

Alton Towers Farley Lane SWT Comments

Application Reference: SMD/2024/0579

Location: Alton Towers, Farley Lane

Proposed Development: 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

Staffordshire Wildlife Trust has been asked to review the above application as part of a service level agreement with Staffordshire Moorlands District Council to provide ecology advice regarding planning and development management functions.

We recommend a **holding objection** as we have insufficient information to assess this application. We require the following:

- Further bat surveys as detailed in section 6 of the PEA
- GCN surveys as detailed in section 6 of the PEA
- As detailed in the PEA, the application needs to demonstrate that the whole process from proposal to implementation should consider the 'mitigation hierarchy' – avoid, reduce, compensate and enhance. We would like to see evidence that the mitigation hierarchy has been considered and applied.

We have the following additional comments some of which need addressing:

CEMP

Ecology detail seems to be yet to be included as this section contains contact details of a consultant. This should include measures for breeding birds, avoiding entrapment of mammals etc. and a management plan to avoid the spread of Rhododendron during works.

Application Form

The publication date of the metric is given as '29/11/2023'. This date is incorrect. One of the pieces of the minimum information requirements that must accompany a planning application that is subject to the biodiversity gain condition as per planning practice guidance is '*the publication date of the biodiversity metric used to calculate that value*'. Please either update the application form to amend this or supply the correct date in another format.

PEA

UK Hab carried out 25th November, this is not an optimal time of year for undertaking grassland surveys and this is acknowledged in the limitations. We are happy with the explanation in the limitations.

The PEA recommends further bat surveys and Great Crested Newt surveys and we agree these are required before a decision can be made on this planning application. These should be carried out as detailed in the PEA.

The on-site habitat creation and enhancement contains woodland and individual trees which are habitats of medium distinctiveness and are therefore significant on-site enhancements. These will need to be secured through a legal agreement and managed and monitored for 30 years.

As per the PEA, 0.71 habitat units are required to be delivered off-site. To satisfy trading rules, this should include at least 0.07 unit of medium distinctiveness woodland habitat, and 0.42 units of individual tree habitats. Alternatively, habitat of high or very high distinctiveness may be used to offset the loss of medium distinctiveness habitats. As these are at least medium distinctiveness they will need to be secured through a legal agreement and managed and monitored for 30 years.

It has been suggested that the off-site BNG could be provided within the wider ATR land ownership. Any off-site biodiversity gain site would need to be registered with Natural England on the Biodiversity Gain Sites register and would require a separate legal agreement to secure management and monitoring.

Conditions

A pre-commencement condition is required for submission and written approval of an updated CEMP to include precautionary measures for ecology as detailed in section 5.14 Invasive Species and 6.3 Mitigation Measures of the Project Sunshine, Alton Towers, Preliminary Ecological Appraisal, dated 19th December 2024 by baker consultants. The updated CEMP should cover site preparation, construction and operational phases of the development. The development should take place in accordance with the CEMP.

The condition should also specify that the applicant should ensure that the site/construction manager and all relevant site operatives have reviewed the CEMP by means of a sign-off system before they commence any works.

There may be further conditions following the additional surveys.