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Head of Planning Planning Department Runnymede Civic Centre Station Road Addlestone KT15 2AH

Date: 17 December 2021

Our ref: 04858/45/NT/NWh/20335930v2

Your ref:

Dear Sir/Madam

## The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated)

# Thorpe Park New Rollercoaster Project – Request for a formal Environmental Impact Assessment Screening Opinion

On behalf of our client, Thorpe Park (a company forming part of Merlin Attractions Operations Limited), we request that the Council provides a formal screening opinion to confirm whether there is a requirement for an Environmental Impact Assessment ('EIA') in respect of the proposed development at Thorpe Park on Staines Road in Chertsey, Surrey. This request is made in pursuance of Regulation 6 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as updated) ('the Regulations').

To enable your consideration of this issue, we set out below the following information:-

- 1 Description of the Site and its surroundings;
- 2 Description of the proposed development; and
- 3 Review of the requirement for an EIA.

Item 3 is dealt with by reference to a preliminary review of the Site and its surroundings and a consideration of the other issues set out in the EIA Regulations which take into account recent case law.

In summary we consider that the proposed development will not give rise to the need for EIA. We outline below the analysis undertaken to reach this conclusion.

### 1. Description of the Site and its surroundings

Thorpe Park is an amusement park located in Surrey, to the east of Thorpe Village, between Egham (approximately 3.5km to north-west), Staines (approximately 3km to the north) and Chertsey (approximately 1.9km to the south-east). The wider Thorpe Park covers approximately 109 hectares and contains over 30 rides and leisure attractions, a themed hotel and other buildings that support the various facilities associated with the Park.



The Site which is the subject of this screening request is located in the south-east corner and was previously occupied by 'Loggers Leap' - a water based ride which closed in 2015 and has not been operational since, as well as 'Lumber Jump', 'The Rocky Express' and 'Timber Tugboat'. Remnants of the rides by way of remaining structures exist within the site boundary. In the west, low lying buildings previously used in association with Loggers Leap front onto an open paved area. To the north are other rides including Samurai and the Saw.

The majority of the Site is heavily vegetated and overgrown including trees and shrubs. Centrally, the site surrounds an 'inlet' of water.

Thorpe Park is accessed from Staines Road (A320) and vehicles park in the main car park, located to the north east of Abbey Lake. A coach drop off area is located to the north of the main car park. Public admission to Thorpe Park is via a footbridge located between Abbey and Fleet lakes.

Surrounding the Park are three water-filled former gravel pits: Manor Lake (to the north-west), Fleet Lake (to the north-east), and Abbey Lake (to the south-west). Manor Lake separates the main theme park from (the former) Thorpe Village. The three lakes are designated as a Site of Nature Conservation Importance (SNCI).

To the north of the Site, beyond Fleet Lake is open land which provides flood relief/compensation areas. The eastern boundary of the Park is formed by Staines Road (A320). To the east of this, is open land, which includes more worked out gravel pits, a marina and residential development on both sides of the River Thames.

The southern boundary of Thorpe Park is formed by Monks Walk (public footpath No. 51) a public footpath that links Thorpe Village to Chertsey and runs directly to the south of the Site which is the subject of this screening request. The land to the south of Monks Walk is identified as a Site of Special Scientific Interest (SSSI), with St Ann's Lake being one of the waterbodies of the London South West Waterbodies Special Protection Area (SPA) and Ramsar site (Wetlands of International Importance), which places emphasis on the need to conserve bird habitats, namely wintering Gadwall and Shoveler populations. The adjacent Britannia Arena is also a SNCI.

Thorpe Park is located within the Green Belt. The majority of Thorpe Park lies within the functional floodplain (Flood Zone 2 or 3) as indicated by Environment Agency mapping. The Thames Basin Heaths SPA 5-7km Buffer zone covers all of Thorpe Park, as well as the area to the north and east of Thorpe Park.

The Thorpe Neighbourhood Area covers Thorpe Village and land to the north and east of the village, as well as Thorpe Park and St Ann's lake.

Part of Thorpe Park is designated as being within an Area of High Archaeological Potential in the Runnymede Local Plan. This covers the eastern part of the main car park but not the Site which is the subject of this screening request.

There are no scheduled monuments or world heritage sites located within the Site, however the hillfort and 14<sup>th</sup> Century Chapel at St Ann's Hill (to the south) are scheduled monuments. There are also a number of listed buildings which are located to the north-west of the Site, associated with the former Thorpe Park Farm, including:

- Cemex House (Grade II\* listed) north east of the Site beyond Manor Lake;
- Eastley End House (Grade II listed) north east of the Site and adjacent to Cemex House;
- Eastley End Cottage (Grade II listed) further north of both Cemex House and Eastley End House; and
- Fleetmere (Grade II listed) north of the Site on Norlands Lane.



There are also a number of other Grade II and II\* listed buildings further to the north east of the Site within Thorpe Village.

There are no Tree Preservation Orders ('TPOs') within the Site boundary or immediately adjacent to the Site.

A Site location plan is provided at Annex 1 of this letter and an Existing Site Plan is provided at Annex 2.

### 2. Description of the Proposed Development

The Proposed Development comprises a new Rollercoaster in the south-eastern corner of Thorpe Park, rising to c. 72 metres in height. The proposed development was not considered as part of an ES associated with a Medium Term Development Plan for the entirety of Thorpe Park which was conducted in 2009.

Part of the inlet of water will be infilled for the purposes of construction and part or all of this infill is likely to be retained permanently to house footings for the new Coaster.

A Plan is provided in Annex 3 to identify the likely maximum infill required and should be used for the purposes of this screening process.

The Coaster and its associated uses will result in a loss of floorspace. The Loggers Leap ride and its associated buildings, queue line, bridge, the 'Rocky Express' train, Station Building and tunnels are all proposed to be demolished. The total existing floorspace comprises 687 sqm and the total proposed floorspace comprises approximately 416 sqm (including the station building).

Other works included in the Proposed Development are:

- The installation of Coaster columns and track;
- Demolishing the log flume Troph (east of tunnel) and lifting the hill;
- Demolishing the log flume Troph (west of the tunnel) and lifting the hill;
- Making Canyon and Loggers Leap tunnel area safe.

Construction will be undertaken using best practice measures, and a Construction Environmental Management Plan ('CEMP') will be prepared to ensure the implementation of measures to reduce any significant adverse effects during the construction process.

Plans are provided at Annex 4 of this letter identifying those structures to be removed/demolished. A plan is provided at Annex 5 identifying the emerging layout of the Proposed Development and should be used for the purposes of this screening process.

A detailed planning application will be submitted in respect of the Proposed Development.

#### 3. Requirement for EIA

The Proposed Development is one to which the EIA Regulations may apply because it falls within Part 12(d) of Schedule 2 'Tourism and Leisure' which includes Theme Park development where the site is over 0.5 hectares. The Proposed Development can also be considered to fall within Part 13(b) of Schedule 2 which relates to "any change to or extension of development of a description listed in paragraphs 1 to 12 of column 1 of this table, where that development is already authorised, executed or in the process of being executed". The location of the Proposed Development within an existing Theme Park is relevant in this regard.

For Schedule 2 developments, the regulations require that an EIA be undertaken where "the development is likely to have significant effects on the environment by virtue of factors such as its nature, size or location". For developments within Part 13(b), EIA is required if:-



"Either-

- (i) The development as changed or extended may have significant adverse effects on the environment; or
- (ii) in relation to development of a description mentioned in column 1 of this table, the thresholds and criteria in the corresponding part of column 2 of this table applied to the change or extension are met or exceeded."

In determining whether the development is likely to give rise to significant environmental effects, reference should be made to Schedule 3 of the Regulations. This identifies three categories of criteria:-

- 1 Characteristics of the development (such as size, cumulative effects, use of natural resources, production of waste, pollution and nuisances, risk of accidents and risk to human health).
- 2 Location of the development (by reference to the environmental sensitivity of the area).
- 3 Characteristics of the potential impact (having regard in particular to the extent of the impact, its transfrontier nature, magnitude and complexity, probability and duration, frequency and reversibility).

In this case, it should be noted that there are no EU environmental assessments which are relevant to the Proposed Development.

We consider below each of the relevant criteria specified in Schedule 3 of the EIA Regulations in turn below.

### **Development Characteristics:**

The Proposed Development will comprise the erection of a new Coaster reaching a maximum of 72 metres in height. It has been designed within the context of the existing Theme Park and whilst the proposed Coaster will become the tallest element in Thorpe Park, it will effectively 'replace' a previous ride within an existing theme park location and will therefore not change the overall character of the Site or the immediate vicinity. The Proposed Development will not give rise to significant new built floorspace.

The proposed partial infill (whether temporary or permanent) of the lake will result in changes to the water environment and the importation of material from outside of the park.

The development is not considered likely to give rise to the potential for risks from accidents, pollution and nuisances or the significant use of natural resources giving rise to a need for an EIA. During the construction of the Proposed Development good practice measures will be observed.

Due to the established nature of Thorpe Park as a theme park and the effective replacement of one ride with another, the development characteristics are not considered to give rise to any unusual or significant effects either in themselves or in cumulation with other schemes nearby that would give rise to a need for EIA.

#### **Environmentally Sensitive Location:**

The Site is not within a 'sensitive area' as defined by Regulation 2 (1) of the EIA Regulations. A sensitive area is defined as including Sites of Special Scientific Interest (SSSI) and European sites/land subject to nature conservation orders under Section 29 of the Wildlife and Countryside Act 1981 and international conservation sites; National Parks, Area of Outstanding Natural Beauty, World Heritage Sites and Scheduled Ancient Monuments.

The Site is, however, located immediately adjacent to the South West London Waterbodies Ramsar Site; the Thorpe Park No 1 Gravel Pit Site of Special Scientific Interest (SSSI) and the South West London Waterbodies SPA. All of which are 'sensitive areas' as defined by the Regulations. It is considered that the



development would not impact upon the SSSI and/or the Ramsar Site or SPA, given the established use of the Site as a Theme Park and the existing mitigation provided.

The are no known archaeological remains, Scheduled Monuments or Listed Buildings located with the Site boundary and the Site does not lie within a conservation area. There are Listed Buildings within 300m of the Site, however given the context of the existing Theme Park, it is not considered that the development will contribute to their setting.

In the context of the above, the Site itself is not considered to be in an environmentally sensitive or vulnerable location and will not give rise to significant environmental effects requiring assessment in relation to any environmentally sensitive or vulnerable locations.

#### **Environmental Effects:**

Consideration has been given to the characteristics of the potential impacts from the Proposed Development, having regard to the extent of these impacts, their potential trans-frontier nature, magnitude and complexity, probability and duration, frequency and reversibility. Consideration has also been given to whether the impacts could be viewed as unusually complex and potentially hazardous or markedly different in nature. Where mitigation measures are relevant to the Council's consideration of these issues, these have been specified.

#### Landscape and Views

Zone of Theoretical Visibility modelling of the proposed Coaster has been undertaken and sensitive landscape and visual receptors in the surrounding area mapped and reviewed in relation to the ZTV. These are provided in Annex 6. Lichfields revisited the Site and surrounding area in December/January 2020 to understand changes to the wider area since the Medium Term Plan was approved in 2010.

In relation to the Proposed Development, the representative viewpoints previously tested have been reviewed, as has the potential for other views from the surrounding area. This analysis confirmed that the preferred location for the Coaster would be on the eastern side of Thorpe Park, furthest from Thorpe Village.

Visibility would be considerably limited by existing tree cover even in winter which has noticeably increased since the previous landscape and visual assessment work was undertaken. There continues to be no views from St Ann's Hill due to the screening provided by mature vegetation or from the public footpath/ Nature Reserve between Norlands Lane and Green Lane. Views from Holland Gardens, the former Cemex entrance on Norlands Lane, Coldharbour Lane and Ferry Lane would now be screened/largely by intervening mature trees even in winter.

There would be some views of the proposed Coaster from parts of Monks Walk, however, there is extensive screening and there are already glimpsed views of Thorpe Park and the existing disused flume ride which would be replaced, with an opportunity for visual enhancement along this boundary.

Initial visualisations have been prepared understand the potential visual effects of the proposed Coaster. These confirm that the visual effects would be relatively limited and localised. The Coaster would be seen crossing the M3 on Thorpe Road and Staines Road, as well as along the M3. However, in these locations receptors are people in cars moving at speed and are not sensitive to changes in visual amenity.

There would be limited glimpsed views from parts of Thorpe where the Proposed Development would be seen in conjunction with other developments and would be a lower and more distant addition and partly screened by trees in winter. It would be glimpsed through the trees in winter in conjunction with Colossus and Stealth from a limited part of Abbeyfields and from limited stretches of the Thames Path but would be screened in summer. These would not be significant visual effects.



The proposed building, station and queue lines would all be in locations that have already been previously developed as part of the theme park. The column supports would require some trees to be removed but the extent of tree cover screening Thorpe Park would remain.

Given the above, it is therefore considered that the Proposed Development would not give rise to significant environmental effects on the openness of the Green Belt or the surrounding landscape that will give rise to the need for EIA.

#### **Transport**

The Proposed Development will be served via the main access facilities to Thorpe Park. These comprise the roundabout with the A320 Staines Road and Mixnams Lane. Staff and servicing vehicles will continue to be accessed by staff and servicing vehicles via the A320 Staines Road priority junction north of the main Site access roundabout. The proposals will not result in a significant increase in the number of service vehicles.

Thorpe Park's Theme Park Admissions' data indicates that visitor numbers have remained significantly below the peak that occurred around 2010. Additionally, it also demonstrates that visitor numbers fluctuate and that without investment in new rides visitor numbers would likely decline. It is therefore not anticipated that the introduction of a new Coaster will give rise to a demonstrable transport impact and evidence from other theme parks suggests that the introduction of new rides of this nature to an existing park does not meet the significance threshold for EIA.

Further, the Proposed Development does not include for the provision of any additional car or coach parking, effectively restricting the potential for growth in the vehicular trip attractiveness of the Site.

Given the lack of change to the primary use of the Site, the accessibility of the Site and the existing transport infrastructure, it is considered that the proposals will not have significant environmental impacts on transport which will give rise to the need for EIA.

#### **Hydrology and Flooding**

As specified above, the Site is located within Flood Zones 2 and 3. The proposed temporary and permanent works (including lake infill, Coaster columns, Coaster track, supporting buildings) will introduce new development into the floodplain of the River Thames and the Chertsey Bourne.

If unmitigated this could result in a significant adverse effect on flood risk both to the park and to neighbouring areas and may also affect the performance of the proposed River Thames Flood Relief Scheme which is currently planned to pass through Fleet Lake and Abbey Lake.

Thorpe Park has previously agreed with the Environment Agency a floodplain compensation bank (approved as part of the MTDP) which can be used to mitigate/offset any loss in floodplain storage volume arising from development at the park. It is currently assumed that this can be used for this development and preapplication consultation with the Environment Agency is planned to confirm this. If use of the bank is not permitted, separate compensation will need to be provided to ensure flood risk effects are fully mitigated. Assuming floodplain compensation can be agreed with the EA the Proposed Development is not expected to have a permanent significant adverse effect on flood risk.

The development may introduce new impermeable surfaces during both construction and operation which if unmitigated could increase surface water runoff rates and volumes and surface water flood risk. Given the location, effects are not anticipated to be significant and furthermore will be mitigated through the use of sustainable drainage systems in accordance with planning policy requirements.



Details of these and any other relevant flood risk mitigation measures will be fully documented in the Flood Risk Assessment (FRA) accompanying the planning application. Runnymede Council's proforma for sustainable drainage strategies and SUDs will also be completed.

#### **Noise and Vibration**

The proposed Coaster is located within a Site that has a long-established use, where noise generated is not dissimilar to other rides located within Thorpe Park. The primary sources of noise from the Proposed Development are expected to be from the interaction between the Coaster car and the rails, guest noise and attraction audio tracks.

A preliminary assessment has been undertaken relating to operational noise from the ride itself, considering the closest off site receivers to the proposed attraction and representative background noise levels. The assessment concluded that the sound power levels, from the proposed Coaster, should not exceed the limit of 115 dB L.

During construction, there will be some noise impacts, however these would all be short term, intermittent effects that would be mitigated by site controls and best practice measures which will be outlined in a construction management plan submitted with the planning application.

Further noise assessments will be undertaken and a detailed noise assessment will be issued to support the planning application for the development.

Given the above, it is considered that there are unlikely to be any significant effects arising in relation to noise which will give rise to the need for EIA.

#### **Ecology**

Ecological assessments for the proposed Coaster began in January 2021 and will continue through the winter of 2021-2022. The Proposed Development Site is generally of low ecological interest, with few protected species issues. It consists of an existing attraction and coniferous plantation, with limited areas of lakeside willow woodland, and a small gravel pit bay. There are, however, some notable mature broadleaved trees along the Monks Walk footpath boundary.

Targeted survey work took place over Summer 2021 for birds and bats. This has indicated the presence of common species within and around the Site. Of greater importance is the presence of statutory and non-statutory designated conservation sites immediately adjacent to Thorpe Park. These include Thorpe Park No. 1 Gravel Pit SSSI, and the South West London Waterbodies SPA and Ramsar sites – designated principally for their wintering bird interest. Targeted winter bird survey work, and a desk study to access Wetland Bird Survey information, will be undertaken in the coming months to allow any potential impacts on these designated sites to be fully assessed.

Due to the location of the Proposed Development within the existing theme park area, the low value of the habitats present, and the lack of significant protected species issues, it is not considered that the scheme would give rise to a need for EIA.

An ecological appraisal, including an impact assessment and mitigation recommendations for protected species, will be submitted as part of the planning application. Habitat mitigation will be embedded within the landscaping proposals for the scheme. This will allow ecological issues to be appropriately considered as part of the planning decision. To ensure that the Council can fully discharge its duties in relation to the internationally-designated sites, a shadow Habitats Regulations Assessment will be provided alongside the ecological appraisal.



#### **Air Quality**

The Site is not located within an Air Quality Management Area, as stated above.

The construction works have the potential to create dust that could be considered on occasional, short-term impact. During construction it will therefore be necessary to apply a package of mitigation measures to minimise dust emission. With these measures in place it is expected that any residual effects will be insignificant in relation to air quality.

The Proposed Development is not intended to vastly increase visitor capacity at Thorpe Park, but to upgrade the existing attractions. Therefore, it is not considered that there will be any significantly adverse impacts on air quality generated by the operation of the new facilities. Therefore, in relation to air quality, the Proposed Development is not likely to give rise to the need for EIA.

#### **Above and Below Ground Heritage**

The Site does not contain any listed or locally listed buildings and is not within a Conservation Area. There are no listed buildings within the immediate vicinity of the Site and there are no conservation areas adjoining the Site. The listed buildings located to the north east of the Site are separated by both Manor Lake and St Ann's lake.

The part of Thorpe Park where the proposed Coaster is to be located is not within an Archaeological Priority Area and there are no known remains of potential interest within the Site boundary.

Based on information available to the team at this time and given this part of the Site was previously occupied by a ride, it is not considered that there is potential for significant effects in relation to above or below ground heritage which would give rise to a need for EIA.

### **Planning Submission**

Notwithstanding your consideration of the requirement for EIA in connection with the Proposed Development, additional material will accompany the application for planning permission to assist in your consideration of the proposals. The material will comprise:-

- 1 Application forms, certificates and appropriate application fee;
- 2 Plans, Elevations and Sections;
- 3 Design and Access Statement;
- 4 Planning Statement;
- 5 Flood Risk Assessment and Drainage Survey;
- 6 Statement of Community Involvement;
- 7 Transport Statement;
- 8 Arboricultural Survey;
- 9 Ecology Appraisal and Habitats Regulations Assessment;
- 10 Noise Impact Assessment; and
- 11 Landscape and Visual Impact Assessment.



#### Conclusion

This screening request has been prepared in respect of the Proposed Development at Thorpe Park in Chertsey, Surrey. It has been demonstrated that the proposals are unlikely to give rise to significant environmental effects requiring an EIA.

We trust that you have sufficient information to determine whether this is an EIA development under the Town and County Planning (Environmental Impact Assessment) Regulations 2017 (as updated).

From these Regulations, we note that the local authority has three weeks (beginning from the date of receipt) to form a screening opinion and to provide the main reasons for this opinion having regard to the relevant criteria listed in Schedule 3. If adopting a negative screening opinion, we note that the LPA must also state any features of the Proposed Development and measures envisaged to avoid and prevent what might have otherwise been, significant adverse effects on the environment.

Please contact or me if you have any questions.

Yours faithfully

Senior Planner

Copy Merlin Attractions Operations Ltd



## **Annex 1: Site Location Plan**





## **Annex 2: Existing Site Plan**



All heights, sizes and dimensions should be checked on site by the contractor before any work is put in hand.

Figured dimensions should be taken in preference to scaling and any errors or omissions reported to the architect at once.

This drawing has been prepared in accordance with the CDM (Construction Design and Management) and all foreseeable design risks to those involved or affected by construction have been avoided wherever possible.

#### Key:

Application Boundary

Existing Building

Rev Date By Detail

Drawing status

Client

Merlin Magic Making Project/Location

Thorpe Park Staines Road Chertsey Surrey KT16 8PN





Site Plan as Existing

26.11.21 Scale(s)

As indicated @A1 Drawing number

TP24-SA-XX-XX-DR-A-0102



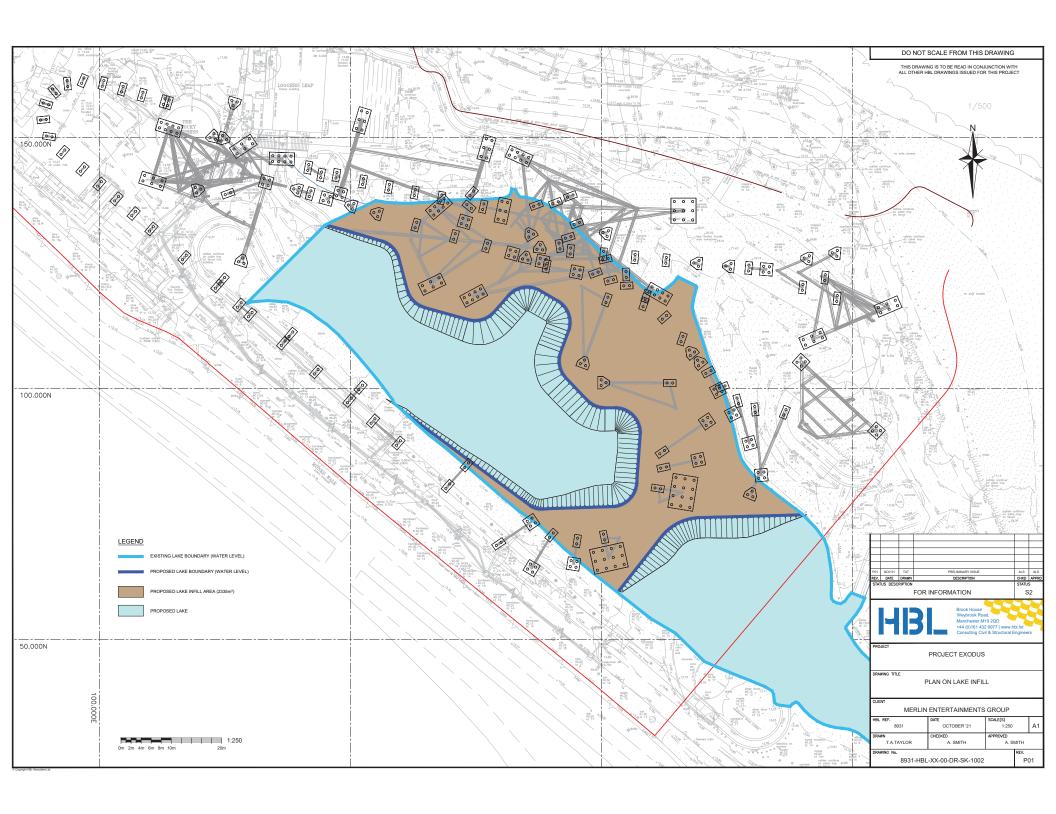
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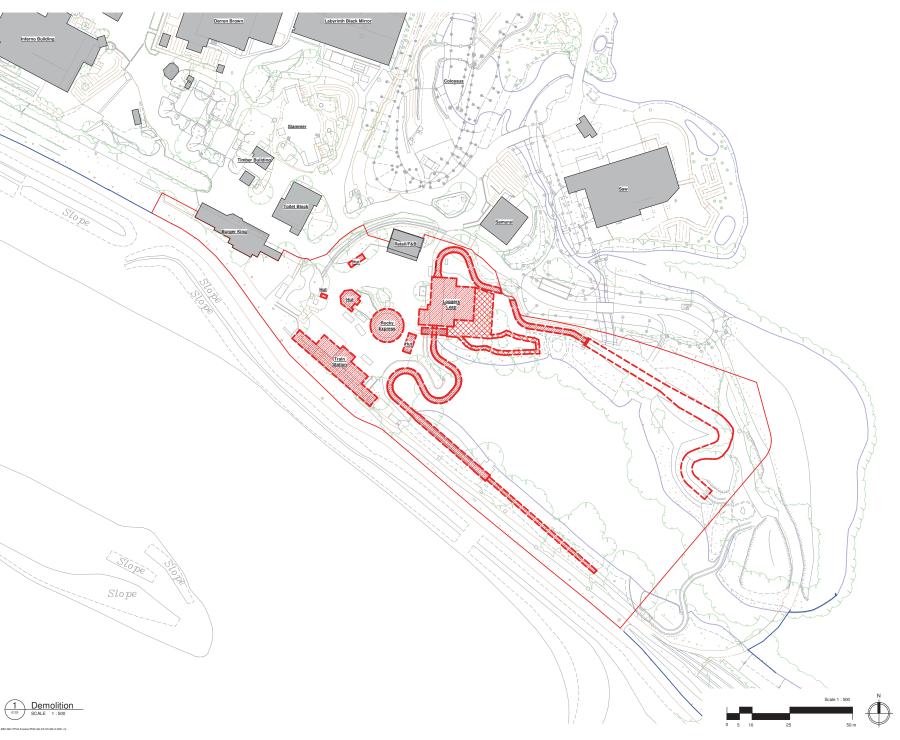


# Annex 3: Plan identifying maximum area of lake infill (during construction)





# Annex 4: Plans identifying floorspace and structured to be demolished



All heights, sizes and dimensions should be checked on site by the contractor before any work is put in hand.

Figured dimensions should be taken in preference to scaling and any errors or omissions reported to the architect at once.

This drawing has been prepared in accordance with the CDM (Construction Design and Management) and all foreseeable design risks to those involved or affected by construction have been avoided wherever possible.

#### Key:

Application Boundary

Buildings/Structures to be demolished

Existing Building

Rev Date By Detail

Drawing status

S3

Client

Merlin Magic Making Project/Location

Thorpe Park Staines Road Chertsey Surrey KT16 8PN





Drawing title

#### Demolition Drawing

Date	Drawn	Checked	Job No.
26.11.21	AD	TM	3198
Scale(s)			

As indicated @A1 Drawing number

TP24-SA-XX-XX-DR-A-0103



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## **Annex 5: Proposed Site Plan**



All heights, sizes and dimensions should be checked on site by the contractor before any work is put in hand.

Figured dimensions should be taken in preference to scaling and any errors or omissions reported to the architect at once.

This drawing has been prepared in accordance with the CDM (Construction Design and Management) and all foreseeable design risks to those involved or affected by construction have been avoided wherever possible.

#### Key:

Application Boundary

Demolished Building/Structure

Existing Building

Proposed Building

Proposed Surfacing

Rev Date By Detail

Drawing status

S3

Client Merlin Magic Making

Project/Location

Thorpe Park Staines Road Chertsey Surrey KT16 8PN





Site Plan as Proposed

26.11.21 Scale(s)

As indicated @A1 Drawing number

TP24-SA-XX-XX-DR-A-0104



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# **Annex 6: Plan identifying Zone of Theoretical Visibility**