December 2018. Background research was conducted with reference to the interactive planning service, historic mapping databases, archived material, and through discussions held with the applicant. The assessment of the proposals will be conducted with reference to a range of texts, particularly the Historic England good practise guides and local authority's appraisal of conservation area.

2.0 Site Location & Site Information

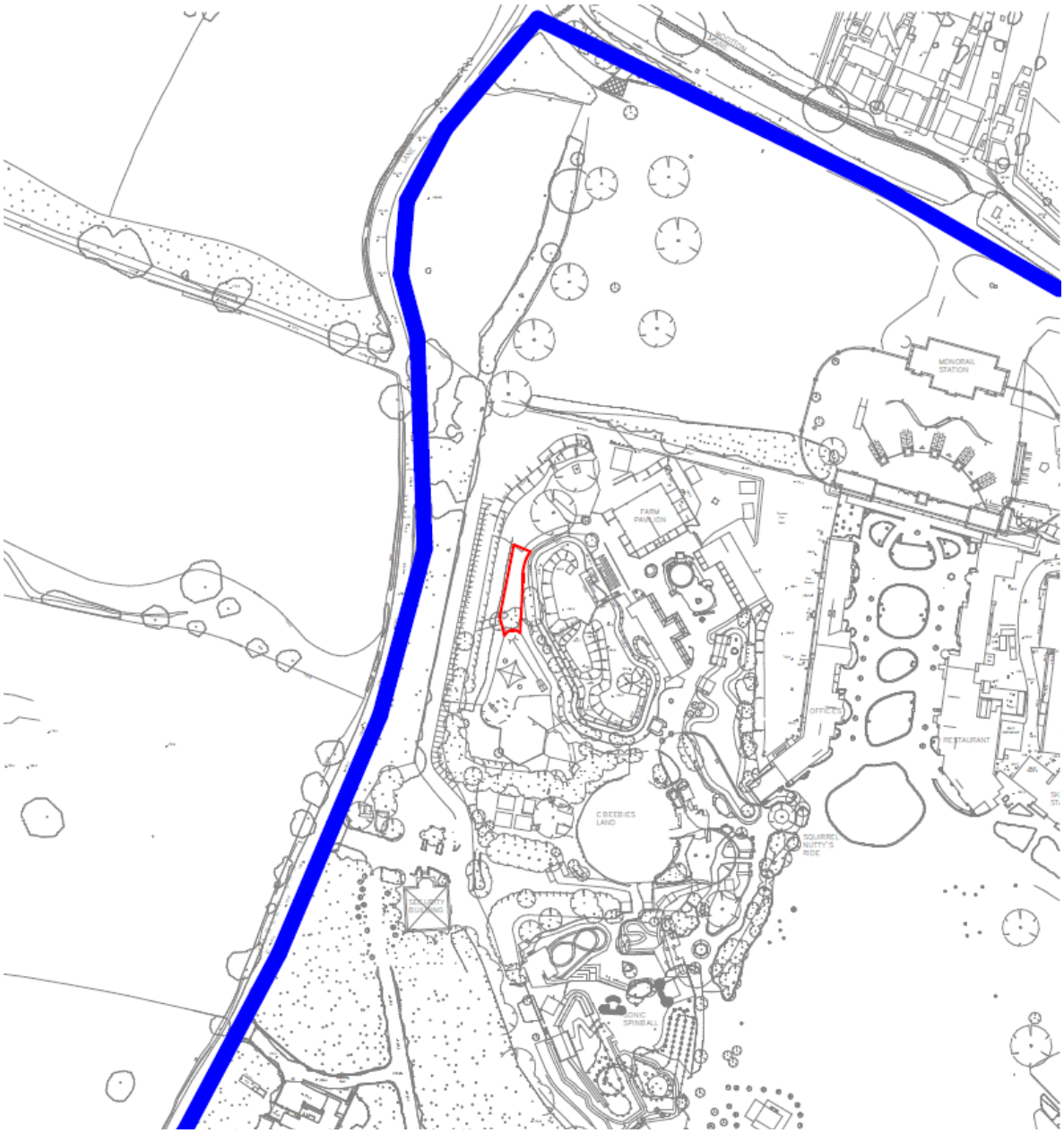


Figure 1: Extract from Ordnance Survey by Smytheman Architectural, see drawing Ref. ATHH-SA-XX-XX-DR-A_0102. The site edged in Red and other land owned by the applicant edged in Blue.

2.1 Alton Towers Resort is located at National Grid Reference - SK 07150 43716.

2.2 The proposed site comprises a narrow long plot to the edge of the Alton Towers Resort site. To the North the site is close to the main 'public entrance' and a large parking hardstanding. To the West boundary a copse of trees shields the site from the highway; Farley Lane, to the immediate East there is a park 'service road' whilst to the South there is the 'staff and

goods entrance' and security buildings. Further and wider to the South and East is the 'CBeebies' area of the resort. The proposed site has a footprint of approximately 250m^2 (2,691 ft^2).

2.3 There are currently 14 Conservation Areas within the area covered by the Staffordshire Moorlands Local Planning Authority. These are designated at Alton and Farley, Bagnall, Biddulph Grange, Caldon Canal, Caverswall, Cheadle, Checkley, Cheddleton, Endon, Horton, Ipstones, Leek, Stanley and Upper Tean. The site lies within the Alton and Farley boundary. See Section 4.0.

3.0 Heritage Asset Description

3.1 Alton Towers Resort is itself a Grade I listed historic garden, designated by Historic England. Within the garden, there is a number of scheduled ancient monuments and listed buildings of varying significance.

3.2 The Resort also falls within the the Alton and Farley conservation area boundary.

3.3 Clearly, as a modern day theme park attraction, these historic structures and monuments must sit alongside new attractions, service roads, operational buildings and public realm. It is this use that ensures the continued conservation and maintenance of the heritage assets, the key with all new development has been to look to *"avoid, minimise and mitigate the impact on the heritage asset".*



Figure 2: A modern day aerial view of Alton Towers (Google.2019) the site is indicated by a Red edged oval. Note on the further Historic Maps overleaf that the proposal is a significant distance from any of the truly valuable historic garden areas, buildings or ancient monuments.

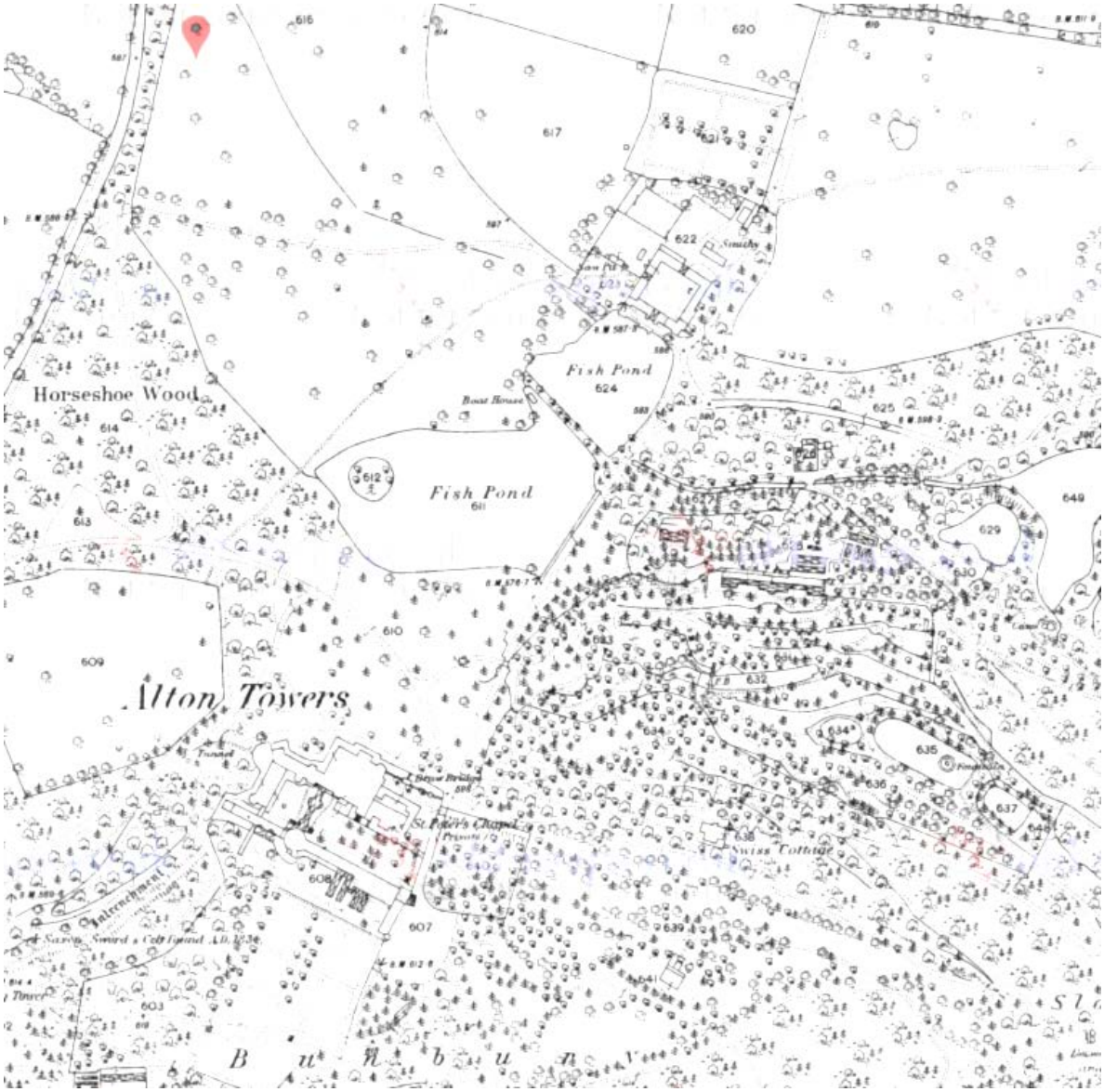


Figure 3: Historic Ordnance Map from 1881 (above) demonstrates the historically significant areas of the Alton Towers site. The Proposed site for alteration is indicated by the Red marker to the North West.

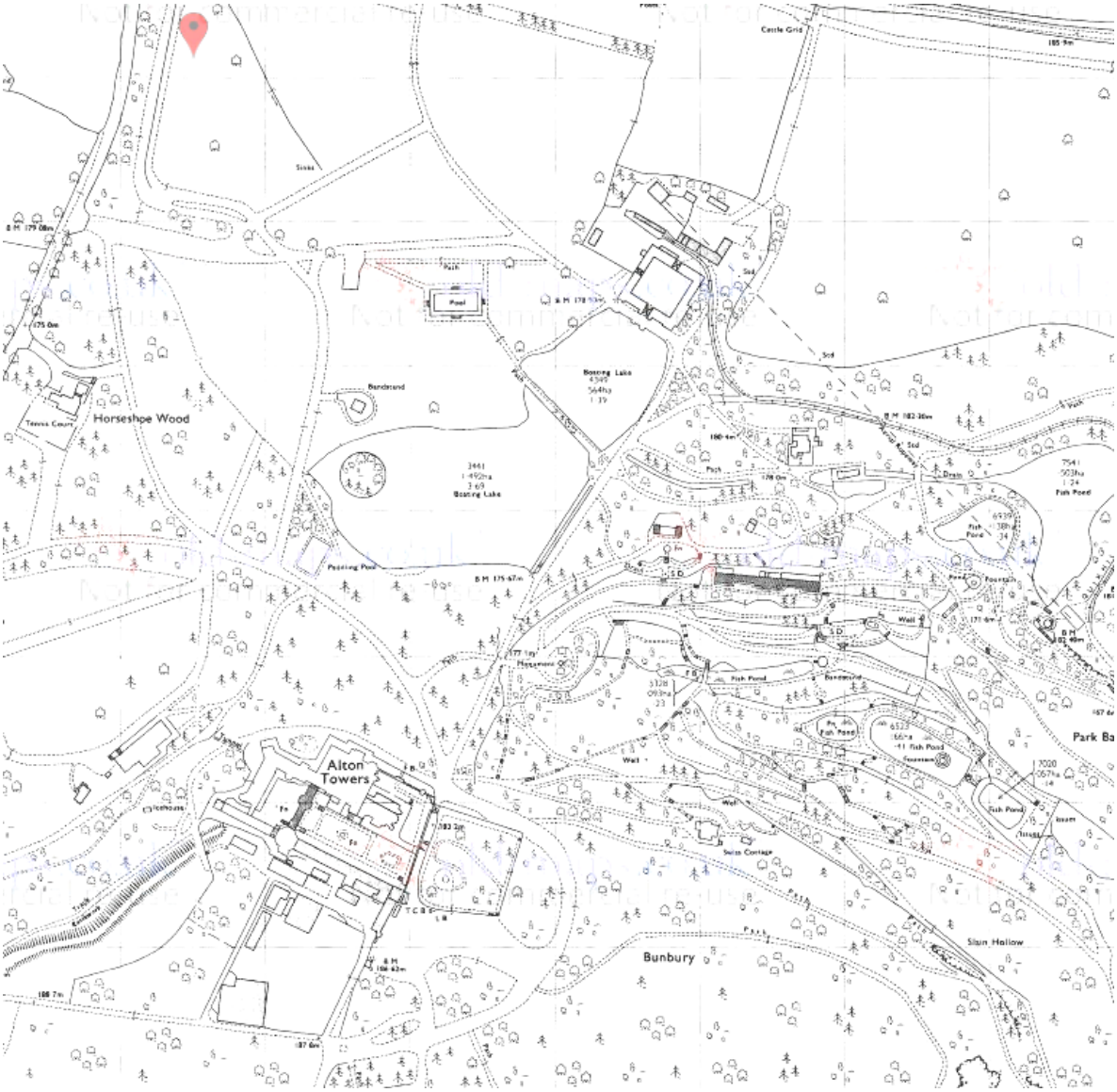


Figure 4: Historic Ordnance Map from 1970 (above) demonstrates the historically significant areas of the Alton Towers site. Alton Towers opened as a Resort in 1980 therefore the map indicates no real alteration.

3.4 **Description**

3.4.1 The site of Alton Towers, the main country house, valley garden and eclectic mix of garden buildings associated generally originate from the early nineteenth century (C19). This is Grade I Listed by Historic England making it within the top 2% of England's heritage.

3.4.2 From a distance the principal buildings with the biggest impact on the wider landscape are the Towers which are Grade II* listed. The castellated gothic Ashlar Sandstone towers are prominent landmarks. In recent years the buildings have become derelict although restoration is ongoing to conserve their existence.

3.4.3 Greatest historic significance can likely be attributed to the two gardens within the house grounds. The two major garden designers were Thomas Allason and Robert Abrahams and it said to be the combination of money, architectural talent and an eye for beauty, which made the gardens the extravagant sight they are today.

3.4.4 The 'Star Garden'; which is a lawned area in present day, is named from the star-shaped feature fountain. To the east side is 'Her Ladyship's Garden'; with a raised walkway overlooking the lawn and fountain. This area is Grade II listed.

3.4.5 The Italian Garden, is the first area of the main valley garden, this is entered under the early C19 White Bridge. From this garden there are views east, down and along the valley garden which is densely planted with a very wide variety of specimen trees dating from the earlier C19. Down the centre of the valley is a series of four pools.

3.4.6 Historically the outer landscape of Alton Towers comprised two main elements, the former 'Deer Park' which extends 1km to the east of the house, and the wooded walks around the west and south sides of the rocky slopes below this. By present day the 'Deer Park' has become the large area of hardstanding which forms the car parks of the 'Resort'. The low, stone, Deer Park wall still survives, and this holds evidential and historic value.

4.0 Conservation Area Appraisal

4.1 A Conservation Area is defined by the Planning (Listed Buildings and Conservation Areas) Act 1990 as *'an area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance'*. Conservation Areas usually comprise groups of historic buildings and/or areas of attractive landscape closely associated with the built environment. They can be large enough to include historic cores of town centres such as Leek and Cheadle, or small in scale to contain attractive village scenery or special features such as a canal or historic parkland.

4.2 There are currently 14 Conservation Areas within the area covered by the Staffordshire Moorlands Local Planning Authority. Alton Towers Resort is located in 'Alton & Farley'.

4.3 The Alton and Farley Conservation Area is defined by the following boundary line:

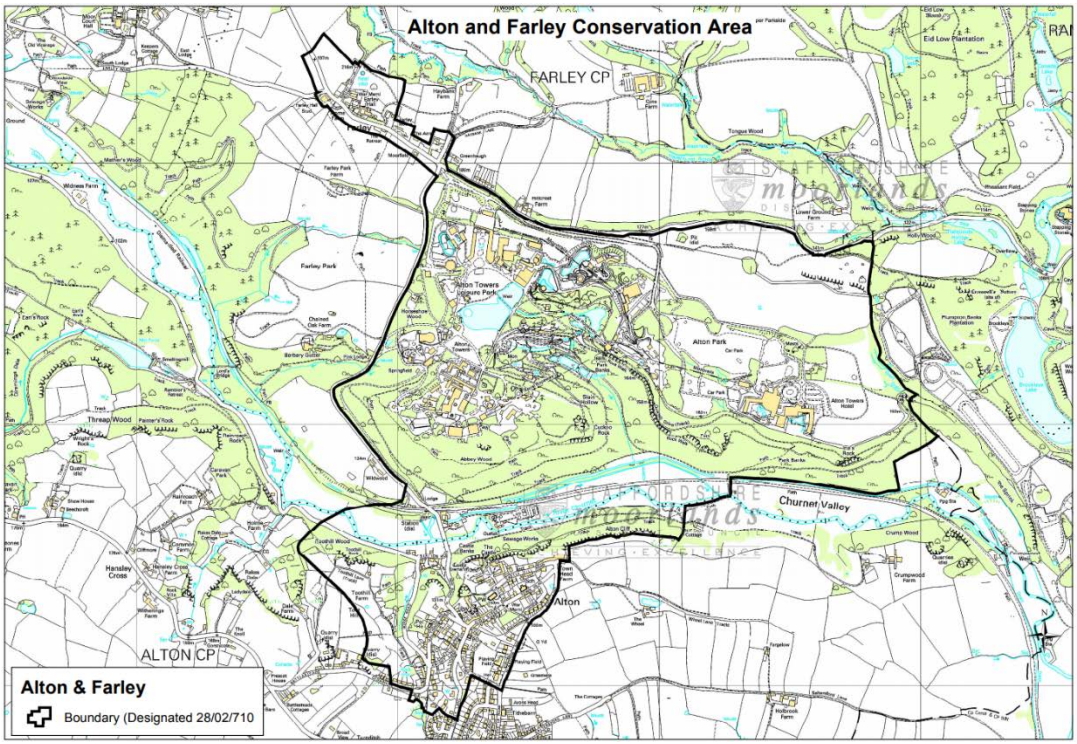


Figure 5: Conservation Area boundary by SMDC

4.4 The Alton and Farley Conservation Area boundary was designated or revised on 28th February 1971. SMDC have produced a Character Appraisal for the area and the following observations summarise the character of the area:

- *Alton village lies on irregular ground near Castle Rock, where C12 fortifications were constructed. The Castle, parish church, and Town Head occupy a substantial plateau above the village centre and are amongst the significant buildings.*

- *By 1500 Alton was in decline, it had lost its market as the castle, though garrisoned for Parliament in the Civil War, was of little importance in peacetime. The scarcity of early buildings in Alton suggests limited prosperity, more buildings survive from the mid C18, suggesting an upturn in the local economy climaxing in the C19 when more affluent classes began to build more substantial dwellings.*

- *Stone came into general use by around 1600 and remained the main building material for farms and farm buildings well into the C19. Given the quality of the local stone, ashlar was widely used for all types of buildings, with matching stone used for mullions, quoins, eaves and copings. Consequently, coursed rubble (roughly dressed stone) is relatively rare, as is the use of contrasting materials for walling and detailing. The Talbot Inn and Townhead farmhouse provide examples of ashlar used in a vernacular context but examples can be found throughout the Conservation Area. In most areas ashlar (smoothly dressed stone) was the preserve of the gentry.*

- *No medieval houses survive in the Conservation Area, but the remains of a C16 Cruck frame building is concealed behind the decorative C18 façade of 28-29 Horse Road*

- *Several houses date to the C17 or early C18 and are identifiable through the survival of one or more stone mullioned windows.*

- *The larger buildings date to the C18 or early C19, and are mainly of brick, although stone quarrying continued in Alton throughout the C19.*

- *C19 saw the expansion of the Potteries coupled to new the mechanisation of transport during the industrial revolution. With this came the mass production and distribution of clay roofing tiles, now regarded as the typical local roofing material. Before this slate was most prevalent and before this; thatch.*

5.0 Proposal Overview

5.1 The area of the Resort where alteration is proposed comprises the queue line 'wracks' for an existing themed attraction, the localised site also encompasses a buggy park and a small area of derelict land.



Figure 6: Extract from Smytheman Architectural Design & Access Statement showing modern material use across the site and low significance planting and shrubs.

5.2 The proposal is to install 2 No. Drop Tower rides aimed at a junior audience. Commercially this area of the Resort is currently experiencing low footfall and the new attraction will enhance Alton Towers popular 'CBeebies Land', the success of which provides the public with the ability to enjoy the evidential, historic and architectural value of Alton Towers which in turn results in 'communal' heritage value.

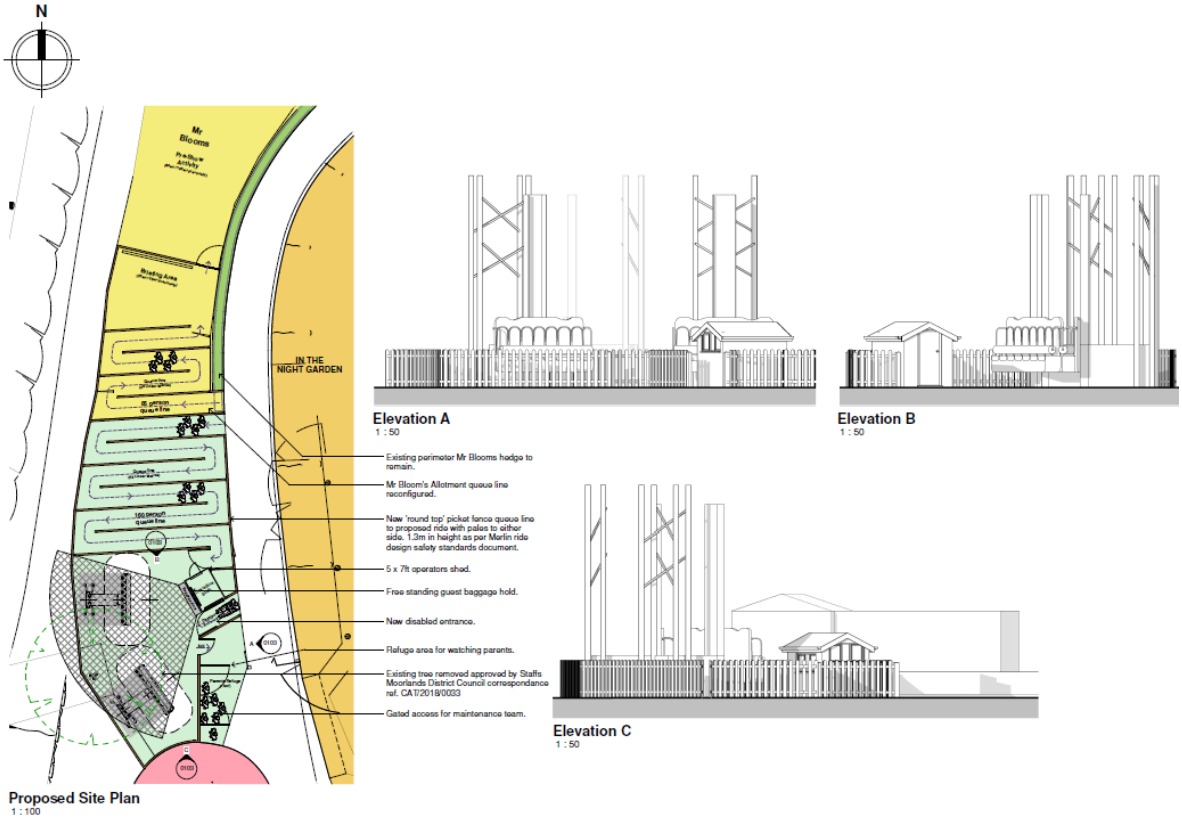
In essence this ability for society to explore and enjoy a historic garden by virtue of it having a modern day viable use is the entire ethos of conservation. Furthermore, the profitability of Alton Towers Resort ensures that sensitive restoration can be carried out to the many heritage assets within the gardens. This is before accounting for any other tourism or employment benefits that the Resort offers.

5.3 The new attraction features a thirty minute queue line accommodating 160 people. The park capacity is in excess of 20,000 making the proposal modest. As result the effect on the Alton & Farley conservation area is imperceptible as traffic generation will be minimal.

5.4 In terms of operational noise as a junior sized ride of modest proportion, the new attraction will not have a negative effect on the Alton & Farley conservation area through noise. The height of the attraction stands at circa 6.2m. Fortunately, the site is closely shielded by dense trees and vegetation. This will mitigate much of the noise generated and protect views from outside the site. As result any effect on the Alton & Farley conservation area is benign.

5.5 Proposed Plan from Smytheman Architectural:

Figure 7: Proposed Block Plan & Contextual Elevations A, B & C demonstrating site structures and queue line layouts. By Smytheman Architectural.



5.6 In terms of the influence of the proposals on heritage assets the new attraction is sensitively located away from the more significant garden areas and buildings. The closest heritage assets are the listed gate piers on the entrance to the park. The below extract from Historic England shows all features with statutory protection by a Blue triangle.

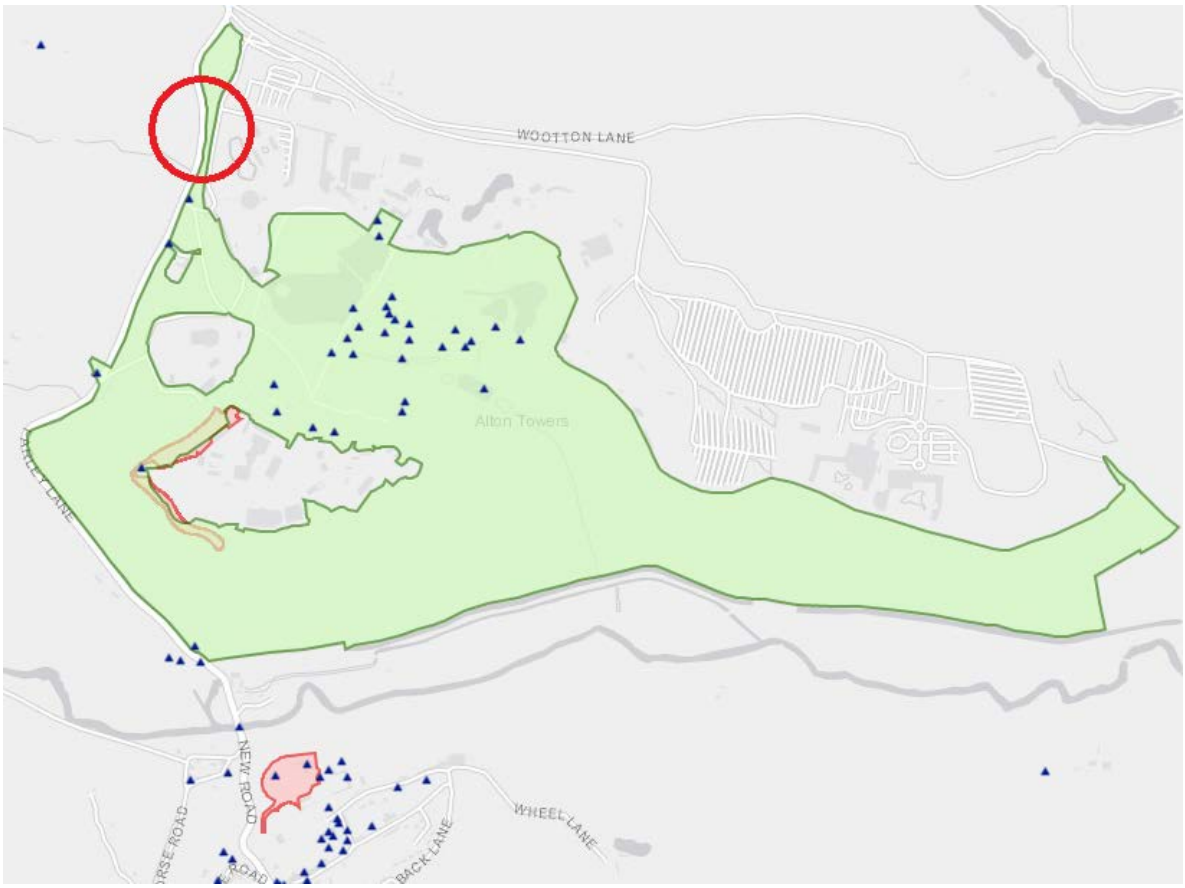


Figure 8: Listed buildings across Alton Towers Resort site and the wider local area of Alton. By Historic England.

Statutory Address: GATE PIERS, GATES AND RAILINGS FORMING PRINCIPAL ENTRANCE TO ALTON PARK, FARLEY LANE

District: Staffordshire Moorlands (District Authority)

Details: FARLEY C.P. FARLEY LANE (East side) SK 0643-0743 12/134 Gate piers, gates and - railings forming principal entrance to Alton Park - II

Gate piers, gates and railings. Early C19. Rusticated ashlar gate piers and wrought iron gates and railings. 4 gate piers of square section with pyramidal caps, 2 large ones flanking the central gates linked to 2 smaller end piers by short lengths of railings with spear heads.

6.0 Relevant planning policies

6.1 The Planning and Compulsory Purchase Act 2004 (the 2004 Act) requires that planning applications to be determined in accordance with the development plan unless material circumstances indicate otherwise.

6.2 Staffordshire Moorlands District Council are currently working on 'The Local Plan 2016-2031', the Council intends to publish the Preferred Options Local Plan for public consultation during the Summer 2017. Currently the Core Strategy 'Key Documents' set out the Council's town planning policies for guiding development and protecting the environment in Staffordshire Moorlands for the purposes of the 2004 Act. Additionally, Supplementary Planning Guidance (SPG) notes have been used during the design development stages of the proposals.

6.3 National planning policy guidance in the form of the National Planning Policy Framework (NPPF) underpin the general strategy for new development with which all development plans must be in broad conformity.

6.4 Finally, as the application building is listed, conservation policy should be used to assess the proposals. The document: 'Conservation Principles, Policies and Guidance' will be referenced as this provides up-to-date guidance on development within the historic environment.

6.5 The proposals have been assessed against these policies in the following sections:

6.6 Local Plan

6.6.1 The Staffordshire Moorlands Core Strategy defines the strategy at the heart of the new plan making. This strategy sets out the overarching spatial planning framework for the long term regeneration. Relevant policies include:

6.6.2 Policy SO9, this requires positive development to conserve and improve the character and distinctiveness of the countryside and its landscape, heritage, biodiversity and geological resources.

Assessment: The proposals have no effect on the Alton & Farley Conservation area by virtue of the modest scale. The location within Alton Towers Resort is sympathetic to the heritage assets across the site. There is no effect on the 'setting' of any listed structure or any significant part of the gardens.

6.6.3 Policy E3, this relates to Tourism and Cultural Development. Policy states development will be assessed according to the extent to which it supports the local economy. Additionally, Policy SA3, this policy looks to encourage a strong, diverse economy within Staffordshire Moorlands.

Assessment: Spatial Aim 3, is of particular relevance to Alton Towers Resort. SA3 provides support for the growth of existing businesses, including Alton Towers as a major employer. It states providing opportunities for expansion of businesses is central to the delivery of a thriving economy. This would fully accord with Policy E3.

6.7 Revised National Planning Policy Framework (2018)

6.7.1 The Revised National Planning Policy Framework (NPPF) key message is that the "presumption in favour of sustainable development" is considered to be "the golden thread running through both plan-making and decision making" which should be applied by local planning authorities when assessing and determining planning applications.

The relevant sections of the NPPF would be:

Section 16: Conserving and enhancing the historic environment.

6.8 Section 16

6.8.1 Policy 189 of the NPPF states: *"In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance".* This is the purpose of this document.

6.8.2 Policy 193 states "*When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation"*. This document has been demonstrated that new work involved within the proposal does not impact on the significance of a heritage asset.

6.8.3 Policy 201 states *"not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance"*, this is entirely true of the application in question which is within an area of the Resort where limited heritage value exists.

6.9 Historic England Guidance

6.9.1 Historic England have adopted the guidance document 'Conservation Principles policies and Guidance'. When dealing with historic places, guidance seeks to 'conserve' 'significance'. Significance relates to special interest and is likely to be the reason for protection if there is any. It should be noted that policy relates to 'conservation' and not 'preservation'.

6.9.2 Conservation is: *"The process of managing change to a significant place in its setting in ways that will best sustain its heritage values, while recognising opportunities to reveal or reinforce those values for present and future generations".* In other words, change is not something that should be avoided. The proposals add value to a Theme Park Resort without harm to any heritage assets. In fact, the continued success of the Resort has a positive effect on heritage assets as it 'enables future development', securing maintenance for the gardens and significant buildings and allowing the public to benefit from the 'communal value' of the historic gardens, this public benefit is the entire purpose behind the conservation of heritage.

7.0 Conclusion

7.1 To conclude, the proposal fully accords with planning policy, best practise design guidance and conservation philosophy.

7.2 For the reasons rehearsed above the effect of the proposals on the historic gardens of Alton Towers and the Alton & Farley conservation area setting is completely benign. For this reason, the author of this report has **NO OBJECTIONS** to the proposals.

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