



SMYTHEMAN
ARCHITECTURAL



Heritage Statement

The proposal is for the removal of an existing attraction and to replace it with a new attraction and ancillary buildings (station and maintenance buildings) within the CBeebies Land area of Alton Towers.

ATPS-SA-CBL-XX-HS-A-0002

1.0 Introduction

2.0 Site Location & Site Information

3.0 Heritage Asset Description

4.0 Conservation Area Appraisal

5.0 Proposal Overview

6.0 Relevant planning policies

6.1 Assessment of Proposal Against Policies

6.2 Local Plan

6.3 Revised National Planning Policy Framework (2024)

6.4 Section 16

6.5 Historic England guidance

7.0 Conclusion

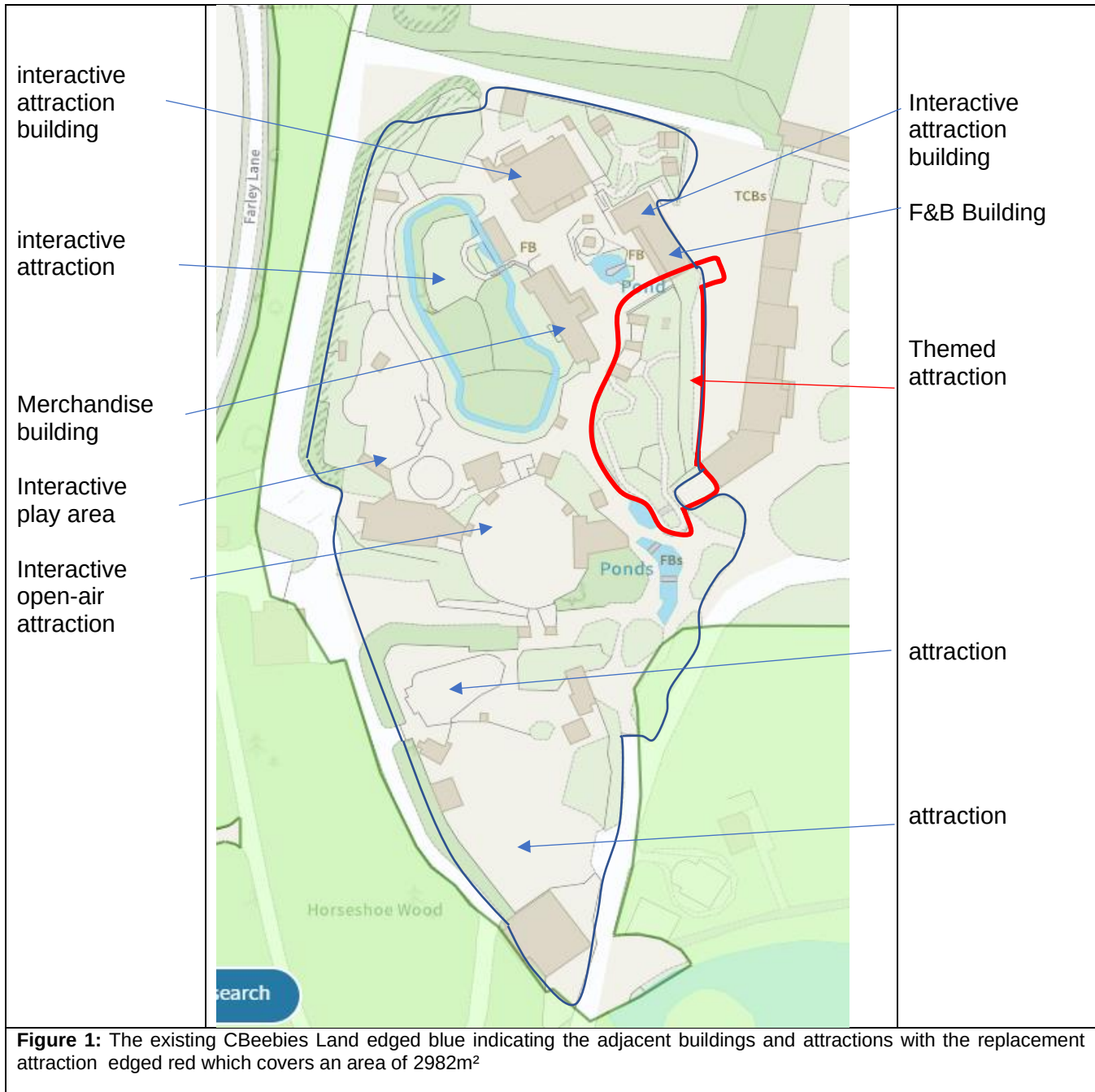
Bibliography

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 for the Alton Towers Resort.. This appraisal has been carried out to assess the impact of a proposal in a localised area of the Alton Towers 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 this 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 Moorlands 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 2024. 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.

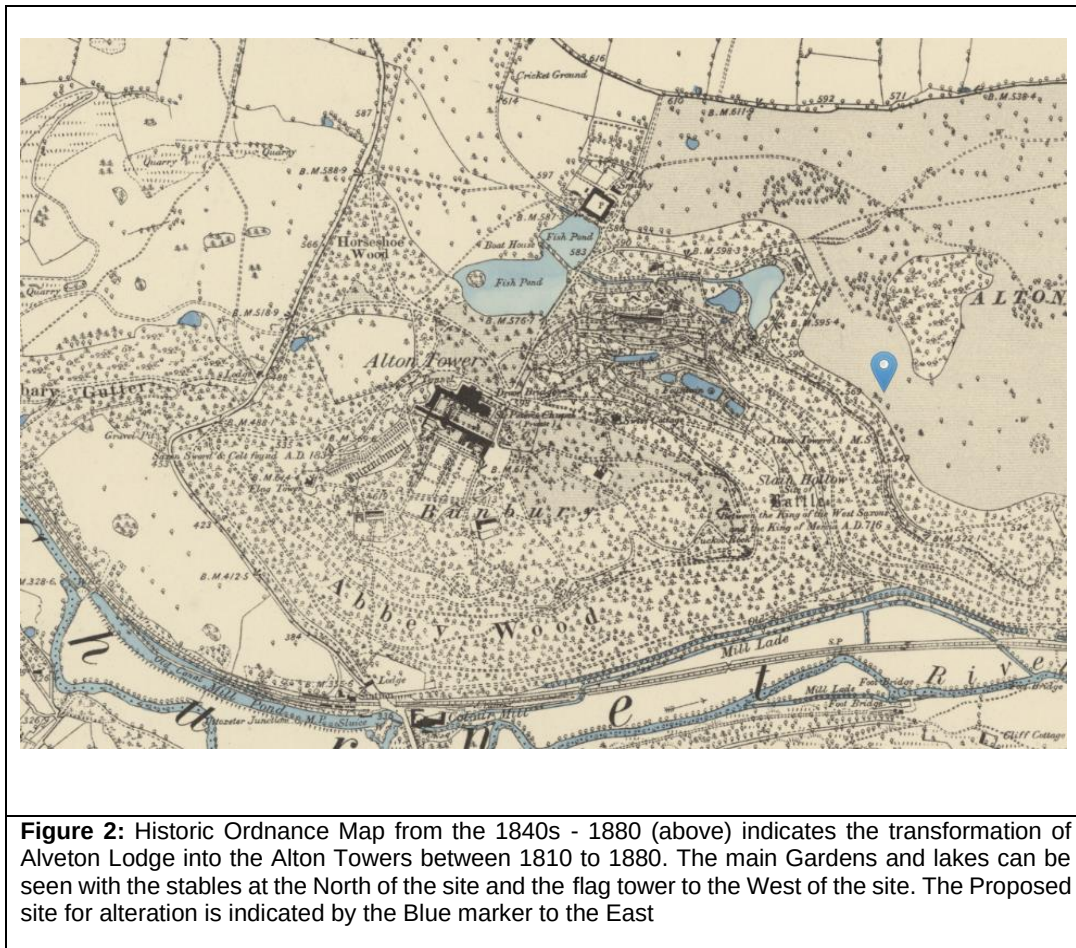
2.0 Site Location & Site Information

- 2.1 Alton Towers Resort is located at National Grid Reference - SK 07150 43716.
- 2.2 The existing site (see Figure 1) houses the current attraction (intended for replacement). This includes the station, 3 themed buildings and other smaller theming features throughout. Additionally, the proposed site boundary includes part of the outdoor seating area to the Corner Coffee building, Admin building car park and themed buildings within the themed CBeebies Land in the Alton Towers Resort



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 below are early maps 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 with Figure 5 showing a google image view of the Resort today



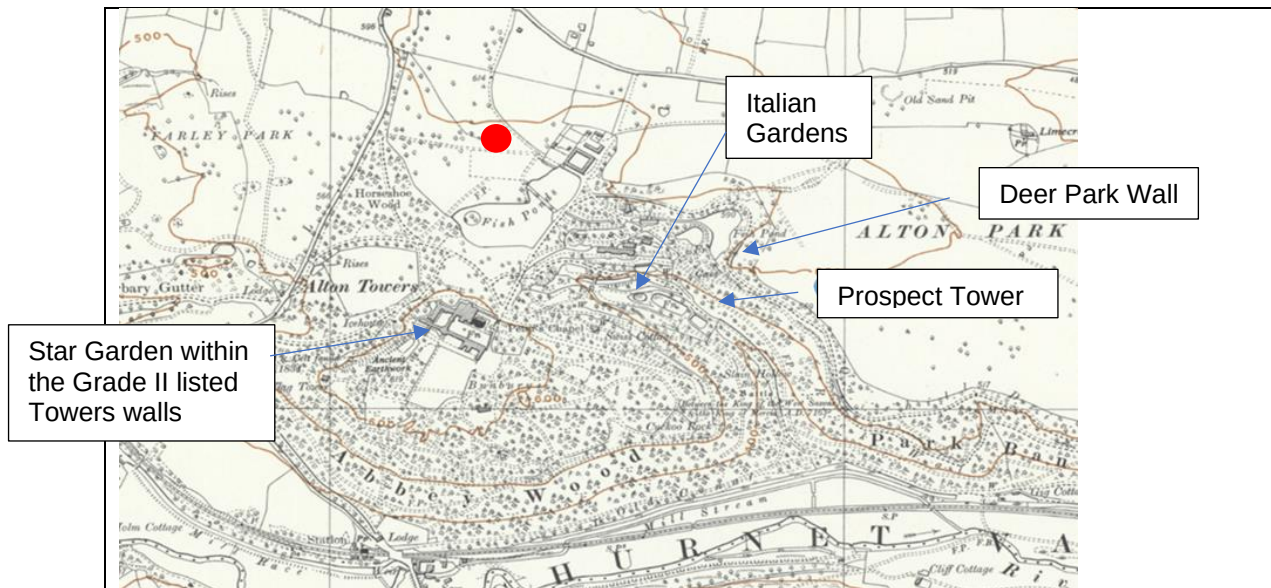


Figure 3: Historic Ordnance Map from 1949-1972 (above). Alton Towers opened as a Resort in 1980 indicating no real alteration from the previous Figure 3. The site for this application is shown with a red circle.

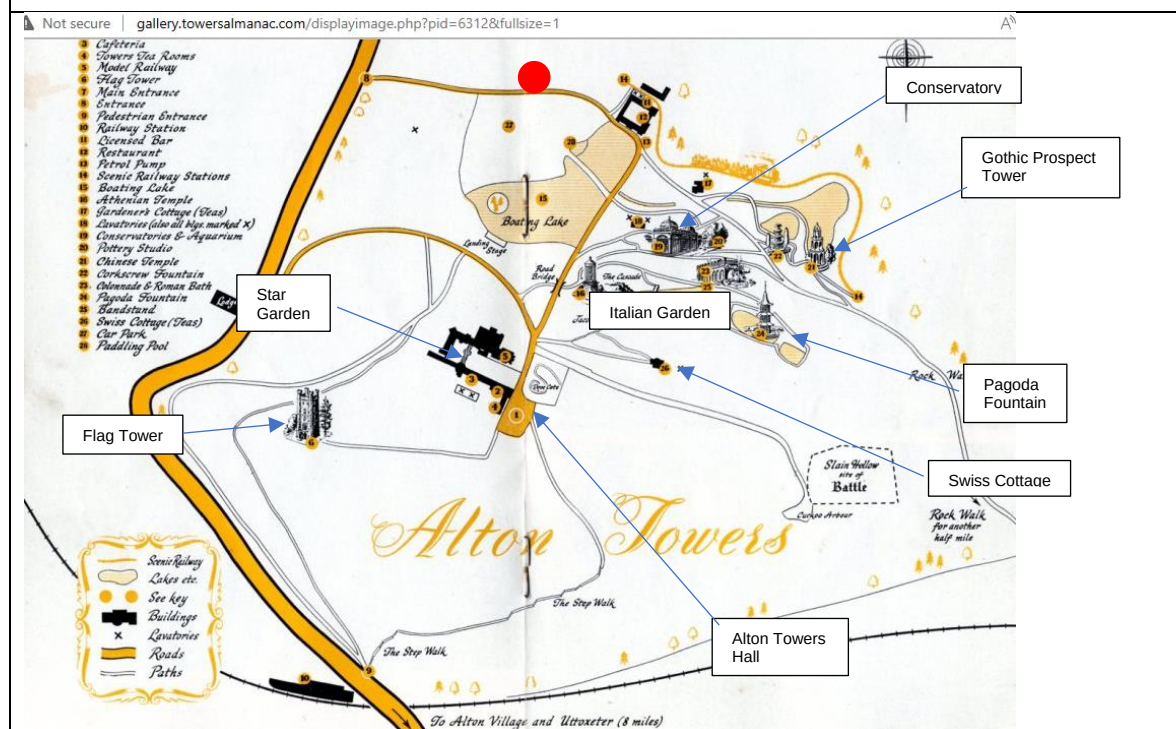
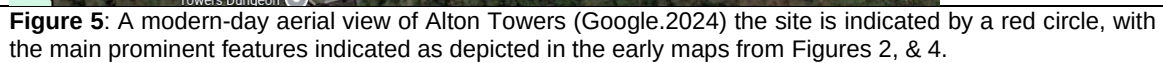


Figure 4: A 1957 map of the Alton Towers Estate upon being open to the public after the Second World War indicating the prominent features at the time including the locations of the Star Garden within the Grade II Alton Towers, The Italian Garden, The Flag Tower, Swiss Cottage, Pagoda Fountain, Gothic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



- 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). The gardens are 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 by the current owners to conserve their existence.
- 3.5.3 The greatest historical significance 1814-1827 is likely to be attributed to the two gardens within the house grounds, designed by Thomas Allason and Robert Abraham, 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*) 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 replacement attraction is on the site of an existing attraction, situated away from any of the more significant garden areas and buildings. The closest heritage asset is the Grade II listed gates and railings forming the principle entrance to Alton Towers Resort and sits approximately 500m away from the front of the site. The proposal will have no influence on this or any of the Heritage assets in the resort area. See Figure 8 below.

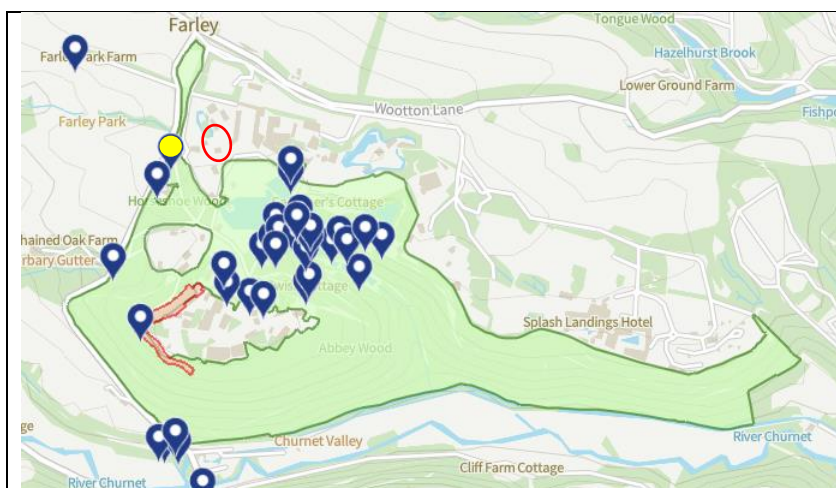
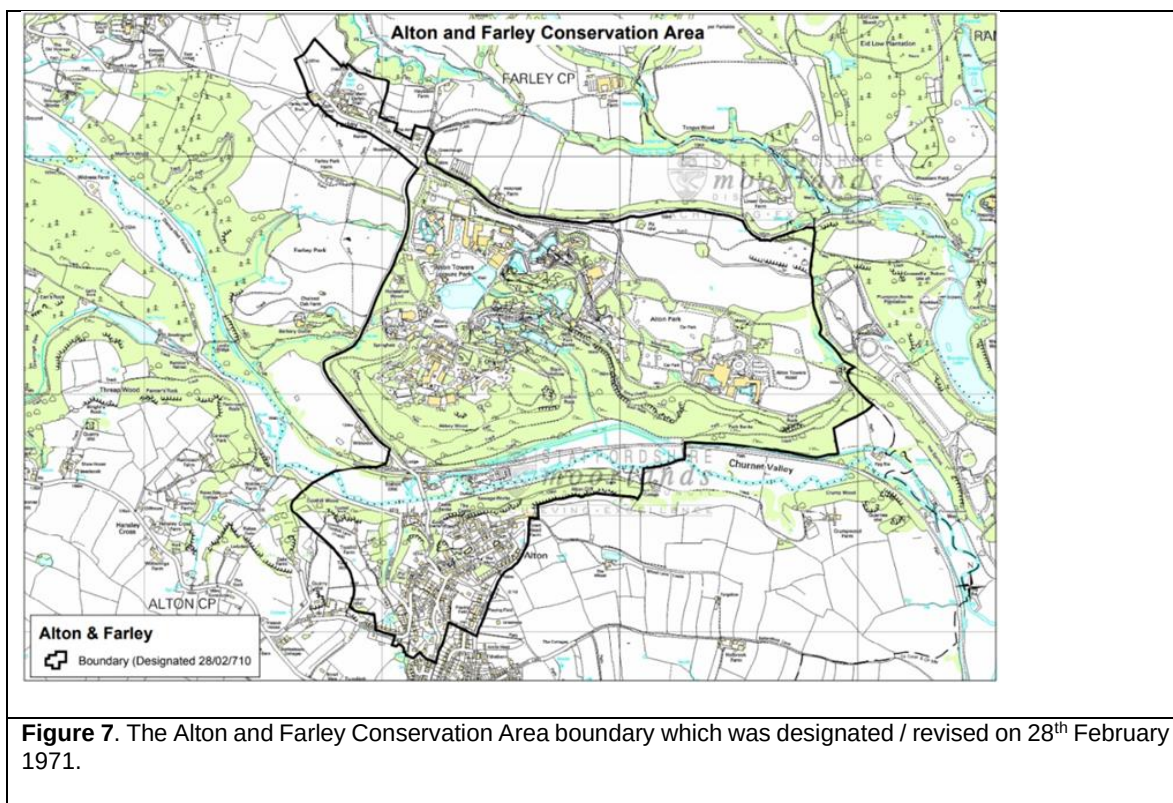


Figure 6: Listed buildings across the Alton Towers Resort and the wider local area of Alton, with the site circled red. The closest Asset is the Grade II listed gates circled yellow. Map taken from Historic England.

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. 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 Resort lies within the Alton and Farley boundary, which is shown in Figure 7 below.



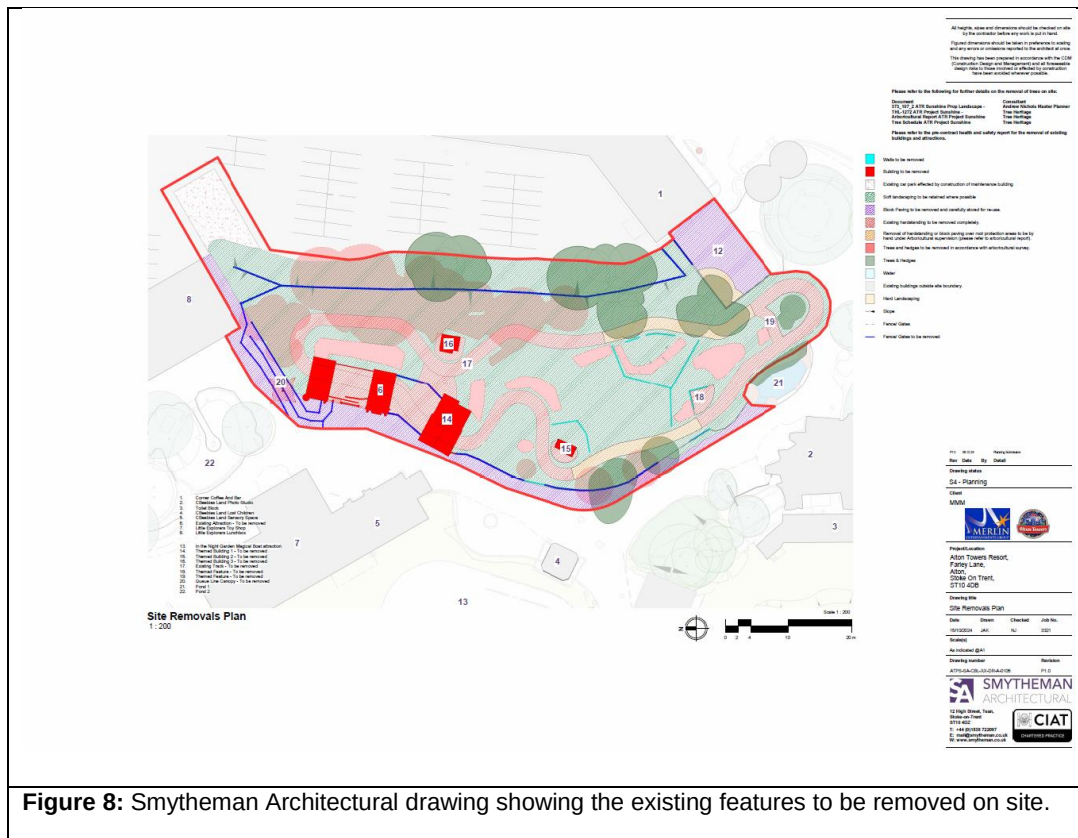
- 4.3 SMDC has produced a Character Appraisal for the area and the following observations summarise the character of the area:
- *Alton village lies on irregular ground near Castle Rock, where C12 fortifications were constructed. The Castle, parish church, and Town Head occupy a substantial plateau above 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. During this era, the gardens were opened to the public with garden fetes attended by some 30,000 visitors yet towards the end of the century it saw a decline in numbers.*
- *Early C20 saw the garden and house become Alton/Towers Ltd with the roaring twenties amassing crowds as seen previously.*
- *During World War II the estate was requisitioned by the by the home office until 1951 and in 1952, the gardens reopen yet the house is in disrepair.*
- *During the 1970s under John Broome who married the daughter of the family in residence, saw a progressive stage in the development of Alton Towers with many of the rides and areas that we see today built and/or installed.*
- *The next two decades saw major investment with new rides and attractions such as the Corkscrew rollercoaster, Log Flume, Black Hole, Congo River Rapids, Skyride and Monorail, the Runaway Mine Train, Haunted House, Ripsaw. Major rides such as Nemesis (1994) and Oblivion (1998) were also installed during this time period, and the first Alton Towers Hotel opened in March 1996.*
- *With Merlin Entertainments taking control of operations in 2007 more investment has seen the Nemesis ride re-themed, Wickerman ride plus more attractions await*

5.0 Proposal Overview

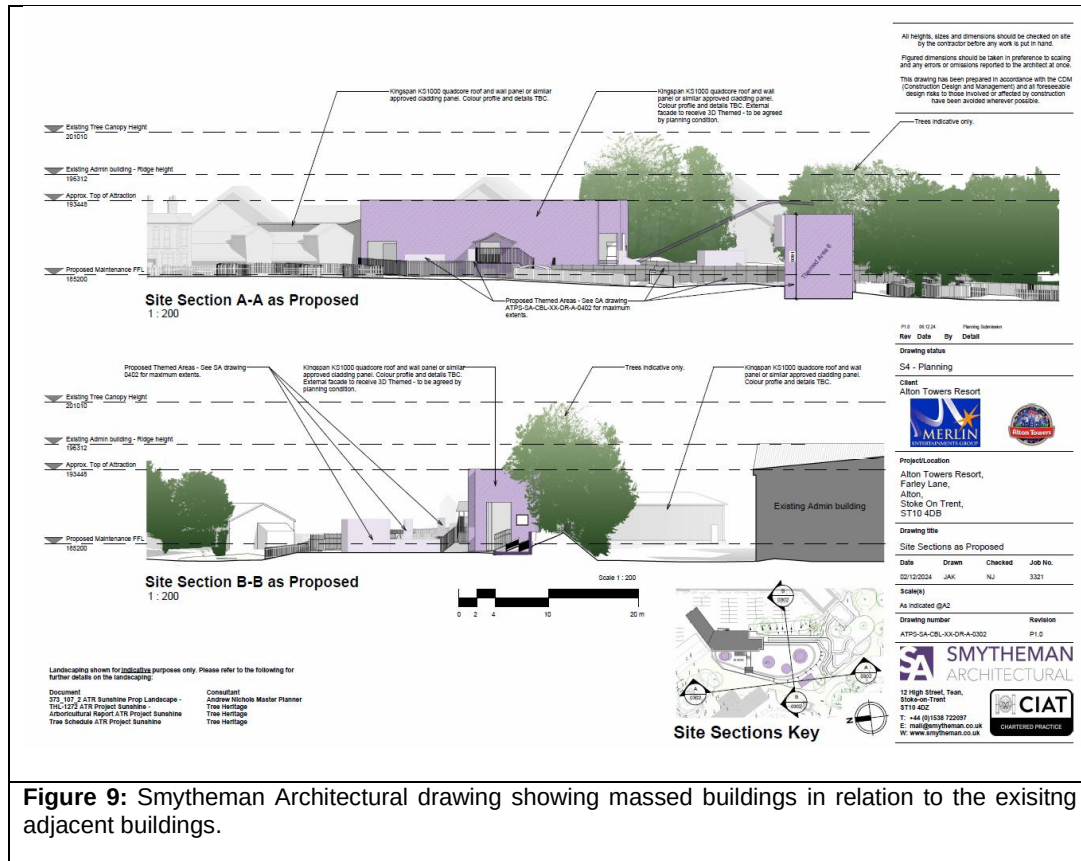
- 5.1 The proposal looks to replace the current attraction, with an existing area of 1820m² (queue line included), with a replacement themed attraction. This will incorporate the provision of a new station and maintenance building, attraction and themed areas.
- 5.2 The works include the removal of the existing attraction completely. The hard landscaped areas within the attraction to be crushed on site and if adequate, be reused in the form of hardcore within the proposed scheme
- 5.3 The proposal aims to retain as much soft landscaping as possible to fit in with the theme of this area. Hard landscaping will be implemented to queue lines consisting of block paving with Wet Pour Safety Surfacing to playground areas.
- 5.4 Construction works are more than 100m from the Grade 1 listed Park and Garden and have no effect on the listed elements situated within Alton Towers Resort.



- 5.5 A Noise Impact Assessment (NIA) for all projects at the Resort is concerned with both the attraction operational noise and construction noise. The NIA for this proposal has been carried out and identifies that:
1. Noise levels of the replacement attraction will have a negligible effect at the defined noise-sensitive receptors around the site.
 2. Noise levels from both construction traffic and operational noise is not expected to increase existing noise levels at the defined noise-sensitive receptors.

The report summary considers both construction traffic and attraction operational noise as insignificant to the remainder of the park and presents no constraints with respect to noise and as a result, any effect on the Alton & Farley conservation area is benign.

- 5.6 The external elevations consist of insulated composite panels which will receive themed finishes, the details of which are to be determined at a later date.



6.0 Relevant planning policies

6.1 Assessment of Proposal Against Relevant Policies.

- 6.1.1 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.
- 6.1.2 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.
- 6.1.3 Finally, as the application site is not listed but does sit within the conservation area, 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.

6.2 Local Plan

- 6.4.1 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:
- 6.2.2 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.

- 6.2.3 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.

6.3 Revised National Planning Policy Framework (2024)

- 6.3.1 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 section of the NPPF is **Section 16: Conserving and enhancing the historic environment.**

6.4 Section 16

- 6.4.1 Policy 207 *"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. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes, or has the potential to include, heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation"*.
- 6.4.2 Policy 208 states *"Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal"*. There are no heritage assets with close proximity that will be harmed or lost to the attraction being replaced.
- 6.4.3 Policy 216 states *"The effect of an application on the significance of a non-designated heritage asset should be considered in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset"*. There are no non-designated assets that are significantly harmed or lost to the attraction being replaced
- 6.4.4 Policy 219 states *"Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably"*. This is entirely true of the application in question which is within an area of the Resort where limited heritage value exists.
- 6.4.5 Policy 220 states *"Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies"*. We believe there is no conflict between any policies and the development regarding the heritage assets.

6.5 Historic England Guidance

- 6.5.1 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’.

- 6.5.2 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”.*
- 6.5.3 Conservation is achieved by all concerned with a significant place sharing an understanding of its significance, and using that understanding to:
- judge how its heritage values are vulnerable to change.
 - take the actions and impose the constraints necessary to sustain, reveal and reinforce those values.
 - mediate between conservation options, if action to sustain one heritage value could conflict with action to sustain another.
 - ensure that the place retains its authenticity – those attributes and elements which most truthfully reflect and embody the heritage values attached to it.
- 6.5.4 Keeping a significant place in use is likely to require continual adaptation and change; but provided such interventions respect the values of the place, they will tend to benefit public (heritage) as well as private interests in it. Many places now valued as part of the historic environment exist because of past patronage and private investment, and the work of successive generations often contributes to their significance. Owners and managers of significant places should not be discouraged from adding further layers of potential future interest and value, provided that recognised heritage values are not eroded or compromised in the process.

In other words, change is not something that should be avoided.

The proposals put forward, add value to the Alton Towers Resort without harm to any of the heritage assets within the site. The continued success of the Resort has a positive effect on heritage assets as it ‘enables these to have regular maintenance for both the gardens and the significant buildings. The Alton Towers Resort is set within the grounds of an historic garden having a theme park, which allows the public to benefit from the ‘communal value’ of the historic gardens.

This public benefit is the entire purpose behind the conservation of heritage assets.

7.0 Conclusion

- 7.1 To conclude, the proposed replacement attraction fully accords with planning policy, best practice design guidance, and conservation philosophy. Policy SO9- The replacement of attractions help to support and promote the Heritage assets and are sympathetic in their setting, keeping the assets 'alive'. Policy E3 (SA3)- Supports and benefits the Local Economy linking tourism, shopping and employment for local businesses and the wider community. Policies 189, 193 and 201 of the NPPF demonstrate the Heritage assets are not affected or impacted or contribute to their significance by the replacement attraction.

Replacement attractions enable the Theme Park to create employment and tourism from the continual updating of the Resort.

Theme Parks rely on new and innovative attractions to replace outdated attractions. As part of the planning and conservation guidance this too needs to be managed and for the reasons above, the effect of the proposals on the historic gardens of Alton Towers and the Alton & Farley conservation area setting is benign.

Bibliography

Clarke, K. 2003. *Informed Conservation*. London: English Heritage.
 British Standards Institution. (2013). BS 7913:2013. *Guide to Conservation of Historic Buildings*. London: British Standards Institution
 Historic England. 2015. *Historic Environment Good Practice in Planning. Note 1. The Historic Environment in Local Plans*. London: Historic England.
 Historic England. 2015. *Historic Environment Good Practice in Planning. Note 2. Managing Significance in Decision Taking*. London: Historic England.
 Historic England. 2015. *Historic Environment Good Practice in Planning. Note 3. The Setting of Heritage Assets*. London: Historic England.
 Historic England. 2008. *Conservation Principles Policy and Guidance*. London: Historic England.
 Ministry of Housing, Communities and Local Government. 2024. *National Planning Policy Framework*. London: Crown Copyright.
 Staffordshire Moorlands District Council. 2014. *A Local Plan for the Future of Staffordshire Moorlands*. Staffordshire: SMDC