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Staffordshire Moorlands District Council
Planning Policy Member
Moorlands House
Stockwell Street
Leek
ST13 6HQ

Date: 13 May 2021

Our ref: 03224/10/NT/VBM/19635099v6

Your ref: PP-09744940

Dear Ms Curley

Alton Towers Resort: Planning application for temporary stages

On behalf of our client, Alton Towers Resort, a company forming part of Merlin Attractions Operations Limited, Lichfields is pleased to submit an application for full planning permission for the installation of a seasonal temporary stage over a 5 year period at Alton Towers Resort (ATR). The stage is proposed to be installed in the Front Lawn for the summer season and relocated to the Fountain Square for the winter season. The description of development is:

“Installation of a seasonal temporary outdoor stage.”

The application comprises:

- 1 Completed and signed planning application form and certificates;
- 2 Planning Application Drawings, prepared by Nichols Brown Webber (see drawing schedule in Annex 1);
- 3 Heritage Assessment, prepared by Lichfields (see Annex 2); and
- 4 Sound Assessment, prepared by Cahill Design Consultants.

A payment of £234 has been made via the Planning Portal in respect of the Council's planning application fee. This has been determined on the basis of 'other operations' and a charge of £234 per 0.1 ha or part thereof and a site area of 677sqm.

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, including the Grade II* listed Alton Towers, 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.

Application site

The application site is 677sqm and comprises two areas where the stage will be installed at different times of the year:

- Summer season: The stage will be positioned on the gently sloping Front Lawn to the south of Towers Street and north of the lake. To the east and west are existing rides. The area is currently used as recreational space by visitors. The stage is proposed to be located to the north west side of the lawn behind an existing single storey building.
- Winter season: Fountain Square, located to the south east of the Hex ride entrance, will be the second location for the stage. It currently consists of a paved area of open space and is largely screened by existing trees to the north, east and south and the garden walls to the west.

Proposed development

ATR is seeking planning permission for the installation of a stage for outdoor entertainment events for a temporary period of 5 years. From March to the early November each season the stage will be located on the north west side of Front Lawn in its summer position (see drawing reference 373/103/SUM/2) and during November to February of each season it would be re-located to Fountain Square to support the Christmas and February half term winter offer (see drawing reference 373/103/CHR/2). In total, the stage will be used for no more than 262 days per year, although it is expected to be less. It is estimated that the stage will take 2-3 days to install in each location and around 1-2 days to remove. The final removal of the winter stage at the site will be at the end of November 2026.

The stage will comprise a freestanding scaffold structure measuring approximately 14m in length and 10m in depth with a total height of approximately 8.5m (see drawing reference 373/103/SUM/9 and 373/103/CHR/9). Accordingly no groundworks are required for the installation. It will be accessed by steps at the rear of the stage. In association with the stage demountable benches will be installed for the audience in front of the stage and moveable low level barriers will be installed in front of the stage measuring approximately 2.3m x 1.1m for crowd control.

The stage will be strictly managed by the ATR operations team in line with existing event management procedures. Events will only take place between 10am and 10pm. In addition to this, sound monitoring will be undertaken during sound checks before events commence to ensure that sound levels are in line with requirements with constant communication between the monitoring and sound engineers during this time. It

is expected that during weekends, holidays and event days the stage will lead to an additional 11 employees per day who are expected to be performers and 4 additional employees at other times.

The Covid-19 pandemic has meant that ATR, as with other leisure attractions, has had a very challenging year and its operations have been significantly impacted. There is a steep hill to climb to its road to recovery and Merlin Attractions (ATR's owner) is committed to continuing to invest in the site. This investment is critical to ATR's recovery, to ensure the Resort continues to attract visitors and that it can maintain its role as a major employer in the district.

The concept of providing an outdoor stage has been developed to respond to the current circumstances related to Covid-19 and the need for ATR to respond rapidly to the latest Government Guidance on opening the Resort with social distancing measures in place, with limited time in advance to plan. Accordingly, the stages were installed to be in place for the Resort opening on 12 April 2021. The applicant is keen to regularise this position and hence this application has now been submitted. The stages are expected to be a popular addition to the Resort's offer and therefore a temporary 5 year permission is sought.

It is noted that new temporary permitted development rights (under Schedule 2, Part 4, Class BB inserted by The Town and Country Planning (General Permitted Development) (England) (Amendment) (Coronavirus) Order 2021) have recently come into force which permit 'moveable structures' within the curtilage of listed buildings operated as historic visitor attractions until 1 January 2022. This underlines the importance the Government is placing on supporting attractions within historic environments recover from the pandemic and demonstrates the context within which the scheme has come forward. It is considered that the summer stage benefits from this permitted development right and that part of the period for the winter stage would also be applicable under the permitted development right, but for completeness and given the proposed five year period is sought under the application for the current period up to the end of November 2026.

Planning assessment

The Statutory Development Plan currently comprises the Staffordshire Moorlands Local Plan adopted in September 2020. The Churnet Valley Masterplan – Supplementary Planning Document (SPD) (March 2014) and National Planning Policy Framework (2019) are material considerations in the determination of planning applications at the site.

Principle of development

Alton Towers Resort is recognised in the Local Plan Spatial Vision for Staffordshire Moorlands as a significant tourist attraction within the local area and Policy SS11 'Churnet Valley Strategy' identifies the area for sustainable tourism and rural regeneration. In particular Policy SS11 supports the expansion of existing tourism attractions and facilities as does Policy E4 'Tourism and Cultural Development' and the Churnet Valley Masterplan.

The Churnet Valley Masterplan SPD identifies Alton Towers as an opportunity site based on the Long Term Plan that set out the Resort's plans over a 10 year period. This includes the aim to extend the appeal of the resort beyond the core 'theme park' as well as providing entertainment for different groups of people and age profiles. The SPD includes a Concept Plan for the Resort which identifies a number of zones within which certain measures are considered appropriate subject to further detail. The relevant zones to this application are:

- Zone 1: Towers Street area of redevelopment or retheming for leisure uses.
- Zone 2: Potential for redevelopment with leisure uses potentially suitable.
- Zone 9: Protection and enhancement of existing gardens and encouragement of better use by visitors.

The summer stage will be located within Zone 9 and immediately to the south of Zone 1 which encourages new leisure uses. The stage and associated seating in this location will also encourage visitors to spend longer periods in this part of the gardens. The winter stage will be located within Zone 2 and is also considered suitable for leisure uses.

Consistent with the site's overall use as a theme park, the proposal will support the successful operations of Alton Towers Resort and aligns with the aspirations of the development zones identified in the Churnet Valley Masterplan SPD. Accordingly, the principle of development is supported by policy.

Policy SS11 requires that development should be of a high standard of design and consider the landscape character in preparing development proposals to protect and conserve locally distinctive qualities and the sense of place. The Churnet Valley Masterplan also requires consideration of proposals on the site landscape. The Resort is well screened from views beyond the site boundary by vegetation and woodland and so the stage will not be visible from beyond the site boundaries. Within the Resort, in both locations, the stage will be seen within the context of the existing theme park buildings and attractions. Given its temporary nature it is considered that the stage in the proposed two locations would be acceptable in principle. Within each season when the stage is removed from the summer location the Resort maintenance team will ensure that the grass is maintained and reseeded as appropriate. The proposal is therefore consistent with the existing landscape character and acceptable in this regard.

The Government has issued a clear direction of the need to support businesses in the leisure, tourism and hospitality sectors in their recovery from the Covid 19 pandemic and the reopening of visitor attractions with various measures announced to assist prepare resorts for summer. The proposed development forms part of ATR's strategy to invest in and expand its outdoor events offer in response to the pandemic. As noted above the initial period of use of the stages would be covered by the recently introduced permitted development rights. The proposed stages will allow ATR to continue to contribute to the economic development and tourism aims for the area by acting as a national brand attracting visitors to the area as well as supporting local jobs. Local Plan Policy E4 positively supports the important role that tourism and culture plays in the economy of Staffordshire Moorlands and the proposed development will make a valuable contribution towards this.

Heritage assessment

In relation to the historic environment, Local Plan Policy DC2 states that the Council will conserve and where possible enhance heritage assets, including their setting in a manner appropriate to their significance. A heritage assessment of the proposal has been prepared by Lichfields and is provided at Annex 2. This concludes that the proposed stage is characteristic of the theme park activities within the Registered Park and Garden, Conservation Area and setting of the Grade II* Alton Towers. The proposal is not anticipated to lead to any harmful cumulative effects of long-term effects on the significance or setting of these heritage assets, noting in particular that the stages have been sensitively designed to be considerate of key views of the Towers and are temporary in nature. Accordingly, the proposed development complies with Local Plan Policy DC2.

Noise

Local Plan Policy DC1 'Design Considerations' requires that new development protects the amenity of the area including residential amenity of neighbours with respect to noise. ATR has carefully considered the design approach to seek to minimise impacts on its neighbours by using multiple low level localised and point source directional speakers to control the noise. The position and orientation of the stages have also been informed by the need to deliver effective noise control with both stages facing away from the closest

residential neighbours. ATR is also committed to undertaking tests prior to the season openings and monitoring throughout to ensure that the noise levels at the perimeter of the Resort are maintained.

A Noise Assessment has been prepared by Cahill Design Consultants which has assessed the proposed stage in the summer and winter locations, concluding that the proposed stage would be acceptable in noise terms. The assessment shows that the noise levels at the closest neighbouring residential properties would be in line with the noise requirements, noting that the levels of the Wootton Lane properties would be 1 decibel higher than standards but that this would be negligible. Notwithstanding, it is noted that the stage will play at a lower level volume the majority of the time and mitigation measures have been incorporated including:

- Highly directional speakers will be used facing away from the nearest residential properties;
- Absorbing materials are installed around the speakers to control noise levels at source; and
- Sound monitoring is now continuous with two monitors permanently in place.

As a result, the proposed development will protect the residential amenity of neighbouring residential properties in line with Local Plan Policy DC1.

Other environmental matters

With respect to ecology, the proposed stage locations are positioned within managed areas of the Resort which are not subject to ecology designations and do not have features of biodiversity value. Furthermore, additional lighting is not proposed. As such, the proposed development will comply with Local Plan Policy NE1 'Biodiversity and Geological Resources' which requires that development is acceptable in terms of biodiversity.

Local Plan Policy T1 encourages development to be located where the highways network can satisfactorily accommodate the traffic generated by the development. The proposed stage will complement the existing offer at the Resort and is not expected to lead to an increase in traffic. Indeed, the Resort is seeking to recover the visitor numbers which have reduced as a result of the pandemic. Accordingly, the proposed development is not considered to have an adverse impact on the local highway network and will be acceptable in transport terms in line with Policy T1.

Conclusion

In summary, a temporary freestanding stage is proposed to be installed at Alton Towers Resort for a five year period to hold outdoor events to complement the theme park offer. The stage will be located in the Front Lawn between March and early November for the summer season and repositioned in Fountain Square for the winter season between November and February. The stage will support the Resort's existing operations particularly in the short time whilst it seeks to respond to and recover from the Covid 19 pandemic. The principle of development is supported by planning policy and the proposal is considered to be acceptable from a heritage and amenity perspective.

We trust the information enclosed and described within this letter provides the Council with the relevant details it requires to validate and determine the application. In the meantime, please do not hesitate to contact me or my colleague Hannah Whitney.

Yours sincerely

Victoria Barrett-Mudhoo
Senior Planner

Annex 1: Application drawings

Drawing title	Reference	Scale
Planning Drawings		
Location Plan	373/103/1	1:2500 @A3
Block Plan Existing		
Summer Stage		
Block Plan Existing	373/103/SUM/1	1:500 @A3
Block Plan Proposed	373/103/SUM/2	1:500 @A3
Site Plan Existing	373/103/SUM/3	1:200 @A3
Site Plan Proposed	373/103/SUM/4	1:200 @A3
Site Sections Existing	373/103/SUM/5	1:200 @A3
Site Sections Proposed	373/103/SUM/6	1:200 @A3
Stage Plan Proposed	373/103/SUM/7	1:50 @A3
Stage Roof Plan Proposed	373/103/SUM/8	1:50 @A3
NE (Front) Elevation	373/103/SUM/9	1:50 @A3
SW (Back) Elevation	373/103/SUM/10	1:50 @A3
NW (Side) Elevation	373/103/SUM/11	1:50 @A3
SE (Side) Elevation	373/103/SUM/12	1:50 @A3
Christmas Stage		
Block Plan Existing	373/103/CHR/1	1:500 @A3
Block Plan Proposed	373/103/CHR/2	1:500 @A3
Site Plan Existing	373/103/CHR/3	1:200 @A3
Site Plan Proposed	373/103/CHR/4	1:200 @A3
Site Sections Existing	373/103/CHR/5	1:200 @A3
Site Sections Proposed	373/103/CHR/6	1:200 @A3
Stage Plan Proposed	373/103/CHR/7	1:50 @A3
Stage Roof Plan Proposed	373/103/CHR/8	1:50 @A3
NE (Front) Elevation	373/103/CHR/9	1:50 @A3
SW (Back) Elevation	373/103/CHR/10	1:50 @A3
NW (Side) Elevation	373/103/CHR/11	1:50 @A3
SE (Side) Elevation	373/103/CHR/12	1:50 @A3

Annex 2: Heritage assessment

Heritage policy and legislative context

The relevant legislative requirements are set out in Section 66(1) and Section 72(1) of the Planning (Listed Building and Conservation Area) Act 1990 (The Act). The local development plan comprises Staffordshire Moorlands' Local Plan 2014-2033 (SMLP, adopted Sept 2020).

Material considerations are the National Planning Policy Framework (NPPF, 2019), Churnet Valley Masterplan SPD (CVM, 2014) and Alton and Farley Conservation Area Appraisal (2008). Other relevant documents include the Alton Towers Conservation Management Plan (CMP, 2012) and Historic England's 'Temporary Structures in Historic Places' (2010).

The relevant legislative and policy considerations are:

- 1 Does the proposal conserve and, where appropriate, enhance the setting, significance and special architectural or historic interest of the affected heritage assets? (s.66(1) of The Act; NPPF Paras 192 and 193; SMLP Policy DC2; CVM Para.8.2 Heritage)
- 2 Does the proposal preserve or enhance the character and appearance of the conservation area? (s.72(1) of The Act; SMLP Policy DC2)

Historic England's 'Temporary Structures in Historic Places' (2010) provides guidance on the construction and use of temporary structures in historic environments. Relevant points are:

- 1 It is important to recognise the 'vital contribution' of events to the 'economic sustainability of our heritage' (p.1).
- 2 It is important to recognise the benefits that would arise from temporary structures, including: making a positive contribution to economic viability, increasing the capacity of historic sites temporarily and preclude the need for more permanent, and potentially harmful, forms of development (pp.7-9).
- 3 Key factors when considering temporary structures in historic environments are: location, physical impact, visual impact, setting, design, duration and season, public access and financial benefits (pp.14-17).
- 4 'There should not be a presumption against temporary structures simply because they are visible in the historic environment' (p.14).

Understanding of significance

As required by NPPF para.189, the significance of the heritage assets that may be affected by development is set out below. This is proportionate to the scale of the proposal; which is temporary and reversible in nature.

The summer proposal site (front lawn, Apr-Oct) is within the Alton Towers Registered Park and Garden (RP&G, Grade I), the Alton and Farley Conservation Area (CA) and the setting of Alton Towers (Grade II*) and the Stables (Grade II). Other heritage assets in the vicinity (which mainly comprise Grade II listed garden walling) have are not considered in detail in this assessment as any effects of the proposal would be minimal due to the nature of the proposal.

The winter proposal site (Fountain Square, Nov-Feb) is also within the Alton Towers Registered Park and Garden (RP&G, Grade I), the Alton and Farley Conservation Area (CA) and would be within the setting of Alton Towers (Grade II*). The nearby garden wall to the east of the towers (Grade II) has not been included as effects are considered to be minimal due to its existing setting and the nature of the proposal.

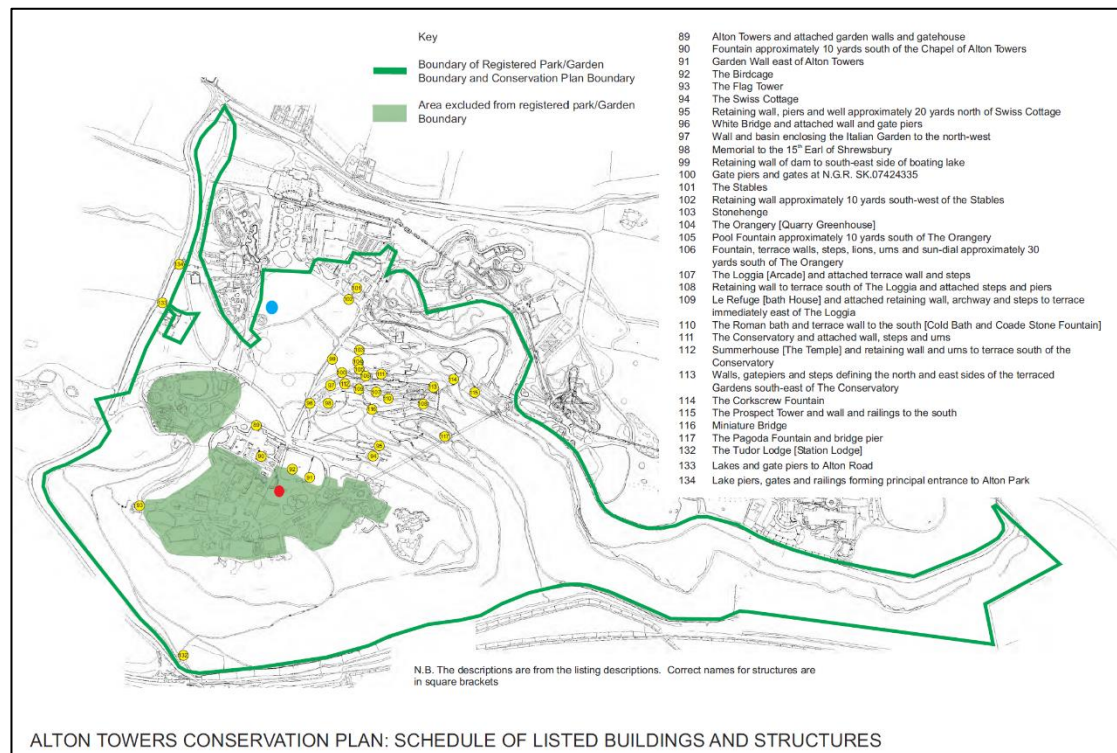


Figure 1 Alton Towers heritage assets with summer season site marked in blue and the winter season site marked in red. The whole Alton Towers site is within Alton and Farley CA (boundary not shown). Source: CMP, Lichfields, 2012

Therefore, the heritage assets relevant to this proposal are listed below and their significance (and contribution of their setting to significance where relevant) is summarised below:

- Alton Towers Registered Park and Garden (Grade I)** – The gardens are primarily of historic and artistic interest as an example of carefully-designed, 19th century, picturesque gardens which form the setting for Alton Towers. They became a “Pleasure Ground” from 1981 and were partly transformed into a theme park from the early 1980s when the first major rides were installed. The sloping front lawn, the lake and surrounding landscaping create picturesque views of the Towers.
- Alton and Farley Conservation Area** – The Conservation Area (CA) comprises Alton Towers and parts of the villages of Alton and Farley. The significance of the Area lies principally in the high concentration of heritage assets which demonstrate the historic development of the area and has high historic, architectural and archaeological interest. The development of the Alton Towers estate by the Earls of Shrewsbury is an important part of the historic development and significance of the area. The Area is on Historic England’s Heritage at Risk Register (CA Survey Uid: 453).
- Alton Towers (Grade II*)** – Predominantly of architectural and historic interest as a former grand, gothic revival country house largely constructed between 1811-1852 with a 17th century core. The development of the buildings by a series of prominent architects, in particular A. W. N. Pugin and E. W. Pugin, is a key element of its significance. The site was derelict at the time of listing and is included on the Heritage at Risk Register. The landscaped setting and key views from the north across the front lawn and lake to the main façade of the Towers contribute to its significance. While many of the rides and theme park structures are separated and screened from the Towers, its wider setting within the theme park is appreciable at Towers Street and Fountain Square.

- 4 Stables (Grade II) – Predominantly of architectural and historic interest as early 19th century stables which sit across the lake and front lawn from Alton Towers. Its significance is linked to its historic association to the Towers and use of a gothic revival architectural style. As such, the landscaped gardens and visual relationship to the Towers are key elements of its setting. Its wider setting within a theme park is appreciable from the activities nearby and incorporated within it, and its proximity to Tower Street.

Effects

The proposal would be a totally demountable stage structure (approximately 8.7m x 13.8m x 12.3m) with associated demountable benches for the audience. It would serve as a temporary location for events seasonally for 5 years and would assist in ATRs recovery due to the impacts of Covid-19 on its operations (the full rationale behind the proposal is detailed elsewhere in this cover letter). By virtue of its temporary and demountable nature, it would be a completely reversible alteration to the RP&G, CA and settings of identified listed buildings.

For the summer season (6.5 months), the stage would be on the north-west side of the front lawn, to the south of Towers Street and partially screened behind an existing modern building. It would be characteristic of the theme park activities in this location, concentrated at Towers Street and the south and west sides of the front lawn. While it would be visible in views from Towers Street to the Towers, it would not challenge the prominence of the Towers in the landscape: its height (roughly a 2 storey building) would not compete with the height/massing of the Towers, particularly as the topography of the site rises up towards the Towers; and the site would be partially screened from the Towers. Key views would still be appreciable from alongside the lake and from Towers Street over the seating area, and would not be affected for 5.5 months of the year. The effects on the RP&G and CA would temporary and seasonal. The proposal would be clearly temporary in design and appearance and characteristic of the wider theme park activities within and in the setting of identified heritage assets.

For the winter season (4 months), the stage would be in Fountain Square to the south east of the Towers and screened from the wider site by the tall garden walls and surrounding foliage (largely evergreen, some deciduous). It would be characteristic of the theme park structures already in this location, the use of the square for events, and its role as a key route through the site to theme park attractions to the south. It would not affect key views of the Towers, nor detract from its dominance in the landscape due to the comparative height and massing. As with the summer season, it would be clearly temporary in design and appearance and completely demountable and reversible.

As highlighted in the HE guidance on temporary structures, the benefits of temporary structures must be recognised which here include: the positive contribution to economic vitality of the Towers which would subsequently ensure the continuing conservation of heritage assets following a difficult year due to Covid-19; and temporarily increasing capacity without introducing permanent forms of development within or in the setting of heritage assets.

As such, the stage and seating would be a temporary seasonal addition which would be totally demountable and reversible. While it would be within the RP&G, CA and the setting of the Towers for both seasons, the effects of each season would be different and both are deemed to be acceptable, therefore the proposal is not anticipated to lead to any harmful cumulative effects or long-term effects on the significance or setting of affected heritage assets. It would be characteristic of the theme park activities within the RP&G, CA and setting of identified listed buildings, and has been sensitively sited to be considerate of key views of the Towers. Its temporary addition would allow for benefits such as increased event space and site capacity in a sensitive and reversible way.

In summary:

- 1 Does the proposal conserve and, where appropriate, enhance the setting, significance and special architectural or historic interest of the affected heritage assets?

Yes. The significance and setting of all identified heritage assets would be preserved due to the temporary, seasonal and reversible nature of the proposal.

- 2 Does the proposal preserve or enhance the character and appearance of the conservation area?

Yes. The proposal would be characteristic of existing theme park activities within the CA and the temporary and reversible nature would preserve the character and appearance of the CA.