



**Nathaniel Lichfield
& Partners**

Planning. Design. Economics.

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

14 Regent's Wharf
All Saints Street
London N1 9RL

020 7837 4477
london@nlppanning.com

nlppanning.com

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Our ref 03224/IR/5066479v4
Your ref

Dear Sir/Madam

Staffordshire Moorlands District Council (SMDC): Application for planning permission and conservation area consent for the re-theming of existing Old MacDonald's Farmyard and Storybook Land at Alton Towers Resort

On behalf of our client, Alton Towers Resort, a company forming part of Merlin Attractions Operations Limited, please find enclosed an application for planning permission and conservation area consent for the re-theming of Old MacDonald's Farmyard including erection of new buildings and structures, demolition of the Big Top and other structures, associated landscaping and pathways.

The application which comprises the following documents was submitted via the Planning Portal (PP-02738032) on 21 August 2013:

- 1 Planning application forms (signed and dated);
- 2 Completed Certificate A and Agriculture Holdings Certificate;
- 3 Design and Access Statement (prepared by Nathaniel Lichfield & Partners);
- 4 Heritage Assessment (included within this covering letter);
- 5 Arboricultural Report (prepared by Tree Heritage);
- 6 Noise Survey (prepared by Atkins); and
- 7 Planning Application Drawings (see schedule attached at Appendix 1).

A cheque for £2,310 to cover the application fee, will be forwarded on to the Council following the submission of the application via the Planning Portal. The fee is based on 'erection of buildings', Part 2, Category 2 of the Fee Regulations. The proposed additional floor area is 417sqm (GEA). The fee for 'other operations', Category 10, has a lower fee as a site area of 0.97ha creates a fee of £1,950),



Background

Alton Towers Resort is operated by Merlin Attractions Operations Ltd. 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. It is essential, therefore, that the quality of tourist attraction on offer at the park is continually enhanced.

Site and Surroundings

Alton Towers Resort is located in the Parish of Farley in Staffordshire, some 19km west of Stoke on Trent and approximately 29km west of Derby. The smaller towns of Leek, Ashbourne and Uttoxeter are located to the north-west, north-east and south respectively. The nearest major urban conurbations are at Manchester to the north and Birmingham to the south, both approximately 64km (40 miles) from the site. The 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.

The Resort is located within the Alton-Farley Conservation Area and is designated as a Special Landscape Area. To the south of the site Abbey Wood and Park Banks are identified as 'Grade 1 County Sites of Biological Importance' and 'ancient woodlands'. The meadows to the north-east are also identified as 'Grade I County Sites of Biological Importance'. Towards the centre of the site is the Grade I historic gardens which incorporates several listed structures and buildings, including the Grade II* Towers. The Bunbury Earthworks, located to the south west of the Towers, is a Scheduled Ancient Monument.

The application site is located within the north-west corner of the Resort, adjacent to the main entrance, and covers an area of approximately 9,724sqm. It is currently occupied by a number of themed buildings and attractions collectively referred to as 'Old MacDonald's Farmyard'.

Proposals

The proposed development seeks to re-theme Old MacDonald's Farmyard, an existing family attraction area is in need of investment in order to refresh the attraction and ensure that the area remains attractive to guests. In response to a pre-application advice request SMDC has confirmed that the re-theming of existing buildings, where no new floor area is proposed does not require planning permission. The proposals forming part of this application can therefore be divided into five broad work streams:

- 1 The extension of existing buildings;
- 2 The demolition of existing buildings;
- 3 The construction of new buildings;
- 4 New character theming; and
- 5 New landscaping works and fencing (including an acoustic fence).

Details of the proposed works are set out in the enclosed application drawings and are summarised in the schedule below, alongside whether we consider planning permission (PP) or conservation area consent (CAC) is required.



Table 1 – Schedule of proposed works

Existing	Proposals	Floor areas (sqm GEA)				PP	CAC	Drawing No.
		Existing	demolished	additional	Total area			
Foam Factory	Proposed extension to create a changing area. It is noted that the retheming of the existing Foam Factory building does not require planning permission and is excluded from the proposals.	635	0	9.5	644.5	X		2813-104F and 12813-105F
Cabin Buildings	Demolition of existing cabins and erection of new Back Of House (B.O.H) buildings	309	309	246	246	X	X	2813-123F
N/A	New Toilet Block	0	0	80	80	X		2813-122F
Entrance Barn	Section of barn to be demolished and remainder re-themed. It is noted that the retheming of the building does not require planning permission.	73.8	37.4	0	36.4		X	2813-114F & 2813-113F
Boat Ride	New themed characters to be added to the ride. It is noted that the retheming of the ride does not require planning permission and is excluded from the proposals.	N/A	N/A	N/A	N/A	X		2813-126F and 2813-112F
Tractor Ride	New themed characters to be added to the ride and new bunding. It is noted that the retheming of the ride does not require planning permission and is excluded from the proposals.	N/A	N/A	N/A	N/A	X		2813-127F and 2813-117F
Big Top	Demolition of Big Top	1270	1270	0	0	X	X	2813-128F & 2813-130F
Dung Heap	Demolition of Dung Heap	34	34	0	0		X	2813-135F
Dove Cote	Demolition of Dove Cote	24	24	0	0		X	2813-136F
N/A	Installation of new festival tents	N/A	N/A	81.5	81.5	X		2813-129F & 2813-131F
N/A	Installation of new canopy – open sided structures that do not create additional floor area	N/A	N/A	0	0	X		2813-129F & 2813-131F
N/A	Installation of 3.5m acoustic fence. No additional floor area	N/A	N/A	N/A	N/A	X		2813-129F & 2813-131F
TOTAL AREAS		2,345.8	1,674.4	417	1,088.4			
TOTAL FLOORSPACE CHANGE		- 1,257.4sqm						



With respect to the proposed new themed characters for the Tractor Ride and Boat Ride the details of the characters have been excluded from the submission, at the agreement of the Council, to protect commercial confidentiality, but the maximum parameters (height, width and length) of the characters, which in effect will create a maximum 3D envelope for the each characters are identified on the application drawings ref. 2813-122F and 2813-117F. The proposed characters are small scale and the majority do not exceed 2.5 metres in height. The largest character is to be located within the Boat Ride and has maximum dimensions of 6.5m (width) by 9m (length) and 3m (height).

In place of the existing Big Top and to the west of the proposed new toilet block, it is proposed to create an open lawn area which will be covered to the north east by an open sided canopy which has a maximum height of approximately 11.5m and will contain three performance areas, raised approximately 400mm from existing ground levels. To the south of the canopy structure will be four small tents that will form, part of a children's activity area. Surrounding the open lawn and canopy to the north and east will be a 3.5m high acoustic fence, which will be appropriately themed to blend into the new themed area. The fence provides acoustic screening for the proposed development and will also screen the proposed back of house area from the main themed children's area.

The existing 'Dung Heap' attraction will also be demolished and will be replaced with low level play equipment. In total 1,674.4sqm of floorspace is proposed for demolition and 417sqm of new buildings are proposed. There will therefore be an overall reduction in floor area of 1,257.4sqm

Policy Considerations and Assessment

National Planning Policy Framework (NPPF)

The NPPF introduces a '*presumption in favour of sustainable development*' to underpin local plan preparation and decision making. National guidance seeks to protect and enhance valued landscapes and minimise impacts on biodiversity (para 109). Local authorities should set criteria based policies against which proposals for development will be judged. These should set distinctions between the hierarchy of international, national and local designated sites and have appropriate weight to their contribution (para 113).

Local Development Framework (LDF)

The statutory development plan comprises the "saved" policies of the Staffordshire and Stoke-on-Trent Structure Plan (2001) and the "saved" policies of the Staffordshire Moorlands Local Plan (1998). The Alton Towers SPG (1988) is also a material consideration in the determination of planning applications at the site, albeit is now a very old document.

The Local Plan contains four specific policies (Policy R21 - R24) in connection with Alton Towers. The planning policies in the Local Plan and the Supplementary Planning Guidance encourage economic development of the resort for tourism purposes where the effects of such development are acceptable in environmental terms. Policies within the Local Plan relating to conservation areas and listed buildings have not been saved.



Alton Towers Resort is identified within the emerging Core Strategy (Main Modifications 2013) as being within the Churnet Valley Tourism Corridor. Draft Policy SS7 supports the expansion of existing tourist attractions and facilities and the provision of compatible new tourist attractions and facilities. It specifies that any development should be of a scale and nature and of a high standard of design which conserves and enhances the heritage, landscape and biodiversity of the area and demonstrate strong sustainable development and environmental management principles.

Draft Policy SA3: seeks to develop and diversify the economy in a sustainable manner. The accompanying text identifies strong support for the growth of existing businesses and specifically mentions the need to provide support for the growth of major employers such as Britannia Building Society, JCB and Alton Towers.

We set out below the key planning issues and how the development is compliant with planning policies.

Noise assessment

The proposed re-themed area will incorporate a stage area where entertainment will be provided, during opening hours, to families who visit the area. A small themed vehicle will also travel around the area providing additional entertainment for guests. Given that these elements will incorporate speakers, Atkins has undertaken a noise assessment to inform the design of the proposed development to ensure that the entertainment that will be provided in the proposed re-themed area will not cause any adverse noise impacts. The detailed assessment has been submitted as part of the application submission, but in summary the proposed development has been design to incorporate a number of mitigation measures, including an acoustic wall and acoustic tunnel. Atkins has confirmed that if the development is implemented in accordance with the recommended mitigation strategy and in accordance with the design, as shown on the proposed plans, the proposed development will not have an adverse impact on nearby residential properties.

Landscaping

An Arboriculture Report has been undertaken by Tree Heritage. The report is informed by a tree survey that covered the Old MacDonald's Farm area down to the Spinball Whizzer ride and a total of 146 trees were identified. To allow for the proposed development one tree will be felled, this is a Goat Willow which has been assessed as being in a fair to poor condition (ref. T28). All other trees within the development site will be protected by tree protective fencing during construction (see drawing appended to the Arboriculture Report for the location of the tree protective fencing) and where there are areas where work is proposed within root protection areas, the Arboriculture Report sets out how works should proceed in these areas to ensure that the trees are not damaged.

The survey has also highlighted a number of trees that require maintenance. The majority of these trees are outside of the development area and have been brought to the attention of the Alton Towers management staff to be dealt with under their Woodland Management Plan.

In summary, only one fair to poor condition tree will be lost as a result of the proposed development and given the proposed tree protection measures that will be put in place it is concluded that there will be minimal impact on existing trees.



Additional new landscaping is proposed to ensure that the proposed development integrates into the site. It is proposed to plant 23 new Silver Birch – *Betula Pendula* trees along the southern perimeter of the Marquee and Green area. The locations of these trees are outlined on drawing 2813-132F.

Transport

There will be no increase in traffic as a result of the development proposals, since the planned re-development will largely refresh an existing area of the Resort, encouraging previous visitors to return, rather than attracting larger numbers of new visitors. The re-development of the area for a new attraction is therefore in accordance with Local Plan policy R21 since, *"...the amenity of residents living close to the estate and the main traffic routes to it..."* will be protected with no harmful effects as a result of the proposed works.

Heritage assessment

The Alton and Farley conservation area has a varied character and appearance. It includes the Alton Towers estate with its major rides and theming as well as the villages of Alton and Farley. The application site is currently occupied by a collection of buildings which form a themed family attraction.

The primary objective of the proposals is to re-theme the existing visitor attraction to enhance ensure that the Resort continues to attract families with young children. The majority of the proposed works, do not require planning permission and involve the re-painting and re-cladding of existing buildings without any alterations to their scale and setting. In this regard the works will maintain the existing character of this part of the conservation area and will upgrade their existing appearance.

The proposals also seek the demolition of buildings for which Conservation Area Consent is sought. The most notable proposals for demolition on the site involve the replacement of the existing "Big Top" with a new Village Green incorporating a covered canopy and new tent structures. The Big Top is approximately 12.5m in height and is visible in some views from beyond the resort boundary. The Big Top is used as an ancillary storage facility and is of a relatively poor appearance and has an ageing structure. The proposed replacement open sided structures are smaller in scale, the new canopy rises to a maximum of approximately 11.5m and the proposed toilet block, back of house facilities and tents are significantly lower (at approximately 3m to 7m). The proposed demolition works will therefore enhance the character and appearance of the conservation area, by removing ageing structure such as the Big Top and the proposed replacement buildings will complement the existing themed buildings.

Alton Towers Resort contains a number of listed buildings and a scheduled ancient monument and there is a statutory requirement to ensure that regard is given to the desirability of preserving a listed building or its setting or any features of special architectural or historic interest which it possesses. The application site is located some distance away from any listed buildings/ structures or their settings, and is not visible from the registered garden. As a result there will be no material change in the setting of listed buildings at the resort and the character and appearance



of the conservation area will be preserved. The scheme therefore complies with Policy R22 of the Local Plan.

Tourism and Economic assessment

Alton Towers Resort is operated by Merlin Entertainments Group Ltd. It is the UK's most popular and largest themed attraction. It is the second most visited paid-for attraction in the UK and the only top 10 visitor attraction in the West Midlands. In total, it is estimated that Alton Towers Resort generates around £43 million of income within the local economy and over £87 million within the regional economy.

Alton Towers Resort is a recognised local employer and currently employs some 2,100 workers. Alton Towers Resort is therefore one of the largest private sector employers in the District. The majority of employees live locally and the Resort provides employment to a range of skill and occupation levels.

It is anticipated that the proposals will result in the creation of approximately 30 to 50 additional jobs at Alton Towers Resort.

The new proposals will refresh an existing visitor attraction and seeks to encourage families with young children to continue to visit the Resort. This will enable the Resort to continue to be a major employer and in line with Policy R22 will continue to benefit the local area through direct and indirect spending of its visitors.

Conclusion

The proposed development will complement the existing visitor attractions on offer at the resort and will actively enhance and contribute to the long-term viability of Alton Towers Resort. It will also achieve further economic benefits in the surrounding area and is compliant with current planning policies.

We trust the above and enclosed information is sufficient for you to determine the application. Should you have any queries or require any further information, please do not hesitate to contact me or my colleague Daniel Di-Lieto.

Yours faithfully

Hannah Whitney

Associate Director

Copy	Mark Kerrigan (ATR)
	Liz Greenwood (ATR)
	James McLoughlin (MCL Projects)
	Gareth Cottam-Taylor (MCL Projects)
	Ben Dowson (Merlin Entertainments)
	Trevor Mountford (Smytheman Architects)



Appendix 1: Drawing Schedule

Planning Application Drawings	Drawing Reference	Scale
Location Plan	2813-103F	1:2500 @ A1
Site Plan as Existing	2813-101F	1:500 @ A1
Proposed Site Plan Layout	2813-102F	1:500 @ A1
Existing Survey Foam Factory	2813-104F	1:50 @ A1
Foam Factory Proposed Plans and elevations	2813-105F	1:100 @ A1
Riverbank Boat Ride Proposed New Theming	2813-112F	1:200 @ A1
Entrance Barn Existing Survey	2813-113F	1:50 @ A1
Entrance Barn Proposed Plans and Elevations	2813-114F	1:100 @ A1
Tractor Ride Proposed Layout	2813-117F	1:200 @ A1
Marquee and Green Proposed WC Facilities	2813-122F	1:100 @ A1
Back of House Facilities Proposal	2813-123F	1:100 and 1:200 @ A1
Tractor Ride Existing Layout	2813-127F	1:200 @ A1
Marquee and Green Existing Layout	2813-128F	1:100 @ A1
Marquee and Green Area Scheme	2813-129F	1:100 @ A1
Demolition site plan	2813-133F	1:500 @ A1
Marquee and Green Area Existing Elevations	2813-133F	1:100 @ A1
Marquee and Green Area Proposed Sections	2813-131F	1:100 @ A1
Marquee and Green Landscaping Plan	2813-132F	1:100 @ A1
Existing Dung Heap	2813-135F	1:100 & 1:50 at A3
Existing Dovecote	2813-136F	1:50 at A3