

From: [Hannah Varley](#)
To: [Planning Comments \(SMDC\)](#)
Subject: FW: DOC/2024/0013 - Alton Towers -
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From: Steve Massey
Sent: Monday, July 29, 2024 7:11 PM
To: Hannah Varley
Cc: Jane Curley Ben Haywood

Subject: DOC/2024/0013 - Alton Towers -

Hannah

I'm sorry for the delay in reviewing this Discharge of Conditions submission and providing comments.

Condition 22 of planning permission SMD/2022/0556 (for a new building to house an indoor attraction, Project Horizon, along with associated works) requires that:

“Within 6 months of the date of this permission, the existing Alton Towers Long Term Plan Technical Report D: Woodland Management Plan, dated 2011 and covering the period 2011 – 2019, shall be fully reviewed and updated to cover the period 2023 – 2033, including objectives and actions which reflect the evolution and development of Alton Towers since the Woodland Management Plan was first drawn up, and shall be submitted to the local planning authority and approved in writing. The reviewed Woodland Management Plan shall include consideration and proposals for the Abbey Woods 1 and Abbey Woods 3 zones (as set out in the 2011 report) specifically to take account of the landscape, visual and heritage impacts of the development hereby approved. Any replacement or reinforcement planting proposed for the Abbey Woods 1 and Abbey Woods 3 zones set out in the updated Woodland Management Plan so approved shall be fully implemented before the end of the first available dormant season (November to February inclusive) following completion of the development hereby approved. The trees, shrubs etc. planted in accordance with this condition shall be properly maintained for a period of 5 years following planting. Any plants which within this period are damaged, become diseased, die, are removed or otherwise fail to establish shall be replaced during the next suitable season.” the submission of a reviewed and updated Woodland Management Plan

The submitted “Alton Towers Resort Woodland Management Plan 2023 – 2033” (hereafter referred to as “the WMP”) has been drawn up by local arboricultural consultants Tree Heritage Ltd on behalf of Alton Towers Resort, and includes an Alton Towers Key Designations Plan (prepared by Lichfields) and a Woodland Strategy Plan

(prepared by Andrew Nichols).

The WMP sets the site and its woodlands in the current physical/landscape/land use and historical contexts, providing descriptions of the woodland compartments and outline of recent/on-going management work under previous editions of the WMP. The compartments are, appropriately, carried forward from previous editions. Long Term Visions & Management Operations, Management Prescriptions/Operations, and outline Work Programmes for the individual compartments are generally appropriate and acceptable.

However, there are some points I would raise where context could be improved/clarified, and management objectives/work programme better related to the present site/current issues and how these have evolved since the WMP was first drawn up. Noted as follows:

1. Section 1 'Background Information' refers to the Ancient Woodland status of the Churnet Valley woodlands including areas within Alton Towers, but it is somewhat surprising in a WMP that the boundary/extent of registered Ancient Woodland is not shown on either of the appended plans, in particular the Key Designations Plan. Similarly the Alton and Farley Conservation Area is noted but again not shown on the appendices plans (I appreciate that the whole of the Resort is within the Conservation Area, but it would be appropriate to show this graphically and in its wider context). Whilst the Abbey Wood SBI is mentioned, coinciding with the Barbary Gutter Ancient Replanted Woodland site but also including Horseshoe Wood (not Ancient Woodland) at the western end of the Resort, the Alton Park SBI (wood pasture/parkland BAP priority habitat) at the north-east corner of the Resort is not mentioned or shown but is also relevant to woodland management issues and any/all SBIs should be noted and shown. It would also be useful and relevant to show Public Rights of Way on the Key Designations Plan. I'd suggest a larger scale Key Designations, perhaps of less extensive surrounding area beyond the Resort, but more comprehensively and more clearly denoting the various designations which are of relevance to the WMP.
2. Section 2 'Woodland Information' refers to the site's location within Natural England's Potteries and Churnet Valley Natural Area. However, I would suggest that a more detailed level of landscape character context should be given, with reference to Staffordshire Moorland District Council's Landscape and Settlement Character Assessment (https://www.staffsmoorlands.gov.uk/media/947/Landscape-and-Settlement-Character-Assessment-LSCA-2008---Main-Report/pdf/Landscape_and_Settlement_Character_Assessment.pdf?m=1482503691390) within which Alton Towers is located within the 'Dissected Sandstone Cloughs and Valleys' landscape character type. Broad objectives and work programme priorities within the WMP could then be related to the landscape planning and management issues and guidelines of the character assessment.
3. The boundaries of the various woodland compartments in the WMP could be more clearly denoted than they currently are on the Landscape Strategy Plan appendix.
4. Although the woodland compartments are appropriately carried forward from previous versions of the WMP, I would suggest an additional compartment (or two) could also be added covering the Alton Park SBI (see note 1 above) and adjacent woodlands (BAP priority habitat sites) around the north-east corner of

the Resort site, between Wootton Lane and the existing 'North of Nicklin's 1, 2 & 3 compartments. (See also note 5 below referring to recent developments).

5. Condition 22 refers to updating the WMP to reflect evolution and development at Alton Towers since the plan was first written (in 2006 and updated in 2011), however there is little or no reference in the 2023-33 reviewed WMP to the several major developments constructed and/or planned/approved in the interim and it would be useful to address this in order for the WMP to demonstrate at least in strategic terms where how and when these developments may influence woodland management objectives, compartment work programmes and their prioritisation. (e.g. Smiler c.2013, Enchanted Village c.2015, AT Hotel extension c.2015, Wicker Man c.2018, Stargazing Pods c.2019, seasonal Car Park P improvements c.2019, and recently approved Project Horizon under SMD/2022/0556 which itself gives rise to the conditioned requirement to review and update the WMP. The Car Park P site includes designated wood pasture, and is adjacent to broadleaved woodland priority habitats, which are not within any woodland compartments of the 2011 WMP – hence my suggestion at point 4 above for one or two new compartments to be added.
6. The strategic work programmes for the various compartments contain plenty of proposals for felling/clearance, but are rather light on re-stocking (whether by planting, natural regeneration or a combination of these). I appreciate that the clearance and felling is for good reason and/or of necessity (e.g. for plant health reasons to remove *Phytophthora*-infected Rhododendron and Larch, to control invasive non-native species especially within Ancient Woodland areas, to re-establish access and key views along woodland paths and rides, and in a few cases to maintain operational safety for Resort attractions). It is also appreciated that it is often beneficial or even necessary to carry out some clearance in order to facilitate restocking. However, over the operational life of the WMP to date there has been substantial if intermittent clearance in some areas but relatively little strategic replanting or successful regeneration, and it would be good to see greater emphasis given to restocking with more S.M.A.R.T. proposals. For instance, again in the specific context of the Project Horizon development, Condition 22 is clearly anticipating some high priority actions within the Abbey Wood 1 & 3 compartments. In addition, I have previously suggested that priority should be given to restocking in the 'West of Farm' compartment following previous clearance of Rhododendron here, where the large number of vehicles parked along the access road between the security lodge at the staff entrance and the admin offices are visually intrusive in views into the site from Farley Lane adjacent; the reviewed WMP currently denotes West of Farm as "Strategic Screen – no intervention in the short term" but I'd suggest that some high priority reinforcement planting in this compartment would be greatly beneficial.

I hope these comments can be seen as constructive to fine-tune the WMP in order to best meet its purpose and parameters as set out in Condition 22 and provide a relevant and resilient strategy for woodland management and resource prioritisation over the plan period.

Steve Massey Arboricultural Officer

Development Services

High Peak Borough Council and Staffordshire Moorlands District Council

Tel: **01538 395788** Mob: **07545 423071**

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