

From: [Steve Massey](#)
To: [Lisa Li](#)
Cc: [Planning Comments \(SMDC\)](#)
Subject: SMD/2024/0136 - Dark Forest, Alton Towers Resort
Date: 20 May 2024 16:49:36
Attachments: [image001.png](#)

Lisa

Summary: no objection subject to conditions.

I have the following comments on this application:

My site visit and discussion with the applicant has established that the impact on existing trees is, in general, unlikely to be substantial.

The majority of the proposed development footprint would be located on existing, long-established tarmac surfacing, with minor encroachment beyond onto unmade ground within the wooded margin on the eastern side of the tarmac, which would be partly within the Root Protection Areas (RPAs) of the edge trees. However, even here, apart from corner weight-bearing pads for the containers, any extension to hard surfacing would be minimal depth of hardcore, thus retaining permeability to water and air, and unlikely to require removal of significant roots. The proposed footprint position has already been amended to provide additional clearance from the mature Yew trees (Denoted T252 and T5131 in the tree survey, and of Retention Category A), whilst the Sycamores are individually of low quality (Trees T249 and T250, Retention Category C) and are also more visually contained within the body of the woodland and further from public view so the slightly increased potential impact on these is of less consequence.

There would be a need for adjustment of the very slightly sloping site to provide a level base for the complete proposed new structure, but again this would largely be within the existing hard-surfaced area.

The application arboricultural report's Arboricultural Impact Assessment plan indicates the proposed removal of a Category U Sycamore (T1) at the south-western corner, and up to 3 Category C Birch trees (T5128, T5129 and T5130) at the north-eastern corner. The Sycamore would not be directly affected by the proposed development, but has been found to have several structural defects which in combination suggest that the tree has anyway a very limited remaining safe useful lifespan regardless of development, and precautionary removal in association with the scheme is therefore indicated in the interests of safety, and this is agreed as appropriate. In practice, not all of the 3 Birch may need to be removed as the precise alignment of the proposed development as a straight linear structure along a curving existing hardstanding may allow for the stem positions of at least some of these 3 trees being retained outside the development footprint, and with minimal impact within RPAs. But in any event these are again trees of lower quality and refusal of planning permission due to impact on C-grade trees would not normally be appropriate or sustainable.

There would be a need for minor crown-lift pruning to several of the trees overhanging the site in order to provide/maintain clearance for removal of existing containers and installation of the proposed new structure, but such pruning – assuming carried out to good arboricultural standards – would not be detrimental to condition or amenity value of the trees.

Overall, any loss of existing trees and impact on retained trees would have little detrimental effect on the amenity value and condition of the adjacent woodland areas, and in turn very little discernible impact on the landscape structure and character of this part of the Resort/Conservation Area or the setting of the Towers building and surrounding historic park/garden.

I have no objection to this application, but would request that the following conditions be imposed in the event that planning permission is granted:

1. No trees, shrubs or hedgerows shall be removed or pruned other than those to which such work is directly required in order to accommodate the approved development or as otherwise indicated in the Tree Heritage Arboricultural Report reference THL-R24-11-2 submitted in support of the application hereby approved, unless otherwise approved by the LPA. There shall be no removal or pruning of any trees, shrubs or hedgerows during the bird nesting season (nominally March to August inclusive), unless otherwise agreed by the LPA and in this case only following careful inspection by a competent person immediately prior to removal in order to establish that such trees, shrubs or hedgerow are not in active use by nesting wild birds.
2. The first action on commencement of development, prior to any further action (including any demolition, site clearance, site stripping, site establishment or formation/improvement of temporary/permanent access) shall be the erection of temporary tree protection barriers and advisory notices for the protection of the existing trees to be retained, in accordance with guidance in British Standard 5837:2012 *Trees in Relation to Design, Demolition and Construction – Recommendations*, and as set out in the Tree Heritage Arboricultural Report reference THL-R24-11-2 submitted in support of the application hereby approved, and these barriers and notices shall be retained in position for the duration of the period that development takes place other than any temporary removal or repositioning required for access to carry out accommodation tree works, unless otherwise agreed by the LPA. Within the fenced areas there shall be no excavation, changes in ground levels, installation of underground services, provision of hard surfacing, passage of vehicles, storage of materials, equipment or site huts, tipping of chemicals, waste or cement, or lighting of fires unless otherwise agreed by the LPA.
3. Any mature tree to be removed or to have substantial crown pruning operations carried out shall first be carefully inspected for the potential to provide bat roosting opportunities. Any tree which has such potential (which could include cavities, splits, decay pockets, hollow stems or branches, areas of loose bark, dense ivy cover or dense epicormic shoots) shall be subject to a further detailed and if necessary climbing inspection by a licensed bat worker immediately prior to felling or pruning, and all felling or pruning of such trees assessed as having moderate or greater potential for roosting shall take place in the presence of the bat worker who can then immediately advise on appropriate measures if bats are encountered during dismantling, felling or pruning operations.
4. All accommodation tree works required to provide access for and clearance from the development hereby approved shall be carried out in accordance with British Standard 3998:2010 *Tree Work – Recommendations*.

5. All new hard surfaced areas within the Root Protection Area of any retained tree, as indicated in the Tree Heritage Arboricultural Report reference THL-R24-11-2 submitted in support of the application hereby approved, shall be constructed to a no-dig specification (whether left as exposed hardcore/aggregate finish or with porous bound surfacing) in accordance with the Smytheman Architectural "No Dig Surfacing Detail" Drg. No. ATFB-SA-DF-XX-DR-A-1101 submitted in support of the application hereby approved.

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Development Services

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