

Town and Country Planning (Environmental Impact Assessment)
Regulations 2011

Screening Opinion

Site Address

Land at Alton Towers Theme Park Resort, Alton, Staffordshire Moorlands ST10 4DB.
Parish of Farley, Staffordshire Moorlands.

Grid reference: SK 079 433

Proposal

Demolitions and removal of existing buildings and ride structures. Construction of new ride including tunnels, ground level changes, maintenance building, station, shop and pre-show building all with combined maximum total floor area of 1130sqm, single storey building to maximum height of 6m and two storey to maximum height of 7.5m. The new ride would have a 14.5m maximum height above existing ground levels. Approximately 100 trees would be lost the majority in U and C but with two in category A and 25 in category B.

Applicant

Merlin Attractions Operations Limited (Alton Towers Resort).

Agent

Hannah Whitney, Planning Director
Nathaniel Lichfield and Partners

Planning Application Case Officer

Jane Curley
Staffordshire Moorlands District Council

EIA Assessment

Arne Swithenbank
Staffordshire Moorlands District Council

Decision

An Environmental Impact Assessment **is not required**.

Justification

Schedule 1

Not applicable. The proposed development does not fall within any of the categories listed in this Schedule.

Schedule 2

The proposed development falls within Schedule 2, section 2, paragraph 12: Tourism and Leisure category (d) Theme Parks.

Sensitive Area Test

The site is not within an environmentally sensitive area strictly as defined in Part 1, Section 2(1) of the Regulations.

Threshold and Criteria Test

Current EIA guidance headed **Annex: Indicative Screening Thresholds** states at paragraph 057:

“The criteria and thresholds in column two represent the ‘exclusion thresholds’ in Schedule 2 of the Regulations, below which Environmental Impact Assessment does not need to be considered (subject to the proposal not being in a sensitive area).”

The threshold relevant to this proposal stated in column two is whether the development area would exceed 0.5 hectares. In this case therefore an EIA must be considered as the development proposal would occupy an area of c.1.7 hectares, more than three times the indicative threshold.

The guidance goes on to give Indicative criteria and thresholds for whether significant effects are likely. For this category of development the criteria are defined as:

“New theme parks which are expected to generate more than 250,000 visitors per year. Major new tourism and leisure developments which require a site of more than 10 hectares.”

The proposal under consideration here is not a "new" theme park but, in part, a replacement of a previously developed area forming a relatively small part within a large existing resort.

It should be noted that in the introduction to this section of the guidance at paragraph 057 it is stated that:

“The figures in column three are indicative only and are intended to help determine whether significant effects are likely. However, when considering the thresholds, it is important to also consider the location of the proposed development.”

Paragraph 18 of the current Government Guidance for Environmental Impact Assessment at:

<http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/screening-schedule-2-projects/> states:

“It should not be presumed that developments above the indicative thresholds should always be subject to assessment, or those falling below these thresholds could never give rise to significant effects, especially where the development is in an environmentally sensitive location. Each development will need to be considered on its merits.

At paragraph 058 of the guidance (Column 3) the key issues for this category of development are given as being:

“Visual impacts, impacts on ecosystems and traffic generation.”

Part II Section 4(6): Schedule 3 Selection criteria for screening Schedule 2 Development

1 Characteristics of the development

Size

1.1 The size of this proposal with an overall area of c. 1.5 ha, being 3x the trigger threshold, makes it a requirement to consider whether there would be significant effects sufficient to warrant an EIA. Also, height and mass need to be considered. Top heights are proposed similar to or slightly less than past approved developments within the vicinity such as the existing nearby Nemesis at 202.62m AOD. The proposed development would have a maximum top height of 202.5m AOD. Guidance gives an indicative visitor number threshold of 250,000 to mean EIA is more likely to be needed. The proposal is set to bring an additional 120,000 visitors annually along with a 5% increase in traffic. It is stated that the visitor number increase would result in a total which would be less than the numbers in 2010 and 2014 but within the limits of the Long Term Plan for 2017.

Cumulation with other development

1.2 The cumulative impact upon the landscape of this proposal along with other development needs to be considered. In this case there may be cumulative impacts due to other similar approved development including tall theme park ride structures in the immediate vicinity.

Use of natural resources

1.3 The use of natural resources is not found to be a significant factor in the proposed development. If however it were found for example that water was to be utilised as part of the operation of the completed development this could become a factor. The assessment is made here on the basis that it is not.

Production of waste

1.4 Waste production is not found to be a feature of this development.

Pollution and nuisances

1.5 Noise implications would need to be assessed but are not considered likely to be a significant issue at this location, in the heart of the existing resort, as the proposal is to

design the development so as not to exceed existing background noise levels. A 5% increase in traffic is predicted and the Highways Authority has been consulted and advise that this would not amount to a significant impact.

Risk of accidents

1.6 Risk of accidents for the public in the vicinity is not considered likely to be a significant environmental factor of this proposal in its operation.

2 Location of the development

2.1 The existing land use is part wooded and part existing theme park. The site is within the defined county landscape character type of Dissected Sandstone Cloughs and Valleys which in the SMDC Churnet Valley Landscape Character Assessment is further sub-divided and the site falls within the Alton and Oakamoor sub area (1,a). Alton Towers Resort is identified as a 'key opportunity site' and development at the resort is specifically addressed as follows: "Development within the Alton Towers Resort Key Opportunity Site (KOS) should take account of the sensitive nature of the Registered Historic Parkland and its setting. Development that substantially alters the remaining historic landscape within the KOS boundary should seek to maintain the character of the parkland landscape, retaining and reinforcing parkland trees. New development proposals that extend into the wider parkland should take account of the parkland setting, and where possible reinforce the vegetation structure to enable new development to be absorbed within this important landscape. Consideration should be given to providing pedestrian access only to the Registered Park and Gardens within Alton Towers. To minimise the impact of vehicle movements associated with the Resort sustainable transport measures and practice should be considered such as the creating of off-road cycle routes to this attraction and partnership working with Moorland and City Railway Ltd to extend local rail access. Necessary road improvements associated with the expansion of the facility should be in-keeping with the character of the area and avoid creating intrusive urban features."

2.2 There are some 30 or so listed structures within the Alton Towers site. Prospect Tower is a Grade II* Listed Building at 75m away from the proposal and the site is within the Alton and Farley Conservation Area. These designations embody significant constraints with which the proposal could have the potential to conflict. However, given the scale of the proposal relative to the overall scale of the existing established theme park, any such conflicts are not considered to result in an impact of such significance to warrant EIA. The character of the proposed development site as seen from within and close to the proposed site area is already that of an intensively developed and used theme park in a generally wooded/landscaped setting. The proposed development would inevitably intensify this character locally, and at its northern end would allow such character to spread slightly further than existing into the currently non-accessed early-mature woodland screening. It is considered however that this would not fundamentally alter the existing landscape character of the site and its immediate surroundings and that notwithstanding the Conservation Area designation and Registered Historic Park/Garden status the impact on immediately local landscape character would not be of sufficient significance to require an EIA.

2.3 Nonetheless it must be recognised that landscape character and topography, and the relationship of the proposed development to it, is a significant factor in the assessment of this proposal. Assessments to current recognised practice standards would need to accompany the application in respect of both landscape character and visual impact and separately in respect of ecology and trees / woodlands.

3 Characteristics of the Potential Impact

3.1 The proposal would result in a quite large and a somewhat unusual development to this landscape which strictly would not be in character although it is likely that it would be largely subsumed within the larger surrounding theme park.

3.2 Visual impact on wider, more distant views would potentially arise on the principal views across the Churnet Valley from Viewpoints 12 and 13 to the south. Initial photomontages from the Viewpoints submitted with pre-application documents suggest that there would be very limited visibility of small sections of "Highpoint A" seen through the existing tree cover, but "Highpoints B and C" would be screened. It is understood that as the design has evolved, the highpoints are likely to be higher than shown on these initial photomontages, but still marginally lower than the Nemesis top beam level. The proposed ride would be of timber truss construction set within a wooded backdrop and foreground, and the few visible parts would therefore be unlikely to stand out notably in these longer range views. It is understood that one or more of the highpoints would be enclosed within "sound tunnels" which, where present, would also have the benefit of avoiding the visual impact arising from the movement of ride cars when in operation.

3.3 The overall proportion of the field of view from Viewpoints 12 and 13 theoretically occupied by the proposed new ride would be small, probably less than one-hundredth of the total on-site woodland area normally visible with the naked eye in these viewpoints. Within this small area, retention of the majority of existing trees/woodland would greatly limit actual visibility of the development, and in conjunction with extensive unaffected tree cover in front of and behind the proposed ride site, the visual impact of the required tree removal itself would also not be marked in longer views.

3.4 It is considered that the visual impact of the proposed ride would be notably less than the existing visual impact of the nearby Nemesis and Air rides, the Skyride cable cars crossing the formal gardens/Slain Hollow, and the AT Hotel and Splash Landings complex some 500m to the east. The complete Resort, including theme park/attractions, accommodation, car parking and transport infrastructure etc is remarkably well screened considering the scale, intensity and market position of the operation. The additional cumulative visual impact of the proposed development taken in conjunction with existing development (most notably those features mentioned earlier in this paragraph) would be very low.

3.5 The size of the affected population is chiefly that of the settlements of Alton and Farley and the dispersed population of the rural surroundings. These are not large populations in the EIA context. The identified impacts are specific and judged relatively limited in the EIA assessment context so as not to be considered complex nor of high magnitude. There is though a strong likelihood that the impacts, chiefly landscape visibility and character impacts, and potentially noise, which have been identified will occur. The impacts whilst likely to seem permanent in nature would ultimately be reversible. The loss of trees has been considered by the Council's Trees and Woodlands Officer who does not consider the losses to trigger EIA.

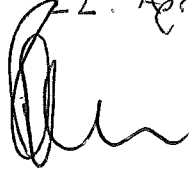
4 Conclusions

4.1 Although the area of the development would exceed one of the indicative thresholds for determining significance and thence whether or not there is a need for an EIA, by reference to the guidance on the Government website at: <http://planningguidance.planningportal.gov.uk/blog/guidance/environmental-impact-assessment/>, and noting the consideration above in sections 1 to 3 it is concluded that, notwithstanding the undoubted importance of giving thorough consideration to landscape character, and visual impact; to trees and woodlands and noise impacts, an EIA is not required. In reaching this conclusion substantial weight has been given to this not being a 'new' theme park and that this proposed new element is predicted in the applicant's submissions to result in 120,000 new visitors p.a., substantially fewer than the indicative visitor number threshold if this were a new theme park. A 5% traffic increase is not considered significant by the Highways Authority. Close consideration has been given to the impact on and loss of woodland. The affected woodland area has been shown to be of low grade and the impacts have been judged of low magnitude with limited or no wider landscape reach. There is potential for some significant interaction in views with Listed Structures and the registered historic park / garden but it is anticipated that these impacts can be mitigated by design amendments. Likely cumulative impacts would be chiefly contained within the developed resort area and would not result in significant 'spread' of impacts over or beyond those of the resort as existing.

Report prepared by:
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Signed *A. D. Swithenbank*
Dated *22. April. 2015*

Delegated Authority:
Robert Weaver
Head of Regulatory Services

Signed 
Dated *22.4.15*