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Planning. Design. Economics.

Heritage Impact Assessment

Alton Towers Resort: Heritage Fencing

Merlin Attractions Operations Ltd.

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1.0

Introduction

1.1

This Heritage Impact Assessment (HIA) has been prepared by Nathaniel Lichfield and Partners (NLP) on behalf of Merlin Attractions Operations Ltd. It accompanies an application for listed building consent for Type 1-R fencing at location 4.12 in the Towers Area at Alton Towers Resort.

2.0 Planning Policy

2.1 This section provides a review of policy and guidance at all levels of the planning hierarchy.

Relevant Legislation

2.2 The Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest over and above the protection provided through the Town and Country Planning Act 1990.

2.3 Under Section 72 of the Act the local planning authority also has a duty to pay special attention to “*the desirability of preserving or enhancing the character or appearance*” of conservation areas.

National Planning Policy

National Planning Policy Framework (2012)

2.4 The National Planning Policy Framework (NPPF) was published in March 2012. It states that the purpose of the planning system is to contribute to the achievement of sustainable development (para. 6), which includes the environmental duty of ‘*protecting and enhancing our ... built and historic environment*’ (para. 7).

2.5 Applicants are required to describe the significance of any heritage assets affected by a proposal, including any contribution to the significance made by their setting, in a proportionate amount of detail (para. 128). Local authorities should take significance into account in order to avoid or minimise conflict between the heritage asset’s conservation and any aspect of the proposal (para. 129).

2.6 More specifically, paragraphs 133 and 134 provide guidance with regards to the impact of proposed development on the significance of heritage assets. These paragraphs state the following:

‘Where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- *The nature of the heritage asset prevents all reasonable uses of the site;*
- *No viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation;*
- *Conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and*

- *The harm or loss is outweighed by the benefit of bringing the site back into use.*

Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.'

- 2.7 Local authorities are required to look for opportunities for new development within Conservation Areas and within the setting of Conservation Areas and other heritage assets which will enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably (para 137).

Adopted Local Development Plan

- 2.8 Preparation of the Staffordshire Moorlands Local Development Framework is ongoing. The Revised Submission Core Strategy was submitted to the Secretary of State for independent examination in September 2012 and the Council consulted on modification to the draft strategy in July/August 2013. For the purposes of these applications, therefore, reference is made to both the emerging Core Strategy and the saved policies in the Staffordshire Moorlands Local Plan (1998).

Staffordshire Moorlands Local Plan (1998)

- 2.9 The Staffordshire Moorlands Local Plan was adopted in 1998. Some of the policies have subsequently been saved. Saved policies of particular relevance to these applications include:
- a *Policies N8 and N9:* in Special Landscape Areas new development should not detract from the high quality of the landscape because of its siting, scale, design or materials.
 - b *Policy B13:* new development must be of the highest quality design, responding to the local surroundings. This policy also highlights the need to make provision for safety and security.
- 2.10 Policies R21-R24 specifically relate to Alton Towers. R21 highlights the importance of conserving and enhancing the conservation area and the amenity of local residents. R22 seeks to protect heritage assets and the peripheries of the estate from visual and aural intrusion. R23 states that where planning permission has been granted, planning conditions will require a high standard of landscaping, materials and finishes.

Alton Towers Resort Supplementary Planning Guidance (1988)

- 2.11 The District Council prepared and adopted Supplementary Planning Guidance for Alton Towers Resort in 1988. This includes a broad range of policies for the site. The main principles are to allow the economic development of the site as

a visitor attraction of national importance whilst conserving and protecting its heritage interest and preventing external impact beyond the park.

Alton and Farley Conservation Area Appraisal (2008)

- 2.12 The Alton and Farley Conservation Area was designated in 1971. The Appraisal provides a detailed description of the historic development and distinctive character of Alton Towers and the surrounding estate. Section 9.0 of the Appraisal recognises both the benefits and drawbacks of the Alton Towers theme park within the conservation area. The careful consideration of new proposals is therefore encouraged to ensure that the theme park maintains its market share, whilst preserving the significance of valuable heritage assets. The Appraisal also encourages separate paying visitors to the gardens.

Revised Submission Core Strategy (December 2011)

- 2.13 The Revised Submission Core Strategy provides more up to date emerging policies for the Staffordshire Moorlands area. Policies of particular relevance to this application include:
- a *Policy DC1 – Design considerations:* all development should be well designed and reinforce local distinctiveness. It should be designed to the highest standards; respect its surroundings in terms of scale, siting and appearance; and help to create accessible and safe public environments.
 - b *Policy DC2 – Historic environment:* development should safeguard and, where possible, enhance the historic environment, areas of historic character, interests of acknowledged importance, the settings of designated assets, conservation area and registered historic parks and gardens.

3.0

Site and Surrounds

Introduction

3.1

This section provides a brief overview of the heritage significance of the Alton Towers Resort, with particular reference to the Towers Area where the fence (4.12) subject of this application is proposed.

Alton Towers Resort

3.2

Alton Towers Resort is located in the Churnet Valley to the north of Alton Village. 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.

3.3

The Alton Towers Resort contains a number of listed buildings and a Scheduled Ancient Monument (Bunbury Hillfort). The gardens at Alton Towers are listed Grade I on the Register of Historic Parks and Gardens. In addition the site is located within the Alton and Farley Conservation Area and is within an area that is designated as a Special Landscape Area. The woodland to the south and meadows to the north-east are registered Sites of Biological Importance.

4.0

Summary of significance

The Gardens

4.1

The Conservation Plan for Alton Towers prepared in 2010 summarises the significance of the gardens as follows:

The collection of garden buildings at Alton is quite extraordinary. There is a very large number of them, concentrated into a small space. Such juxtapositions provoked adverse criticism in the nineteenth century from garden architects such as J.C. Loudon (1783-1843) and Nesfield. More recently, Pevsner said “far too many building, in far too many styles, far too close together”. Loudon and Nesfield were two outstanding garden professionals of their time and it is reasonable to conclude that the criticisms were well founded. An alternative view, set out by Michael Hussey in Country Life (1960) and supported by Michael Fisher, is that Loudon did not see the gardens in their mature state and failed to appreciate the Earl’s intention to create views of the house from the garden rather than the other way round. However, even in 1840, Loudon noted that some trees were growing out of control suggesting that the landscape was, in part at least, well developed.

Notwithstanding this nineteenth century criticism, the inclusion of the gardens and park on the English Heritage Register with a Grade I listing (one of only three in Staffordshire) is indicative of their importance today as an example of a unique piece of landscape design in England at the beginning of the nineteenth century. While the gardens may not have contributed significantly to mainstream landscape design, they are an extraordinary example of what could happen when great wealth was combined with extravagant and eccentric eclecticism. Moreover, much of the original intentions of the patrons and designers remains evident and the detailed archival material provides much by way of guidance for conservation and restoration.

The Towers Area

4.2

As outlined in the Alton Towers Conservation Plan (May 2010), the Grade II* listed Towers date from circa 1820-1840. Built by a number of architects, including James Wyatt and A.W.N Pugin, the Towers were built in a castellated Gothic style with an asymmetrical plan.

4.3

At the core of the 19th century mansion are significant portions of the house which originally stood on this site – Alveton Lodge – dating from the 18th century and possibly incorporating much earlier work. The 19th century house draws together the three main phases of the Gothic Revival (picturesque, romantic and the ideological Gothic of A.W.N. Pugin). Indeed, the growth and development of the house appear to have been haphazard.

4.4

Particularly notable features include the Talbot Gallery, the banqueting hall, the interior of the Chapel and the grand entrance from the Barbican gateway. The

long vista of some 480 feet through the southern gallery range is also of particular significance.

4.5

The Towers form part of the important garden layout at Alton Towers which is listed Grade I on the Register of Historic Parks and Gardens.

5.0 **Proposed Development**

- 5.1 The proposed development includes the erection of safety fencing (Type 1-R) at location 4.12 in the Towers Area at Alton Towers Resort, shown in drawing 373/82-6 (4.12 LBC).
- 5.2 The detailing of the proposed Type 1-R fence are shown in drawing 373/82-10 Rev B. It responds to both Health and Safety requirements and the inherent heritage and landscape sensitivities of the application site.
- 5.3 The principal objective of the proposed fence at 4.12 in the Towers Area is to ensure the safety of those visiting and working at the Alton Tower Resort. Indeed, the proposed fence, alongside the other fencing proposals, will enable continued public access and enjoyment of the Towers Area and will facilitate the wider interpretation of heritage assets, including the listed buildings, follies and gardens. The health and safety of those working at the resort will also be secured.

6.0

Impact of the Proposed Development

6.1

The proposed fence 4.12 is situated in the Towers Area, which is Grade II* listed. There is already a Type 2 fence in this location, which will be replaced by a new Type 1-R fence. This alteration has been agreed, in principle, with officers at Staffordshire Moorlands District Council.

6.2

The simplicity of the new Type 1-R fence in both design and materials will ensure that it has a negligible impact on the special interest of the Grade II* listed Towers. The architectural qualities of the Towers will still be easily read and interventions to the historic fabric will be minimised.