



Ms Jo Gregory
Staffordshire Moorlands District Council
Moorlands House
Leek
ST13 6HQ

Direct Dial: 0121 625 6848

Our ref: P01552293

16 December 2022

Dear Ms Gregory

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**ALTON TOWERS, FARLEY LANE, FARLEY, STAFFORDSHIRE, ST10 4DB
Application No. SMD/2022/0556**

Thank you for your letter of 17 November 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

This is a highly sensitive site of overlapping heritage assets.

For many years the impact of the taller rides has been reduced by clustering them together where they would best be screened by surrounding tree cover. The application site is outside this zone, and it is clear that the proposed 20m high structure would be visible from the wider area. Historic England has concerns regarding the proposals on heritage grounds, and would urge the applicant to work with your officers to consider alternative, less prominent locations for such a tall structure.

Historic England Advice

Built between 1810 and 1840, (with later additions), for the 15th and 16th Earls of Shrewsbury the Grade II* listed Alton Towers was once a great country house set within lavish grounds. In fact, of such historic, architectural and aesthetic interest at the grounds that they are separately designated as a Grade I Historic Park and Garden - the highest grade of national listing.

Set within the Churnett Valley the park was laid out in the early 19th century to take advantage of its steep slopes, and dramatic views and vistas, creating an opulent pleasure ground for the delight and amusement of the Earl of Shrewsbury's family and guests. Taking inspiration from around the world no expense was spared, and the gardens boast numerous separately listed buildings and structures, such as the resplendent Chinese pagoda fountain which draws water from the lake and shoots it high into the air from its pointed tip, the elegant conservatory adorned with crowns and



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pineapple finials where the Earl grew exotic bananas, the charming Swiss Cottage, fanciful 'Roman' baths and even a miniature Stonehenge.

In the late 20th century the grounds and Hall became a theme park and has continued to expand, attracting millions of visitors from across the world to this exciting and whimsical site.

Located to the north of Alton Village, and surrounded by extensive woodland, the whole site is within the picturesque Alton and Farley Conservation Area. As such this is a complex site of overlapping and interlinked highly graded heritage assets and their settings. Any new development therefore must be very carefully considered.

In view of this sensitive location we would draw your attention to the requirements of the Planning (Listed Buildings and Conservation Areas) Act 1990, and the Ancient Monuments and Archaeological Areas Act 1979. We would particularly highlight the need to pay special attention to the preservation of listed buildings and their settings, and the desirability of preserving or enhancing the character or appearance of the conservation area.

As you will be aware, section 16 of the National Planning Policy Framework also emphasises the need to conserve and enhance the historic environment. When considering proposals local authorities should assess their impact on a heritage asset, to avoid or minimize any conflict between the heritage asset's conservation and any aspect of the proposals. Furthermore, any harm to the significance of a designated heritage asset, including through development in its setting, should require clear and convincing justification. Where harm is identified, regardless of the level, this should be weighed against public benefits.

Section 12 further states that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. Planning decisions should therefore ensure that development adds to the overall quality of an area; is visually attractive as a result of good architecture, layout and appropriate and effective landscaping; is sympathetic to local character and history, and establishes or maintains a strong sense of place. Furthermore, permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.

We would also highlight our good practice advice *The Setting of Heritage Assets*.

The application site is located to the south west of the Hall, close to the early 19th century Grade II listed castellated Gothic flag tower and the remains of Bunbury Iron Age Hillfort, part of which is scheduled as an Ancient Monument. Currently used for storage, we understand that an attraction once occupied the site. However, we also understand that this was a relatively modest structure.



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Whilst we would have no objection in principle to the redevelopment of the application site, we do have concerns regarding the size of the proposed structure.

It has been our understanding that for many years taller rides have been deliberately clustered to the area to the north west of the Hall in order to benefit from the topography of the site and surrounding tree cover, to reduce their wider visual impact. In our view this has seemed a reasonable compromise to support the existing business, whilst also having due regard to the rural, wooded character of the surrounding landscape.

Clearly your local authority will determine whether further views and assessment are required. However, from the images within the application it is clear that the almost 20m high structure will be visible from the surrounding area.

It is unclear from the application why the proposed attraction needs to be located on this site, and what alternative, less conspicuous locations have been considered.

In addition, whilst obviously each application should be considered on its own merits, we are concerned that this could set an unfortunate precedent across the site. In our guidance document on setting we highlight the potential harmful cumulative impact of incremental incursions into a historic landscape.

Having considered the proposals, we would urge the applicant to work with you to consider the topography of the site and seek alternative locations where a structure of this size could be better accommodated. With regard to the future, the applicant may want to consider commissioning a heritage assessment and management plan, informed by your Authority's conservation adviser. Such a detailed document would consider the site holistically both to highlight areas of greater sensitivity, whilst also identifying sites of potential future opportunity.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Julie Taylor

Inspector of Historic Buildings and Areas

