

Heritage Statement

Alton Towers, Alton: Replacement Attraction to Forbidden Valley Area.

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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 PLC. 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 a 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 A site survey and visual inspection were carried out in October 2023. 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 practice guides and the local authority's appraisal of the conservation area.

2.0 Site Location & Site Information

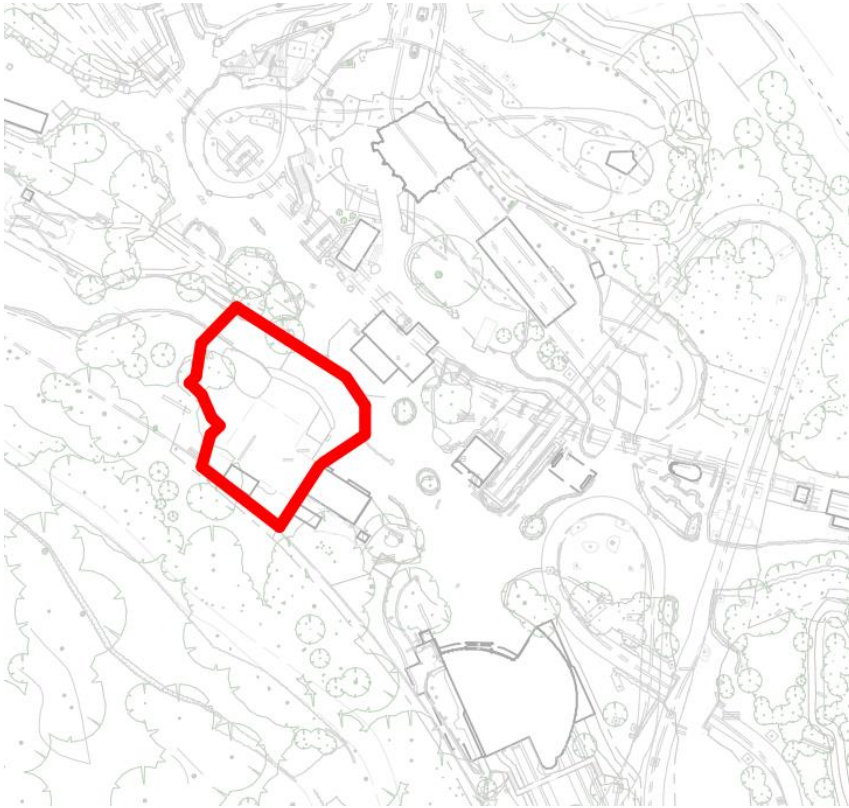


Figure 1: Extract from Ordnance Survey by Smytheman Architectural, see drawing Ref. ATPO-SA-FV-XX-DR-A 0101. The site edged.

- 2.1 Alton Towers Resort is located at National Grid Reference - SK 07150 43716.
- 2.2 The proposed site (see Figure 1) comprises a small area within the themed area known as Forbidden Valley in the Alton Towers Resort site. The site is situated centrally and currently houses the Funk 'N' Fly attraction. To the West is the attraction Blade and further afield is the Forbidden Valley Sky ride station. To the Southeast is the Rollercoaster restaurant and Galactica station building, and to the North is Nemesis which is currently under refurbishment. The proposed site has a footprint of approximately 933m².
- 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.

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 are several scheduled ancient monuments and listed buildings of varying significance.
- 3.2 The Resort also falls within the Alton and Farley conservation area boundary.
- 3.3 As a modern-day theme park attraction, these historic structures and monuments must sit alongside new attractions, service roads, operational buildings and the 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”*.
- 3.4 Figures 2, 3, 4 and 5 below are early maps and aerial photographs depicting the transformation of the Alton Towers Estate indicating the Listed buildings and assets within the Estate along with a brief description of these assets.

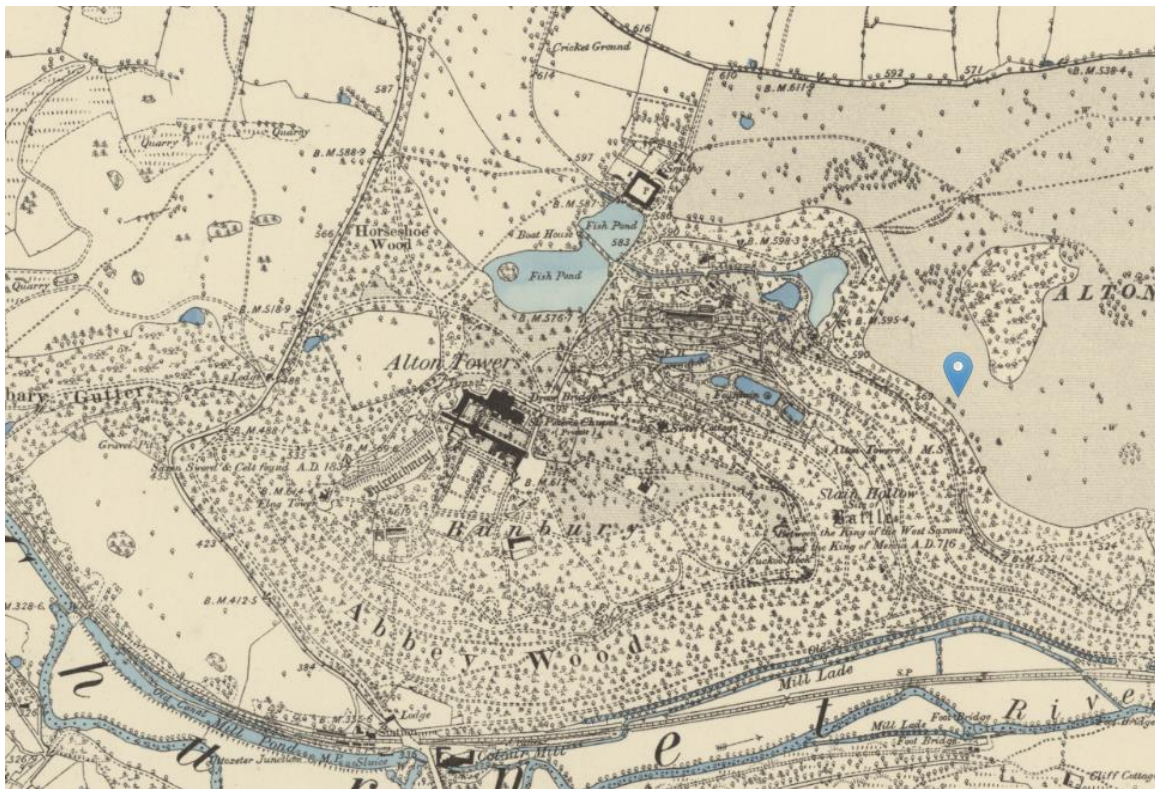


Figure 2: Historic Ordnance Map from the 1840s - 1880 (above) indicates the transformation of Alveton Lodge into the Alton Towers between 1810 to 1880. The main Gardens and lakes can be seen with the stables at the North of the site and the flag tower to the West of the site. The Proposed site for alteration is indicated by the Blue marker to the East.



Figure 3: Historic Ordnance Map from 1949-1972 (above). Alton Towers opened as a Resort in 1980 indicating no real alteration from the previous figure 3. The site for this application is shown with the blue arrow.

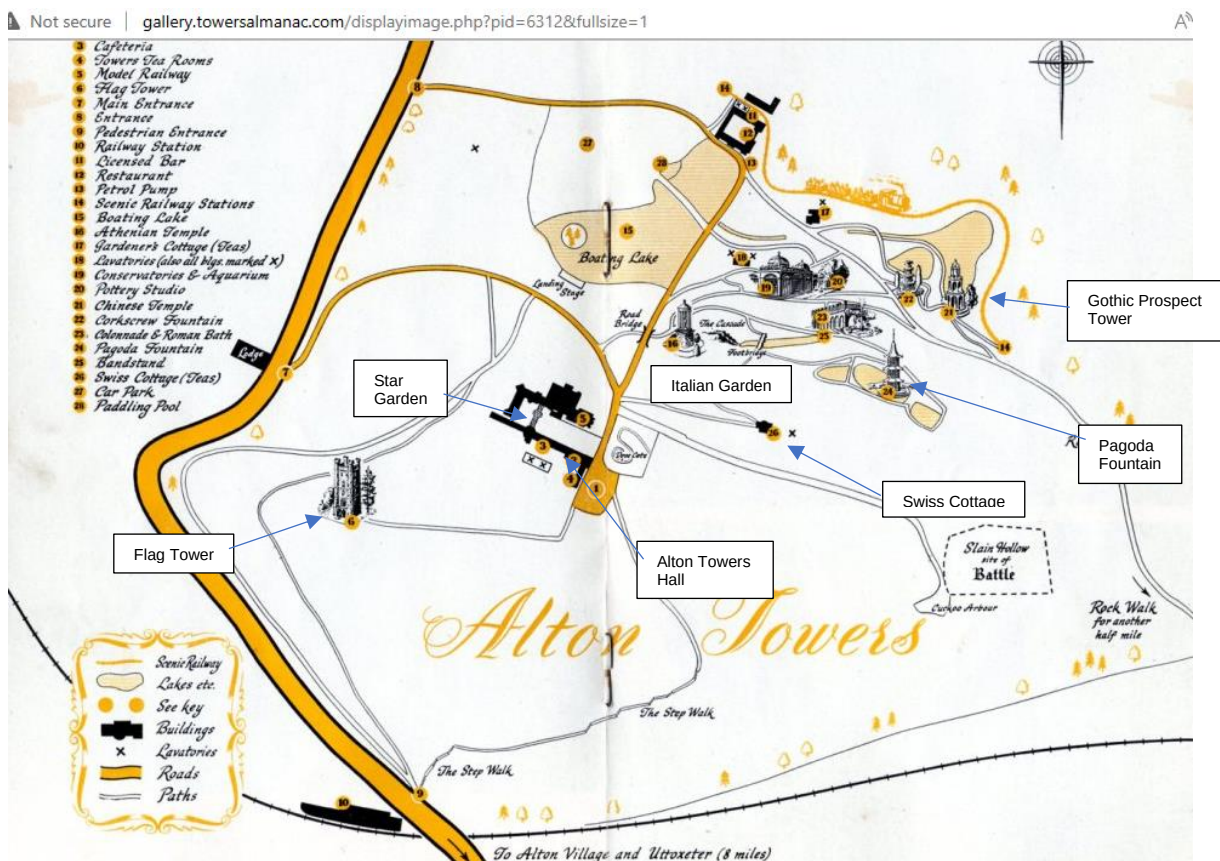


Figure 4: A 1957 map of the Alton Towers Estate upon being open to the public after the Second World War indicating the prominent features at the time including the locations of the Star Garden within the Grade II Alton Towers, The Italian Garden, The Flag Tower, Swiss Cottage, Pagoda Fountain, Gothic Prospect Tower and the remains of the Deer Park Wall which bounds the Forbidden Valley land.

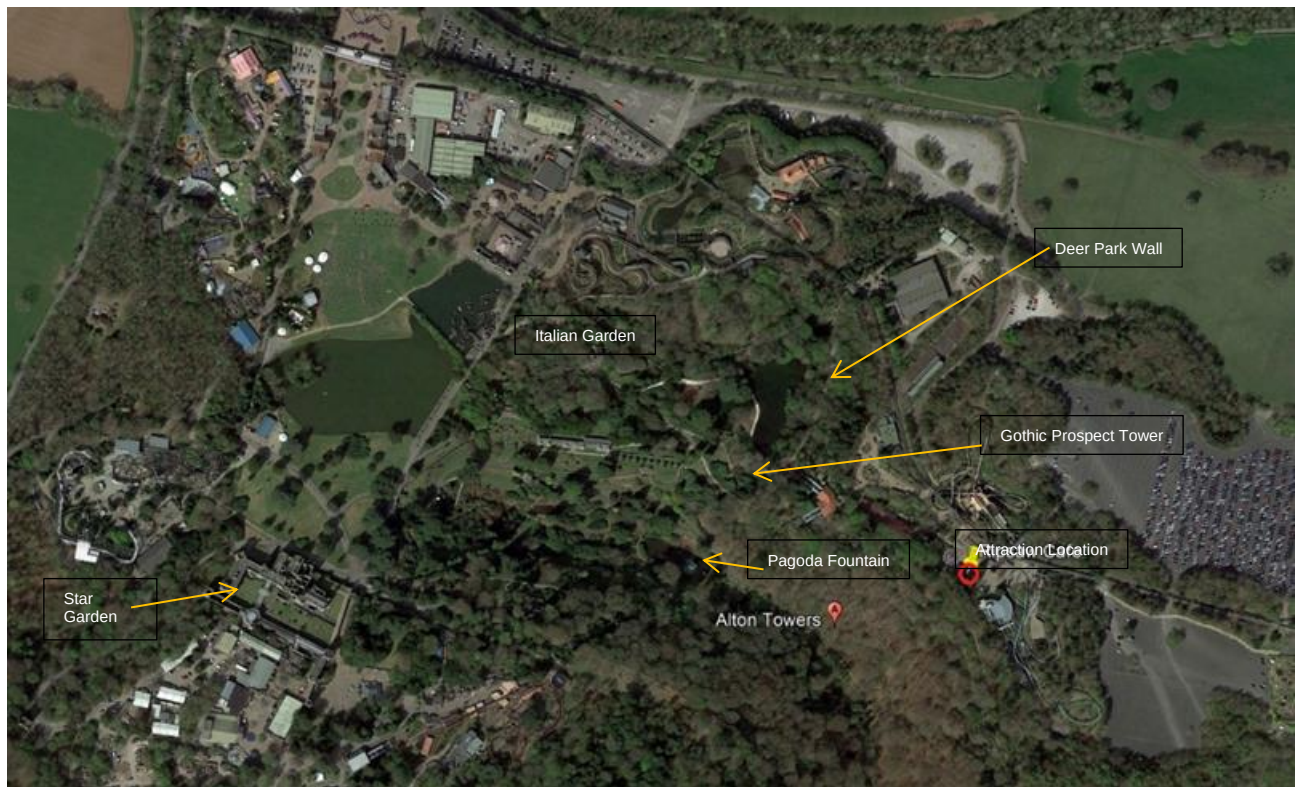


Figure 5: A modern-day aerial view of Alton Towers (Google.2023) the site is indicated by a red-edged circle, with the main prominent Listed features indicated as depicted in the early maps from figures 2,3 and 4.

3.5 Description of the Listed Buildings and Assets

- 3.5.1 The site of Alton Towers, the main country house, valley garden and eclectic mix of associated garden buildings 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.
- 3.5.2 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.
- 3.5.3 The greatest historical significance is likely to be attributed to the two gardens within the house grounds. The two major garden designers were Thomas Allason and Robert Abrahams and it is said to be the combination of money, architectural talent, and an eye for beauty, which made the gardens the extravagant sight they are today.
- 3.5.4 The 'Star Garden' which is a lawned area in the present day, is named after 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.
- 3.5.5 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.
- 3.5.6 The outer landscape of Alton Towers comprised two main elements: the deer park extending c 1km to the east of the house, and the wooded walks around the west and south sides of the rocky slopes below this. The deer park has now (late 1990s) been almost

wholly subsumed under the buildings and car parks of the leisure park. The low, stone, deer park wall and its inner ditch, however, which border the park to the south, survive.

3.5.7 The Prospect Tower, Wall and Railings (Grade: II*) (approx. 80m away)

The Prospect Tower was designed by Robert Abraham in 1824. It is built of ashlar made to look like cast iron as well as actual cast iron elements. The observation tower is octagonal in plan and its three tiers resemble a Chinese pagoda but in fact, its detailing is Gothic, with flattened “Tudor” arches of stone with slender composite columns on the first two levels; cusped and docketed ogee arches at the top and an encrusted ogee cap. The tower is considered to be one of the most important and significant of the garden buildings and is an important piece in the layout of Alton Towers Park.

3.5.8 Deer Park Wall (non-designated heritage asset)

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 the present day the 'Deer Park' has become a 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. The wall that demarcates the boundary of the former deer park (in which the Alton Towers Resort is constructed) is considered an undesignated heritage asset for its historic importance as an element of the Alton Towers estate.

3.5.9 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 asset is the non-designated heritage asset deer wall that sits approximately 1m away from the rear of the proposed building. The existing building sits approximately 0.5m away so it is thought the impact of the new building will be reduced, allowing it to regain some of its significance as a feature of separation between the Garden and the Park.



Figure 6: Listed buildings across the Alton Towers Resort site and the wider local area of Alton. By Historic England the two closest are shown circled and listed below.

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 shown below in Figure 7:

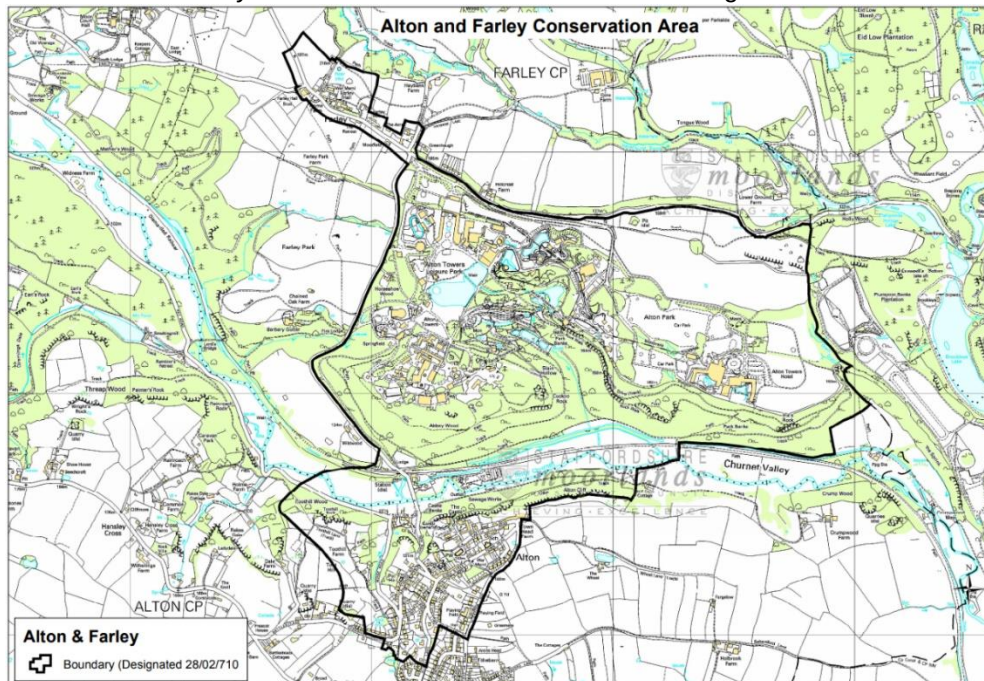


Figure 7. The Alton and Farley Conservation Area boundary was designated or revised on 28th February 1971.

- 4.4 SMDC has 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 among 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 survived 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 are 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 the proposal is situated comprises of a hard landscaped area consisting of block paving and concrete foundations at the location of the previous attraction. Located atop is the Funk'n'Fly which is a spinning flat ride measuring approximately 18m in height when in operation. It is proposed to remove Funk n Fly and install a new attraction that sits atop a purpose-made building across the breadth of the existing pathway. By doing this, it is thought that all construction works are away from the Deer Wall heritage asset, mitigating any potential issues.



Figure 8: Extract from Smytheman Architectural Design & Access Statement showing Existing arrangement on site.

- 5.2 The existing hardstanding belonging to Funk n Fly will be repurposed and form the entrance and queue line for the attraction. Pockets of soft landscaping will be created to break up the hard landscaping and to aid the softening of the proposed building mass.
- 5.3 As explained in the sound assessment report, the noise levels of the attraction will comply with the requirements. Any proposed speakers will be carefully controlled and face away from noise-sensitive receivers as requested. As a result, any effect on the Alton & Farley conservation area is benign.

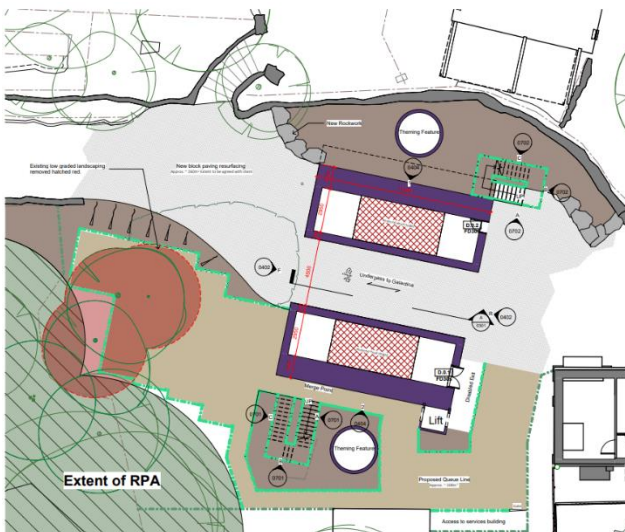
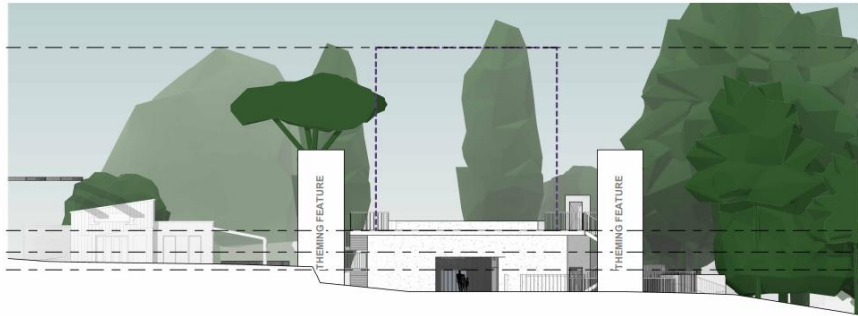


Figure 9: Proposed Plan extracted from Smytheman Architectural drawing

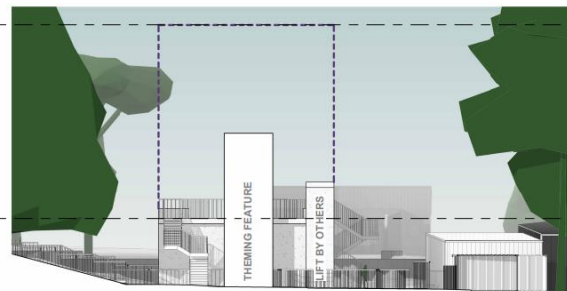
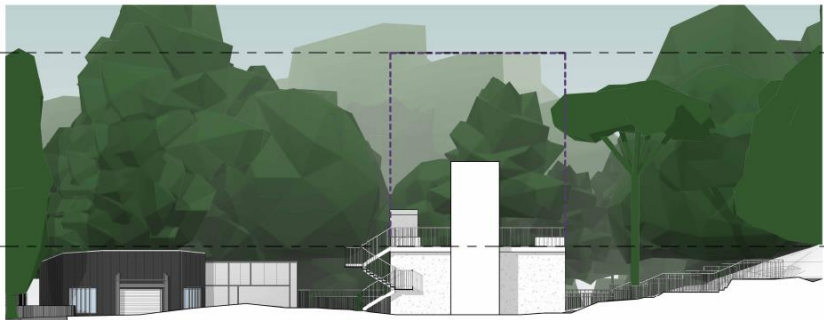
- 5.4 The external elevations consist of cast in situ concrete formations with steel access staircases and an external grade platform lift. Two themed elements will sit on either side of the attraction and alongside the elevations, will receive themed finishes, the details of which are to be determined at a later date.



F Front Elevation
1:100



1 Side Elevation
1:100



2 Side Elevation
1:100

Figure 10: Proposed Elevations extracted from Smytheman Architectural drawing

- 6.1 The Planning and Compulsory Purchase Act 2004 (the 2004 Act) requires that planning applications be determined in accordance with the development plan unless material circumstances indicate otherwise.
- 6.2 National planning policy guidance in the form of the National Planning Policy Framework (NPPF) underpins the general strategy for new development with which all development plans must be in broad conformity.
- 6.3 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.
- 6.4 The proposals have been assessed against these policies in the following sections:

6.5 Local Plan

- 6.5.1 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 long-term regeneration. Relevant policies include:
- 6.5.2 Policy SO9, 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 do not affect the Alton & Farley Conservation area on a 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.

- 6.5.3 Policy E3, this relates to Tourism and Cultural Development. The 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.

6.6 Revised National Planning Policy Framework (2018)

- 6.6.1 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.

6.7 Section 16

- 6.7.1 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.
- 6.7.2 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 demonstrated that new work involved within the proposal does not impact the significance of a heritage asset.
- 6.7.3 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.

6.8 Historic England Guidance

- 6.8.1 Historic England has adopted the guidance document 'Conservation Principles Policies and Guidance'. When dealing with historic places, the 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'.
- 6.8.2 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. 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 practice 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.

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