

Biodiversity Net Gain (BNG) – Validation Statement

Proposed Walk-Through Attraction Building on the Former Enterprise Site.

Alton Towers Resort, Farley Lane, Alton, Staffordshire

ATWT-SA-XS-XX-BNG-A-0001 Rev P1

This statement is submitted to address the Biodiversity Net Gain (BNG) requirements set out within Staffordshire Moorlands District Council's Local Validation Checklist and Regulation 5 of the Town and Country Planning (Development Management Procedure) (England) Order 2015.

The application site lies wholly within an existing operational area of Alton Towers Resort and comprises previously developed land only. The red line boundary consists entirely of buildings, sealed hardstanding, block paving, ride infrastructure and circulation space. There are no priority habitats, semi-natural habitats, hedgerows, trees, soil-based substrates or areas of vegetation present within the application boundary. Any incidental habitat present is de minimis in nature and amounts to significantly less than 25 square metres.

The proposed development comprises the construction of a new walk-through attraction building located entirely within the existing developed footprint shown on the submitted plans. The proposal does not involve:

- the loss or alteration of habitat;
- habitat clearance or soil stripping;
- removal of trees or effects to tree canopies; or
- encroachment into undeveloped or vegetated land.

In accordance with Schedule 7A of the Town and Country Planning Act 1990, the Statutory Biodiversity Metric assigns zero biodiversity unit value to buildings and sealed hardstanding. As the baseline condition of the site contains no qualifying habitats capable of generating biodiversity units, and any habitat present is below the 25 sq m minimum area threshold, the development results in no loss of biodiversity units.

Where a development site contains no baseline biodiversity units, the mandatory requirement to achieve a minimum 10% biodiversity net gain cannot be meaningfully applied. On this basis, the proposal is considered to fall within the BNG de minimis position and is BNG-exempt in practice.

Accordingly:

- A Biodiversity Metric calculation is not required; and
- A Biodiversity Gain Plan is not required for validation purposes.

This statement is therefore submitted to confirm that the application complies with SMDC's validation requirements in respect of Biodiversity Net Gain.