

Project Exodus Planning Statement

Thorpe Park Resort

Merlin Attractions Operations Limited

March 2022

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1.0 Introduction

1.1 This Planning Statement has been prepared by Lichfields on behalf of Thorpe Park Resort, a company forming part of Merlin Attractions Operations Limited (Merlin), to accompany a full planning application for a new rollercoaster 'Project Exodus' at Thorpe Park Resort. The description of development is:

“The redevelopment of the Old Town area at Thorpe Park Resort, including demolition of existing buildings and structures, and installation of a rollercoaster along with associated buildings and structures, ground works infrastructure and infilling of part of lake and landscaping.”

1.2 The development site extends to 1.8 ha in the south eastern corner of the Resort. The site currently comprises the Old Town part of the Resort which includes several rides, a food and beverage unit and the structures/buildings of now closed rides, including Loggers Leap.

1.3 The purpose of this Planning Statement is to assess the proposed development against relevant policies in the statutory development plan, having regard to other material planning considerations and the relevant statutory tests. It draws upon and should be read in conjunction with other design and technical documents accompanying this application, comprising:

- 1 Design and Access Statement, (Smytheman Architectural);
- 2 Statement of Community Involvement, (Lichfields);
- 3 Architectural Drawings (Smytheman Architectural);
- 4 Landscape Drawings (NWB Architects);
- 5 Heritage Impact Assessment (Lichfields);
- 6 Landscape Visual Impact Assessment (Lichfields);
- 7 Economic Benefits Assessment (Lichfields);
- 8 Ecological Impact Assessment (Baker Consultants);
- 9 Noise Impact Assessment (Cahill Design Consultants);
- 10 Transport Assessment (Transport Planning Associates);
- 11 Arboricultural Impact Assessment (Keen Consultants);
- 12 Flood Risk Assessment (Atkins); and
- 13 Drainage Statement (HBL Associates).

1.4 A full list of drawings forming part of the planning application is appended to the cover letter.

2.0 Background

- 2.1 This sections provides an introduction to Thorpe Park Resort, explaining the challenges it has faced as a result of the Covid-19 pandemic. It also provides an overview of the recent history to development at the Resort and a description of the site and its surroundings.

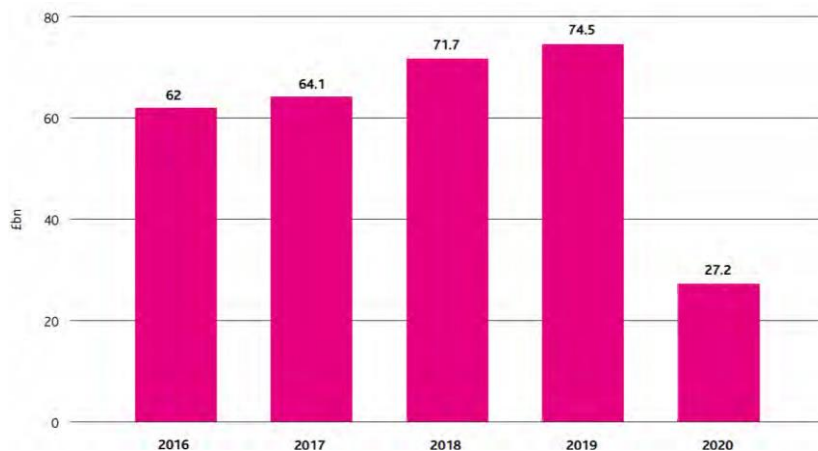
Thorpe Park Resort

- 2.2 Thorpe Park Resort covers an area of approximately 109 hectares (ha), to the south east of Thorpe Village and north of Chertsey in Surrey. The core area of the Resort where the rides and attractions are located comprises approximately 27ha. The Resort opened in 1979. Following its acquisition by Tussauds (now Merlin) in 1998 there has been investment to enhance and upgrade its attractions to improve visitor experience.
- 2.3 The Resort has maintained its position as a high profile leisure facility in Runnymede and the wider south east region. Thorpe Park Resort contains over 30 rides and leisure attractions including THE SWARM, the UK's only winged rollercoaster; SAW – The Ride providing a 100ft vertical drop; and Tidal Wave, one of the UK's wettest water rides. Alongside the rides, the Resort includes various food and beverage options as well as 90 bedrooms located in the Shark hotel.

COVID-19 Impact

- 2.4 The leisure and tourism industry has been one of the hardest hit sectors by COVID-19. The industry relies on the movement and mixing of people, two of the factors most likely to spread the virus, and as such has been heavily affected by the necessary restrictions put in place to control the pandemic.
- 2.5 The Government published The Tourism Recovery Plan ("TRP") in June 2021. It explains that COVID-19 struck at one of the worst possible times, just as the peak UK summer season in 2020 was about to start, and that widespread fears across the sector of "three winters" worth of business at the start of the pandemic were not unfounded. The TRP states that leisure and tourism direct gross value added is estimated by Oxford Economics to have fallen by 64% between 2019 and 2020, from £75 billion to £27.2 billion and overall the fall in tourism's economic output over 2020 is estimated to have led to a 1.5% fall in UK GDP (Figure 2.1). COVID-19 has in many senses reset the baseline, providing the leisure and tourism sector with a far greater set of challenges than could have been forecast before the pandemic struck.

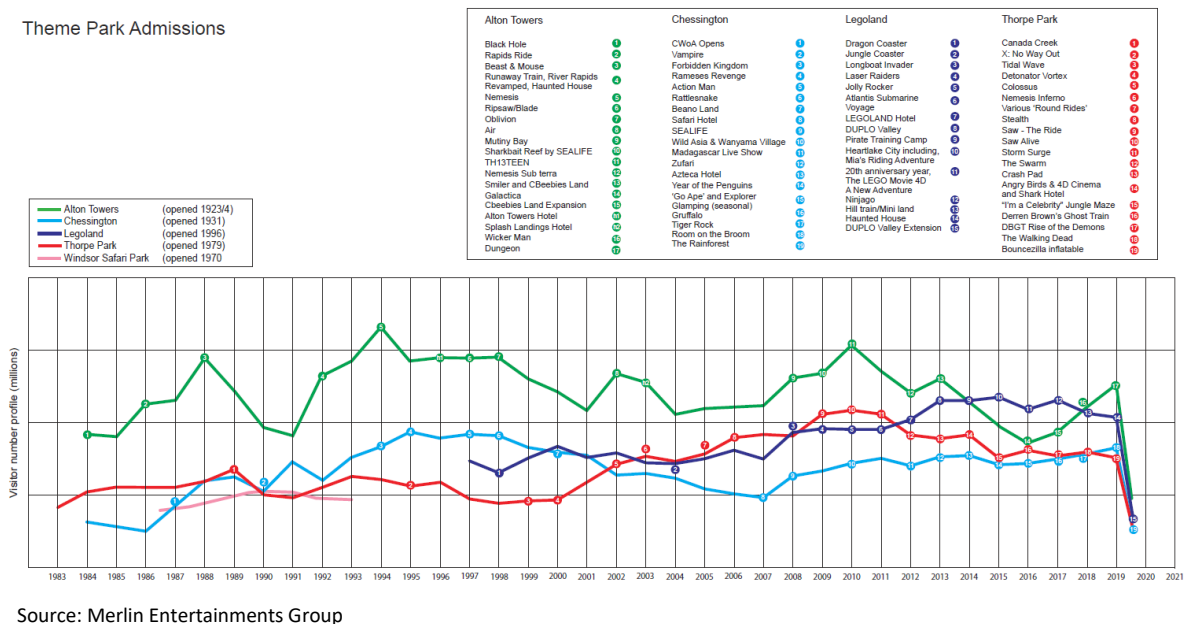
Figure 2.1 Tourism-direct Gross Value Added in £bn (2016 to 2020)



Source: Oxford Economics forecasts, published alongside the Tourism Recovery Plan

- 2.6 Oxford Economics through its work published alongside (and reported within) the TRP has predicted that the tourism sector as a whole will not recover to 2019 levels until 2025. The TRP notes that:
- “...this is not quick enough for a sector that can offer so much and the government is determined to bring that forward. Furthermore, the UK government’s ambition is not to simply return to the way things were in 2019. As the sector rebuilds from COVID-19, now is the time to ensure it is reaching its full potential and to tackle the structural barriers holding it back, so that the sector can seize the opportunities to become a more sustainable, more innovative, more inclusive, more productive and more resilient industry.”*
- 2.7 A key objective of the Government’s recovery plan is to “*build back better.*” The TRP explains that this will involve engaging existing and new audiences to, “*...enhance the visitor experience and provide an offer that continues to meet consumer expectations.*” (TRP, Objective 3, page 17).
- 2.8 Prior to the COVID-19 pandemic, emphasis was placed on refreshing the theme park experience to maintain its position in the face of increased competition from other leisure attractions. The impact of COVID-19 on Thorpe Park Resort has been significant with the Resort forced to close to the public for 96 days in 2020 and 17 days in 2021, and when open has had to operate at a reduced and capped capacity for extended periods which limited the number of people that Merlin could welcome to the Resort. The rapid decline in 2020 visitors is shown in Figure 2.2.
- 2.9 Figure 2.2 shows the historic pattern of growth in relation to ride openings and that periods of lower investment often result in difficult trading periods. In relation to Thorpe Park Resort, there has been a gradual decline in visitor numbers since 2011 with the last rollercoaster, THE SWARM, delivered in 2012. It is clear that investment in the improvement and enhancement of rides and attractions is critical to support continued growth and will need to form an essential role in the Resorts recovery from the pandemic to maintain their position in the market.
- 2.10 Thorpe Park Resort operates within a highly competitive leisure and tourism market. During the steady recovery from COVID-19 the Resort must be quick to respond to investment and recovery opportunities in the face of increased competition, particularly with the opening of the London Resort scheduled for 2024.

Figure 2.2 Merlin theme park admissions and new ride openings



Source: Merlin Entertainments Group

Medium Term Development Plan

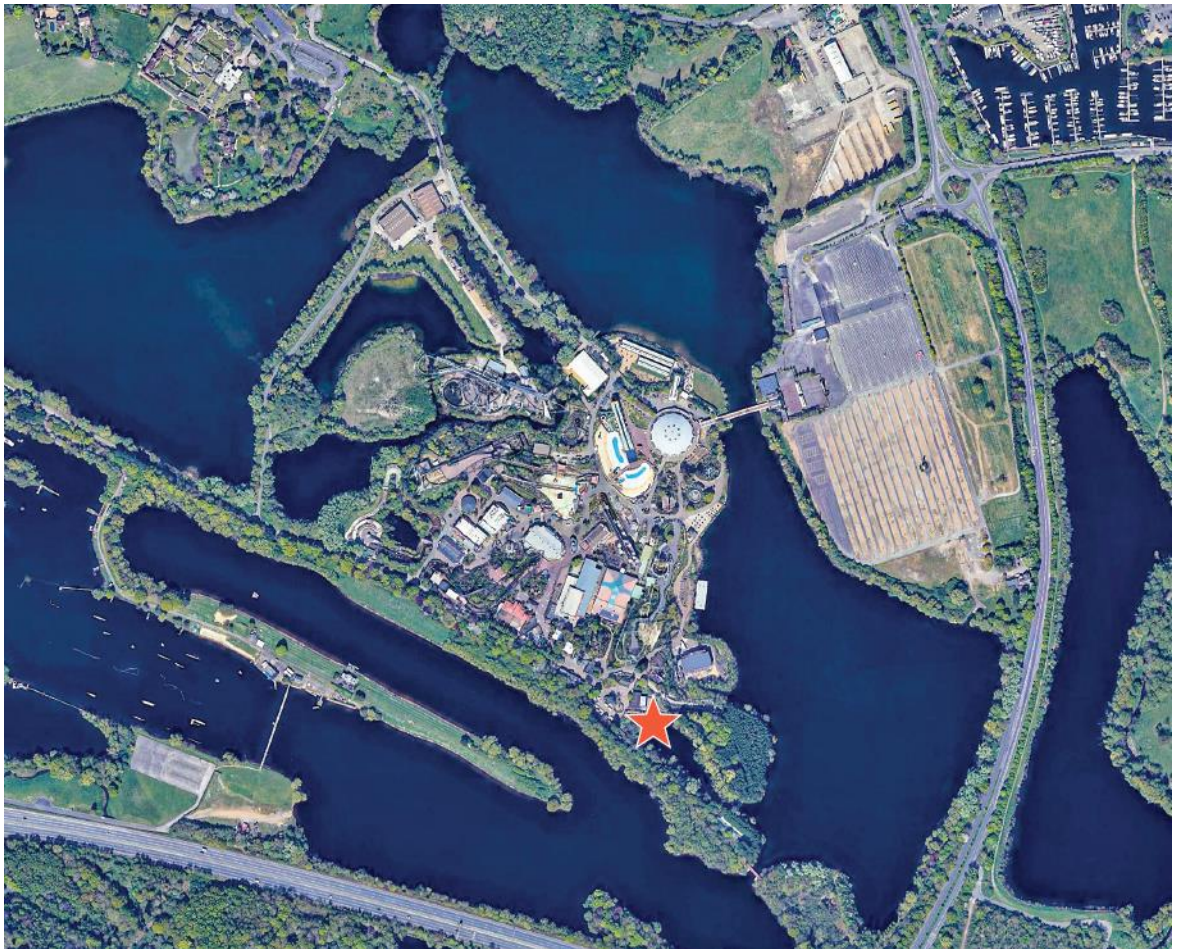
- 2.11 Thorpe Park Resort has an extensive planning history with planning permission for its use as a Leisure Activity Centre granted in 1986 (ref. RU.83/0514). Historically, a series of Medium Term Development Plans have been prepared to form comprehensive plans for the future of the site given its then status as a 'Major Developed Site' in the Green Belt and to meet the site specific local plan planning policy requirement for the Resort. This site specific policy was deleted as part of the most recent policy review with the Council preferring to rely on Green Belt policy generally and the sites status as Previously Developed Land.
- 2.12 The most recent Thorpe Park Medium Term Development Plan (MTDP) covered the period of 2010-2016 with outline planning permission granted in 2011 (ref: RU.10/0579). This approved:
- A new floorspace 'bank' of 5,000 sqm of floorspace, which has facilitated improvements to the food and drink offer at the Resort and the installation of Derren Brown's Ghost Train which opened in 2016.
 - Five new round rides.
 - Two major rollercoasters, of which one has been delivered with the opening of THE SWARM in 2012.
 - Creation of two new islands and extension of land elsewhere within the core of the Resort.
 - Floodplain compensation scheme in the form of the creation of new flood compensation areas.
- 2.13 In addition, the MTDP expanded the well-established pink zone – the core development area within the Resort - which is the focus of new development activity and theme park attractions and facilities. It also reconfirmed the extent of the yellow 'servicing' zone (generally containing support facilities to the Resort) and the blue 'quiet' zone (an open area that acts in part as a buffer between the theme park and surrounding area).

- 2.14 The MTDP provides important context and should be considered a material consideration in the determination of applications moving forward.

3.0 Application site and surroundings

- 3.1 The application site comprises 1.8 ha of land and a small inlet of Abbey Lake located to the south east of the core of the Resort (see Figure 3.1). The site currently comprises the 'Old Town' part of the Resort which includes rides such as Timber Tug, Rocky Express, and Lumber Jump with the Old Town Grill providing food and drink provision. The buildings/structures of previous rides that have since closed remain on site and comprise 687 sq.m of existing floorspace and ride infrastructure including the former Loggers Leap ride (closed 2015) and the Canada Creek Railway (closed 2011). Due to the current ride offer in The Old Town and the extent of closed rides the area is underused and creates a good opportunity for redevelopment.

Figure 3.1 Aerial photo of Thorpe Park Resort showing location of Project Exodus



Source: Lichfields

- 3.2 The small inlet of Abbey Lake covers an area of approximately 5,418sqm and extends to the east and north of the site. To the north beyond the application boundary is SAW- The Ride and Samurai which form part of the main developed core of the Resort as shown on the 'existing site plan' (ref. TP24-SA-XX-XX-DR-A-0102). To the east and south, the site is screened by dense trees and vegetation which are clustered around Abbey Lake. The trees surrounding the site are generally self-seeding and of a low quality.
- 3.3 Monks Walk, an existing public right of way, which connects Chertsey to Thorpe, runs along the southwestern boundary of the site behind the tree line beyond which is St Ann's Lake which includes Thorpe Lakes, a water sports attraction.

3.4

Access to the site will be via the theme park main entrance with visitors arriving by car and public transport using the existing car parking, taxi drop off and bus station facilities.

Figure 3.2 Views of the Old Town part of the Resort, including redundant parts Loggers Leap log flume



Source: Lichfields 2021/2022

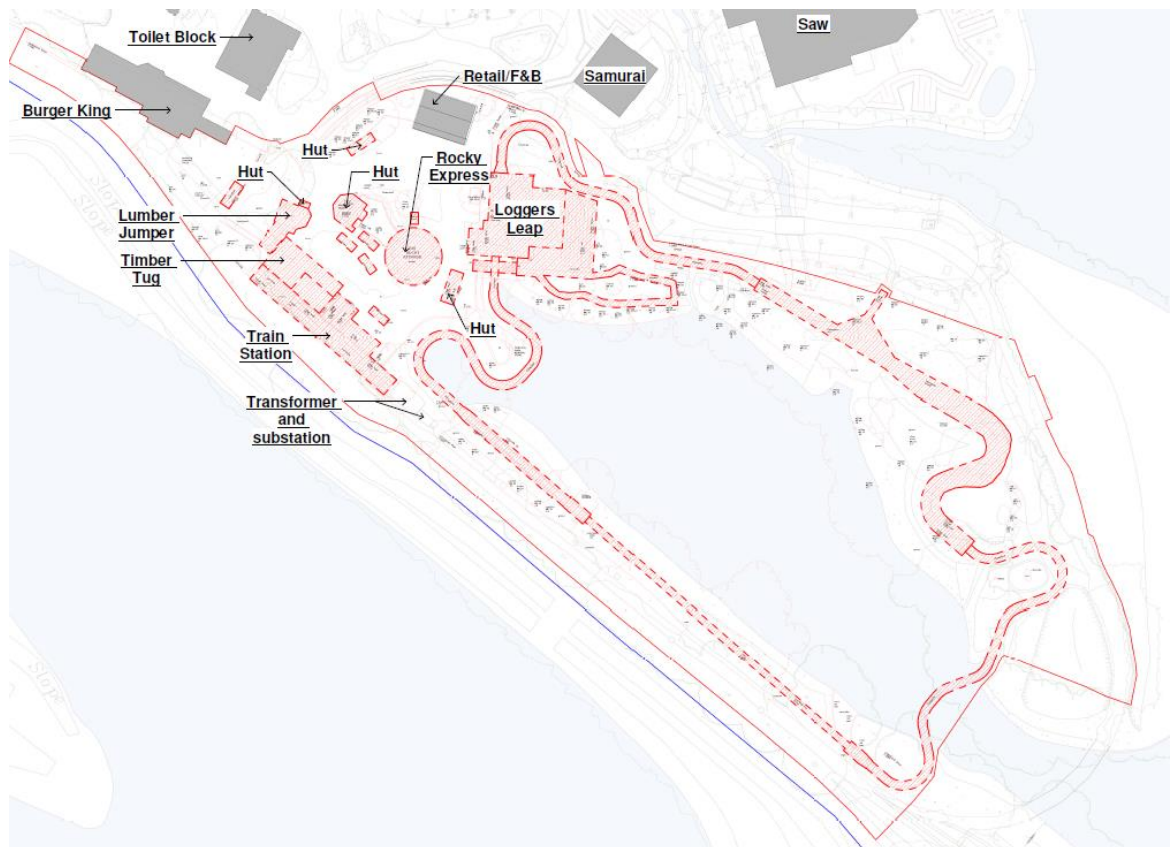
4.0 Proposed Development

- 4.1 The application comprises the redevelopment of The Old Town part of the Resort to deliver a new rollercoaster and ancillary buildings in addition to new landscaping. This application seeks permission for:

“The redevelopment of the Old Town area at Thorpe Park Resort, including demolition of existing buildings and structures, and installation of a rollercoaster along with associated buildings and structures, ground works infrastructure and infilling of part of lake and landscaping.”

- 4.2 The redevelopment will refresh the ride offer in this part of the Resort and will deliver Thorpe Park Resort’s first rollercoaster since THE SWARM in 2012. The redevelopment will involve the removal of existing rides in operation, namely Lumber Jump, Rocky Express and Timber Tug Boat, as well as Old Town Grill and other theming features. The buildings and structures of Loggers Leap and Canada Creek Railway, both of which have been closed for some time, will also be removed as shown in figure 4.1. The remainder of the section describes the proposal in more detail.

Figure 4.1 Extract of demolition plan showing existing buildings and structures outlined in red



Source: Demolition plan, Smytheman Architectural

- 4.3 The scheme has been subject to pre-application engagement with RBC officers, other statutory consultees and members of the public. The public consultation included in-person presentations at Thorpe Park Resort and online live presentations in December 2021. Overall 1,787 responses were received of which 97% support the proposed new ride. Details of the pre-application

consultation can be found in the accompanying Statement of Community involvement prepared by Lichfields.

4.4

A detailed description of the proposed works is provided in the Design and Access Statement including proposed materials. In summary, the proposed development comprises the following and is shown on the proposed site plan (drawing reference TP24-SA-XX-XX-DR-A-0104):

- 1 **Rollercoaster:** Installation of a new rollercoaster comprising a steel track partly positioned over water with a maximum height of 72m. The height will vary throughout the ride with other sections of ride looping at 43m and 50m in height. The track will be supported by c. 143 steel supporting columns.
- 2 **Ride Station building:** Located on the western part of the site will provide 180sq.m of floorspace (GIA) and will be 16.9m in length, 2.8m wide and 9.4m in height. The station provides access to the ride for guests and the track runs through the building at the south east and north west elevations.
- 3 **Maintenance building:** Positioned in the north west corner of the site. The building will create 254 sq.m of floorspace (GIA), will be 34.6m in length by 4.85m wide and 7.6m in height and will be raised above ground on stilts for flood mitigation purposes.
- 4 **Photo shop:** located in the northern section of the site within the main plaza. The proposed photo shop (GIA 34 sq.m) will be 8m in length, 5m wide and 4.4m in height.
- 5 **Queue line and plaza:** A plaza will signify arrival at the new ride and will be located to the south of the food and drink unit and photo shop. A queue line, comprising a timber fence, will lead from the plaza to the station building with a food and drink unit also provided measuring 7.6 sq.m (GIA). Disabled access to the rollercoaster will be provided via a dedicated accessible queue line and a platform lift will be installed at the station.
- 6 **Lake Infill:** Approximately 2,335 sq.m of the Abbey Lake inlet will be temporarily infilled to facilitate the construction of the rollercoaster. Much of this will then be excavated on completion of construction to reinstate the lake edge and include new reed beds with a total area of 4,761sqm (a net reduction of 657sqm from the existing lake inlet). The extent of the infilling required for construction can be seen on drawing Ref. 8931-HBL-XX-XX-DR-C-1000 (appended to the Flood Risk Assessment) and the final lake size following completion of the development is shown on drawing reference 472-105-5.
- 7 **Landscaping and trees:** Tree removal is proposed to facilitate the proposed development. The majority of trees to be removed are self-seeded trees and of low quality and low ecological value (see drawing 1769-KC-XX-YTREE-TCP01Revo). Extensive mitigation is proposed as part of the proposed development, including reed beds around the edge of the lake. The landscape scheme (Drawing ref 472-105-5) will also include the creation of new woodland (2,712sqm), individual tree planting, scrubland, wildflower meadow planting and grassland. The extensive landscaping proposed will enhance the appearance of the lake and the biodiversity value of the site generally.

4.5

Table 4.1 provides a summary of the proposed building floorspace and heights described above.

Table 4.1 Proposed building floorspace and heights

New Structure	Gross Internal Area (sqm)	Height (m)
Ride Station Building	180sqm	9.2m
Maintenance Building	254sqm	7.4m
Food and Beverage Unit	7.6 sqm	3.8m
Photo Shop Building	34 sqm	4.4m

- 4.6 Visitors will access the new ride via the existing theme park entrance and through the existing path network within the Resort. No new access arrangements to the site are proposed and no additional car parking is required.

Diana Memorial

- 4.7 After the death of Princess Diana in 1997 Thorpe Park Resort added a memorial to her, in the viewing area of Loggers Leap. It is a stone memorial with a metal plaque that bears the following dedication:

“Diana, Princess of Wales

Dedicated in fond memory by the Thorpe Park Team

September, 1997”

- 4.8 The memorial is important to Thorpe Park Resort and its employees, as such Merlin has taken the opportunity to revitalise and enhance The Diana Memorial within a new, improved location, in the Sunken Gardens to the north of Stealth.



Source: Thorpe Park Resort

5.0 Relevant Planning Policy and Guidance

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004, states that if regard is to be had to the development plan for the purpose of any determination to be made under the Planning Acts the determination must be in accordance with the plans unless material considerations indicate otherwise.
- 5.2 This section identifies key planning policy and guidance at a national and local level of relevance to the proposed development.

Statutory Development Plan

- 5.3 The statutory development plan for the site comprises the Runnymede 2030 Local Plan (LP) (adopted July 2020) and the Thorpe Neighbourhood Plan (adopted June 2021).
- 5.4 The development plan policy designations which directly affect the development site are:
- 1 Green Belt (LP SD1, EE17)
 - 2 Flood Zone 2 & 3 (LP EE13)
 - 3 Sites of Nature Conservation Importance – Abbey Lake (LP EE9)
 - 4 Biodiversity Opportunity Area (LP EE11)
- 5.5 Additional development plan policy designations which affect the immediate surroundings of the development site are:
- 1 Special Protection Area – Manor Lake (LP EE9 and EE10)
 - 2 Site of Specific Scientific Interest and Ramsar – St Ann’s Lake (LP EE9)
- 5.6 Thorpe Park Conservation Area is located approximately 1.2k north west of the site in Thorpe village which also includes part of the former Thorpe Park Farm. There are a number of grade II and II* listed properties within the village and within Thorpe Park itself Manorhouse Farm house, Manorhouse Barn and The Shire Barn are listed.
- 5.7 The following policies are also considered in our assessment of the application.
- EE1 Townscape and Landscape Quality
 - EE2 Environmental Protection
 - EE4 Listed Buildings
 - EE5 Conservation Areas
 - EE9 Biodiversity, Geodiversity and Nature Conservation
 - EE11 Green Infrastructure
 - EE12 Blue Infrastructure
 - EE13 Managing Flood Risk
 - EE17 Infilling or Redevelopment on Previously Developed Land in the Green Belt
 - IE4 The Visitor Economy
 - SD1 Spatial Development Strategy
 - SD3 Active and Sustainable Travel
 - SD4 Highway Design Considerations
 - SD7 Sustainable Design

- Neighbourhood Plan Policy TH5 Green and Blue Infrastructure

Material considerations

5.8

This section identifies the material considerations pertinent to the determination of this application. These include national planning policy guidance and Supplementary Planning Documents/Guidance (SPD/SPG) as follows:

- National Planning Policy Framework (NPPF, 2021): Sets out national planning policy and how it is expected to be applied. At the heart of the NPPF is a presumption in favour of sustainable development.
- Runnymede Design Supplementary Planning Document (adopted June 2021).
- Runnymede Green and Blue Infrastructure Supplementary Planning Document (adopted November 2021).

6.0 Planning Assessment

6.1 In accordance with Section 38(b) of the Planning and Compulsory Purchase Act (2004), this section considers the acceptability of the proposed development against the statutory development plan and other material considerations.

6.2 Based upon the relevant policy and guidance identified in Section 5.0 of this report, the key issues for consideration are:

- 1 Principle of development
- 2 Economic benefits
- 3 Design and landscape
- 4 Heritage
- 5 Flooding and drainage
- 6 Noise
- 7 Ecology
- 8 Trees
- 9 Transport
- 10 Sustainability
- 11 Contamination
- 12 Green Belt

Principle of development

6.3 Planning policy at the national and local level supports the growth of the tourism and leisure sector and has provided specific support to this industry to aid its recovery from the COVID-19 pandemic. The NPPF encourages the creation of conditions in which businesses can invest, expand and adapt (paragraph 81). In particular, in supporting a prosperous rural economy, planning decisions should enable sustainable rural leisure developments which respect the character of the countryside (paragraph 84). This is reiterated by LP Policy IE4 which states that planning applications that deliver a high quality visitor experience that increases the contribution that tourism makes to social and cultural wellbeing and economic growth will be supported, subject to complying with the NPPF sequential test and preserving the Borough's special heritage and natural environment. Indeed, the promotion and enhancement of tourist and leisure attractions that are sustainable is recognised as important to the future prosperity of the Borough (supporting text paragraph 8.26).

6.4 The proposed new development will refresh, renew and revitalise an underused part of the core of the Resort thus enhancing the visitor experience at the Resort. The proposals will enable this prominent local attraction to maintain and increase its contribution to the local economy in line with LP Policy IE4. We expand on this further in the economic benefit section and consider the potential impact on the Borough's heritage and natural environment at paragraphs 6.25 and 6.37, concluding respectively that the proposed development will be acceptable in these regards. Similarly we provide an assessment against Green Belt policy in paragraph 6.53.

6.5 Tourism and leisure development is a 'main town centre use' as defined in the NPPF. Accordingly, in line with NPPF paragraph 87 and LP Policy IE4 a sequential approach should be followed whereby main town centre uses should be located in town centres, then in edge of centre locations; and only if suitable sites are not available should out of centre sites be

considered. National Planning Policy Guidance (NPPG) distinguishes that the sequential test should recognise that certain main town centre uses have particular market and locational requirements which mean that they may only be accommodated in specific locations (Paragraph: 012 Reference ID: 2b-012-20190722).

- 6.6 In this case, the very nature of the development as a rollercoaster necessitates a location within the theme park. Accordingly, the proposal is intrinsically linked to Thorpe Park Resort itself and the need it is providing for cannot be met by provision of the ride and associated facilities in a separate location away from the Resort. The site is located within the established developed core of the site and is therefore a sequentially preferable location within the Resort and consequently, the proposed development complies with the sequential test in line with the NPPF, NPPG and LP Policy IE4.
- 6.7 Overall, the principle of new investment at Thorpe Park Resort is strongly supported by the NPPF and local policy.

Economic benefits

- 6.8 The NPPF (Chapter 6) states that planning policies and decisions should help create the conditions in which businesses can invest, expand, and adapt. National policy also places significant weight on the need to support economic growth and productivity. The importance of the tourism sector is promoted in the Runnymede Local Plan (Policy IE4: The Visitor Economy) which supports applications that deliver a high quality visitor experience that increases the contribution that tourism makes to economic growth and encourages the renewal of visitor facilities in appropriate locations. Similarly this significance was recognised in the Tourism Recovery Plan published by Government as referenced at paragraph 2.5.
- 6.9 The proposed rollercoaster forms a crucial element of the Resort's post-COVID-19 recovery. Investment in the renewal and enhancement of rides and attractions is paramount if the Resort is to sustain interest and remain competitive in the leisure and tourism market. Project Exodus will deliver the first new rollercoaster at Thorpe Park Resort since THE SWARM in 2012 and is a fundamental part of the Resort's ongoing investment to increase visitor numbers back to pre-COVID-19 levels.
- 6.10 The economic benefits arising from the proposed development can be summarised as follows and are presented in the infographic in Appendix 1 (alongside an infographic presenting all economic benefits from the Resort):
- 1 **Job creation:** Thorpe Park Resort is one of the largest private sector employers in Runnymede. A total of 31 full time and 123 part time seasonal jobs will be created by the proposed development. Overall, 185 permanent jobs will be supported by Thorpe Park Resort and 853 seasonal jobs along with 265 jobs created indirectly by visitor spending in shops, hotels and restaurants in the local area. A further 89 jobs will be created during the construction stage of the development.
 - 2 **Operational expenditure:** The annual wage bill supporting the operations at Thorpe Park Resort amounts to £13.7m and the proposed development would lead to £560,000 wage spending in the region. Based on the share of workers employed at the Resort who live locally it is estimated that around 60% of the annual wage expenditure is retained in households within the local area, which can be assumed to be equivalent to a £8.22m injection of local income. Moreover, the total expenditure on the supply of goods and services to Thorpe Park Resort amounts to around £20.9m annually. The capital expenditure generated by the Resort equates to around £2.1m per year. In addition, approximately £1m in business rates is paid each year which in turn is recycled back into the local community in the form of Council spending on services and infrastructure. Overall

the indirect and induced expenditure from the proposed development is estimated as £5.1m each year, with Thorpe Park Resort as a whole generating £17.5m.

3 Visitor expenditure:

- a As a result of the proposed development, the Resort will continue to make a substantial contribution to the local economy not only directly, but also indirectly through attracting large numbers of visitors to Runnymede. Due to the popularity of Thorpe Park Resort, it attracts tourists to the area which results in additional spending in the immediate locality and further afield. Indeed, approximately 25% of visitors stay overnight in hotels/guesthouses or with friends/family when they visit Thorpe Park Resort.
- b These visitors can have a strong positive impact on the local visitor economy by increasing spending levels for other tourist attractions and businesses, such as hotels, restaurants, shops etc. For example, the offsite expenditure of overnight visitors is estimated to be £187,000 from the proposed development and £13.6m from the Resort annually. Offsite expenditure of day visitors is estimated to be £48,000 annually arising from the proposed development and £3.4m from the Resort.

6.11 The proposed development is expected to generate 185,000 additional visitors compared to the 2021 baseline position; however the 2021 park performance was impacted by the pandemic and prior to this visitor numbers had fallen since the 2010 peak (as set out at paragraph 2.9). In this context the visitor numbers generated from the development will contribute to the recovery of visitor numbers at the Resort but will remain below the peak that occurred in 2010 and well below those assessed for the Medium Term Development Plan.

6.12 Overall, the economic benefits of the proposal are substantial and weigh heavily in favour of the development, in accordance with NPPF guidance (Paragraphs 8 and 81) and LP Policy IE4.

Design and landscape

6.13 Paragraph 130 of the NPPF requires development to function well, add to the overall quality of the area and have a good layout. Furthermore LP Policy EE1 requires all development to achieve high quality and include design that responds to the local context. Thorpe Neighbourhood Plan Policy TH5 is not relevant to Thorpe Park Resort which sits outside the character areas referred to in the policy.

6.14 The design approach has been set out in the accompanying Design and Access Statement prepared by Smytheman Architectural. Overall, the proposed design of the new ride is of a high quality and appropriate to the theme park context.

6.15 The layout of the ride and buildings is well integrated with existing features such as the lake inlet and boundary trees with the buildings positioned to retain the higher quality trees. The redevelopment of the Old Town area will enhance the currently underused and time-worn part of the Resort and replace this with a high quality new attraction.

6.16 In terms of the proposed height, the buildings and much of the rollercoaster track will sit below the existing tree belt and therefore will be screened from external views. Where the track will extend above the tree line, it is proposed to be finished in a lighter colour to seek to blend in with the sky and reduce its visibility. This is a successful approach to design that was agreed with officers for the Stealth rollercoaster which in many weather conditions blends well into the background. The careful choice of a lighter colour for the upper element of the ride will assist in ensuring that the attraction contributes to the improved environment within the theme park, whilst also ensuring it complements the wider local context beyond the Resort boundaries in line with Policy EE1.

- 6.17 The ride will benefit from a bespoke theming concept which will draw on the presence of the lake and surrounding trees. The theming and colour scheme for the attraction will be determined at the detailed design stage and can be controlled by way of a planning condition.
- 6.18 In addition, in line with the aspirations of LP Policy SD7, access for all is integral to the proposed design, and as such an accessible route to the proposed rollercoaster is presented on the proposed drawings.
- 6.19 The proposed development will include a comprehensive landscaping scheme. In line with the Green and Blue Infrastructure SPD, the proposed landscaping scheme has been informed by an analysis of the existing site including biodiversity and tree surveys and seeks to embed green and blue infrastructure within the scheme. It comprises:
- 1 Substantial new tree and scrub planting.
 - 2 Wildflower meadow planting beneath the track and around the columns.
 - 3 New reed beds around the lake edge and beneath the track where it crosses the lake.
 - 4 Climbers to the ride building elevation and queue line to soften its appearance.
 - 5 The maintenance building will be largely screened by new tree planting.
- 6.20 The proposed landscaping will soften the appearance of the new ride and buildings against the backdrop of the existing tree line when seen from within the Resort; will contribute to the overall greening of the site thus enhancing the quality of the landscape setting; and will maintain the tree line screening from beyond the Resort boundaries. It is proposed that a detailed landscaping scheme is secured prior to commencement of above ground works. In line with the design principles in the SPD, this will enhance the natural environment in this part of the Park and allow the development to contribute to the multi-functional network of green and blue infrastructure at Thorpe Park Resort.
- 6.21 The proposed development therefore complies with the NPPF, LP Policy EE1 and the Green and Blue Infrastructure SPD.

Visual effects

- 6.22 A Landscape and Visual Impact Assessment analyses the effect of the ride from several local viewpoints. A review of each is also provided in the Green Belt assessment (paragraph 6.53).
- 6.23 Overall, Thorpe Park Resort sits discretely within its landscape setting and the proposed development will be largely screened by existing vegetation, limiting its public visibility from outside of the Resort. Where the proposed rollercoaster will be visible in glimpsed views, the structure will be seen within the context of existing theme park development and other rollercoasters in the main developed core of the Resort. The careful and considerate selection of a lighter colour for the upper tracks will help to minimise visual impact by allowing the ride to blend into the background.
- 6.24 The character of existing views will therefore be maintained and the visual amenity of neighbouring properties will not be adversely affected in accordance with LP Policy EE1.

Heritage

- 6.25 The NPPF requires local authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal and take account of the desirability of sustaining and enhancing the significance of heritage assets. Similarly, LP Policy EE4 attaches considerable weight to the protection of the setting of listed buildings and Policy EE5 requires development affecting the setting of the Conservation Area should protect, conserve and

wherever possible enhance the special interest, character and appearance of the Conservation Area.

- 6.26 The Heritage Impact Assessment concludes that the proposal will preserve the setting and significance of the Conservation Areas due to existing rides present in views and substantial existing screening of views in accordance with Policy EE5. Moreover, with respect to Cemex House, existing tall rides sit within the setting of this listed building and the proposed development will therefore be a characteristic change which will preserve the setting and its significance. This is also the case in relation to the Grade II* Laleham Abbey and Grade II Abbey Mews and nil effects are identified on the Grade II listed Fleetmere. Accordingly, the proposed development complies with Policy EE4 and the NPPF.

Flooding and drainage

- 6.27 In compliance with the NPPF and LP Policy EE13, a Flood Risk Assessment (FRA) accompanies this application.
- 6.28 The FRA concludes that there is no tidal flood risk, very low risk of surface water flooding and low risk of sewer, reservoir, and groundwater flooding. The site is at risk of fluvial flooding and accordingly mitigation measures have been incorporated into the design. The finished floor levels of proposed buildings have been designed to be above the design water level of 1% (1 in 100) ARP with 35% climate change allowance. Where this has not been possible for the food and beverage unit and photo opportunity hut, flood resilience measures will be incorporated into the design. In addition new fencing will be open in design so not to impede flood flows and an appropriate drainage strategy is proposed so not to adversely impact surface water runoff.
- 6.29 The existing floodplain compensation bank at Thorpe Park Resort (provided as part of the Medium Term Development Plan) forms part of the mitigation package to balance out potential flood risk impacts. Sufficient space remains within the compensation bank to accommodate the proposed development (see Appendix B of the FRA). It is proposed that an updated version of the compensation table is secured by pre-occupation condition following detailed design. Thorpe Park Resort also has an existing Flood Response Plan and the proposed new attraction will be managed under the agreed plan. Accordingly, subject to the mitigation measures the proposed development will not increase flood risk to people or property elsewhere and is considered acceptable in flood risk terms as required by the NPPF and Policy EE13.
- 6.30 In line with NPPF paragraph 162, a flood risk sequential test is provided at Section 2.4 of the FRA confirming that the proposed development is acceptable in this respect. An exception test is not required for 'less vulnerable' or 'water compatible' development within Flood Zone 2 and 3, and theme park uses are considered 'less vulnerable' and the columns are 'water compatible'. Moreover, at a later stage, post planning, a Flood Risk Activity Permit will be required which will include necessary information to ensure that the development is acceptable from a water quality perspective.
- 6.31 The lake inlet within the site is identified on the Council policies map as forming part of the River Thames Scheme safeguarded land. As part of the pre-application engagement, discussions have taken place with the Environment Agency (EA) and it has been confirmed by the EA that this area does not form part of emerging proposals for the River Thames Scheme. The proposed development is therefore compatible with the River Thames Flood Relief Scheme.
- 6.32 A Drainage Strategy has been prepared in line with LP Policy EE13. The proposed development will incorporate Sustainable Urban Drainage Systems (SUDS) in the form of permeable paving and attenuation with surface water infiltrated at source and discharged into Abbey Lake. Notably, the total area of impermeable surface will be reduced as a result of the proposal. Please

see Appendix 4 of the Drainage Strategy report for a copy of the proposed drainage scheme. There is no requirement for new foul water connections as part of the development.

- 6.33 The proposed development includes amendments to the size and shape of the lake inlet with the final design shown on drawing reference 472-105-5. In line with LP Policy EE12, which encourages applicants to contribute towards the delivery of a high quality multi-functional blue infrastructure network, the proposed development will enhance the inlet environment through improved biodiversity and landscape measures. The existing inlet is an artificial environment with Thorpe Park Resort and its surrounding environs created by flooding the previous gravel pit in the 1970s. Accordingly, this development will not lead to the loss of a natural bank which Policy EE12 resists.

Amenity

- 6.34 The NPPF (paragraph 185) and LP Policy EE2 require that new developments mitigate and minimise potential noise impacts. Thorpe Park Resort has carefully considered the location of the proposed rollercoaster to seek to minimise impacts on its neighbours and therefore proposes to position this in the south-east corner of the core of the Resort, away from its closest residential neighbours to the north and west.
- 6.35 In accordance with LP Policy EE2, a Noise Assessment concludes that the proposed development will be acceptable in noise terms. It considers the impact from both the operational and construction stage of the project on several noise sensitive receptors, which are the closest residential properties to the north on Norlands Lane and at Cemex House, east on Penton Park, south on Staines Lane and west on Coldharbour Lane. With respect to the operational stage:
- Noise levels equal to the existing background noise levels are set as the 'Lowest Observed Adverse Effect Level'.
 - These noise levels are not expected to be reached and so in accordance with Policy EE2 mitigation measures to reduce noise impacts are not required.
 - It is recommended that the PA system is limited so that noise levels can be easily controlled to external receivers.
 - Regarding the construction stage, given the distance to the nearby sensitive receptors and the relatively high noise from road traffic, no adverse impacts are predicted from construction activities or construction traffic.
- 6.36 Therefore, the proposed development will accord with Paragraph 185 of the NPPF, LP Policy EE2 and will not adversely impact residential amenity in terms of noise.
- 6.37 As part of the pre-application advice response, officers requested that potential overshadowing on residential amenity of nearby properties is considered. It is noted that the tall sections of the rollercoaster will be steel track and so a porous structure that will let sunlight through. As a result of this design characteristic, in combination with the separation distances between the nearest residential properties (with the closest over 500m away), it is not considered that there will be overshadowing impact on existing residential properties. Accordingly the development will comply with LP Policy EE1 which requires that proposals ensure there is no adverse impact on the amenities of neighbouring properties.

Ecology

- 6.38 The NPPF states that development should contribute to and enhance the natural and local environment, protecting and enhancing value landscapes and sites of biodiversity value and minimising impacts on and providing net gains for biodiversity (paragraph 174). LP Policy EE9

also seeks to secure a biodiversity net gain and requires development to follow the hierarchy of mitigation. Moreover, the site is within the locally designated Biodiversity Opportunity Area where Policy EE11 encourages proposals to restore, maintain and enhance habitat connectivity. The Green and Blue Infrastructure SPD provides further guidance to support nature recovery and reverse the decline in biodiversity.

- 6.39 Thorpe Park Resort sits within a sensitive ecological context due to the Thorpe Park No. 1 Gravel Pit Site of Special Scientific Interest (SSSI), the South West London Waterbodies Special Protection Area and South West London Waterbodies Site to the south and the Abbey Lake Site of Nature Conservation Importance (SNCI) to the east. These designations are identified for supporting wintering bird populations.
- 6.40 An Ecological Impact Assessment has considered the ‘mitigation hierarchy’ – to avoid, reduce, compensate and enhance the potential adverse impacts of the proposed scheme. The application site itself is of low nature conservation interest, with the report noting that the development is proposed in the developed core of the Resort, which does not support any habitats of significant conservation interest, albeit the lake inlet falls within the SNCI designation. Given the low ecological value of the existing site and the introduction of significant new planting and greening in and around the edges of the application site, no significant impacts on habitats are anticipated. With respect to designated sites, the report concludes that there could be a very short term temporary impact on the SSSI during construction stage due to works taking place in the winter months. Proposed works to the lake inlet could also impact the SNCI however it is noted that the transformation of the area to reedbed and wet grassland habitat on completion of the development will provide a greater diversity of wetland habitat post development.
- 6.41 The assessment also considers the potential impact on protected species, namely bats, amphibians and birds as set out in Table 6.1.

Table 6.1 Recommended mitigation measures for protected species

Species	Recommended mitigation and enhancement
Bats	Trees identified as having bat roof potential will be retained and protected during construction and Monks Walk, which has been identified as suitable for commuting and foraging bats, will not be adversely affected by the development.
Amphibians and reptiles	General mitigation options include: <ul style="list-style-type: none"> • Creating corridors or ‘stepping stones’ of habitat to join up populations. • Restoring or creating breeding and terrestrial habitats. • Planning the timing of the work to avoid sensitive times of year. • Moving the animals to another area of suitable habitat during works.
Birds	To reduce potential impacts, the scheme includes new reedbeds to provide valuable habitat. Any site clearance should take place outside of the main nesting season and should be limited to September-February period. Bird boxes can be provided to enhance breeding bird habitat.

Source: Ecological Impact Assessment, Bakers Consultants

- 6.42 The proposed enhancement measures will lead to a biodiversity net gain of 10 %. In line with Policy EE9, the proposed ecological enhancements and the biodiversity net gain are considered to present benefits that clearly outweighs any adverse impact identified, indeed the proposed net biodiversity gain exceeds current policy requirements. Accordingly, the proposed redevelopment aligns with guidance set out in the NPPF and LP Policy EE9 and will support nature and biodiversity in line with the Green and Blue Infrastructure SPD.

Trees

- 6.43 LP Policy EE9 requires development to pay particular attention to trees considered to make a significant contribution to their surroundings individually or as a group.
- 6.44 There are no Tree Preservation Orders on site and the Tree Survey and Impact Assessment notes that the majority of trees on site were planted at the time the Resort was laid out and are of a low quality. In line with the Green and Blue Infrastructure SPD, the scheme layout has been designed to seek to retain all significant trees, including those recognised as older and larger along Monks Walk, with necessary removal of lower quality trees to facilitate the development. The total tree removal is shown on the Tree Protection Plan and will be replaced with 5,757 sqm of biodiverse indigenous woodland and scrub planting; an increase of 45% in terms of the area covered (as shown on drawing reference 472-105-5). A tree protection plan has been prepared to show proposed protective measure for retained trees during construction (identified on ref 1796-KC-XX-YTREE-TCP01 Rev.O).
- 6.45 The assessment also notes the enhancement of the site's green infrastructure provisions through the addition of new trees and planting. The additional trees will contribute to the enhancement of sustainable drainage system, biodiversity, and local climatic regulation once the trees have matured. In light of the contribution to the site's green infrastructure network particularly in the form of tree planting, the development accords with LP Policy E11 and the principles of the Green and Blue Infrastructure SPD.

Transport

- 6.46 Resort admissions have remained below the peak that occurred in 2010. Visitor numbers are currently in the gradual process of recovery post COVID-19 restrictions. LP Policy SD4 encourages development proposals to *"maintain or enhance the efficient and safe operation of the highway network."* Paragraph 111 of the NPPF supports development proposals that do not have an unacceptable impact on highway safety.
- 6.47 The Transport Statement concludes that the proposed development is acceptable in highways terms. In short, the assessment identifies that the proposed development is not considered to lead to a significant uplift in visitor trips to the site in the context of the Covid recovery. The current visitor numbers are well below those assessed for the Medium Term Development Plan which were concluded to have no material impact on the highways network. In this context, the proposed development is concluded to similarly have no material impact on the highways network demonstrating compliance with the NPPF and LP Policy SD4. This has been agreed in principle with Surrey County Council. Furthermore, the Resort benefits from extensive car, cycle and coach parking and given the position above no further parking provision is considered necessary.
- 6.48 LP Policy SD3 requires development proposals that generate significant traffic movement to submit and implement Travel Plans demonstrating how active and sustainable travel options have been considered. As this development will not generate significant traffic movements a Travel Plan is not necessary. Notwithstanding, Thorpe Park Resort has an existing Travel Plan in place which is appended to the Transport Statement. It is anticipated that a Travel Plan will be secured through a Section 106 agreement for the Resort.

Sustainability

- 6.49 The NPPF (paragraph 11) outlines a presumption in favour of sustainable development and encourages the use of renewable and local carbon energy (paragraph 155). At the local level, LP

Policy SD7 encourages sustainable design with sustainable construction and demolition techniques promoted, including the reuse and recycling of materials.

6.50 Thorpe Park Resort is committed to running the Resort in the most sustainable way possible. The information presented above in this Statement demonstrates a high consistency with sustainability objectives, delivering economic, social and environmental benefits in line with the NPPF. Furthermore, Merlin is committed to monitoring and reviewing their activities, including at Thorpe Park Resort, to identify opportunities to contribute to carbon reduction. In this respect, Thorpe Park Resort and its partners are exploring options for onsite generation of renewable energy. The ride itself will include state of the art energy efficient technologies and features such as LED lighting to reduce its energy consumption.

6.51 In relation to demolition and construction, Thorpe Park Resort will:

- Seek to maximise the amount of recyclable material in line with the waste hierarchy.
- Explore opportunities for the reuse of the rides to be removed either elsewhere in the Resort or at other Merlin attractions.
- Test the on-site ground conditions to seek to reuse excavated material for lake infill where possible in line with the waste hierarchy, and in turn potentially reducing vehicle movements associated with construction by reducing material brought onto site.
- Look to reuse site demolition waste as aggregate for haul roads.

6.52 Overall, waste materials will be reused on and off-site or on other sites where possible.

Contamination

6.53 RBC Policy EE2 requires development proposals to investigate the nature and risk of contamination on land which is suspected of being affected by current land contamination. In accordance with Policy EE2, a Phase 1: Preliminary Risk Assessment identifies potential contamination pathways and receptors with appropriate further site investigation measures recommended to be secured by planning condition.

Green Belt

6.54 The site is located within the Green Belt as is the whole of the Thorpe Park Resort and was identified in previous Local Plans as a 'Major Developed Site' in the Green Belt. Major Developed Sites are no longer referred to in policy. The NPPF explains that the construction of new buildings within the Green Belt should be regarded as inappropriate, unless it falls within the exceptions listed (paragraph 149). The exceptions include limited infilling or the partial or complete redevelopment of previously developed land that would not have a greater impact on the openness of the Green Belt than existing development. This is reiterated by LP Policy EE17.

6.55 The NPPF defines previously developed land as "*Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure...*" The proposed development site is an area characterised by existing rides, structures and hardstanding within the core of the theme park. It is clearly previously developed land. The application site is within the established 'pink zone' for activity and development at Thorpe Park Resort, as approved under the Medium Term Development Plan (MTDP, planning permission ref. RU.10/0579) and defined in the legal agreement dated 18 November 2004 (pursuant to the 2004-2010 MTDP). The MTDP through approving the Pink Zone established the principle of development for rides and attractions and associated buildings within this part

of the Green Belt. Accordingly, the proposed development is considered to present the redevelopment of previously developed land within the Green Belt.

6.56 As explained in policy, the redevelopment of previously developed land is acceptable where it would have no greater impact on the openness of the Green Belt than the existing development. Clearly the references to 'limited infilling' and redevelopment' allows new development as any 'infill' by definition would fill in openness within the Green Belt. The test is therefore not focused on the mere presence of additional development but the impact that this has. LP Policy EE17 sets out considerations that will be taken into account in assessing the impact of openness. We consider each in turn below.

- 1 **Lawful status of existing buildings and hardstanding:** The lawful use of Thorpe Park as an amusement park is long established, dating back to the original planning permission for Thorpe Park granted in 1986. The in-use and decommissioned rides and attractions and associated buildings have been on site for many years and are lawful, many of which are subject to individual planning permissions.
- 2 **Existing and proposed building floorspace and building footprint:** Paragraph 3.1 and Table 4.1 set out the existing and proposed floorspace respectively. It is clear that the proposed development will lead to a net reduction in building floorspace on site. Whilst not measurable as footprint as such, there will be a modest increase in the ride coverage compared to the former loggers leap ride, although this remains within the developed core of the park.

The proposed development will therefore not lead to a greater impact on openness than the existing situation. The Abbey Lake inlet within the application site will be reduced by 12% on completion of the development, however landscaping in the form of wildflower meadow planting and new reed beds will be provided at the boundary. The setting of the lake will therefore remain unchanged (i.e. bounded by rides and landscaping) and effectively remains 'open' with no greater impact on the openness of the Green Belt, due to the landscaping enhancements.

- 3 **Existing and proposed hardstanding:** The western part of the site is characterised by structures/buildings on hardstanding. This will remain the case for the proposed development with an overall reduction in developed area of 29% compared to existing. Ultimately the existing site comprises a developed area of hardstanding and buildings/structures adjacent to a lake and this character will remain unchanged by the proposed development.
- 4 **Phasing of development:** Demolition of the existing rides/structures necessary to carry out the development will have to take place prior to new construction. The construction will be undertaken as one phase. There will therefore not be a scenario where existing and proposed structures are in place at the same time.

6.57 The other considerations set out in Policy EE17 are the general height of development and disposition around the site; the development envelope and amount of undeveloped area; and relationship with existing landscape features and integration with surroundings. Given the interrelationship of these matters we consider these together.

6.58 The application site sits within the envelope of Thorpe Park Resort within the developed core of the site (the pink zone). The character of this part of the Green Belt is unusual for a Green Belt site in that its character is a developed theme park including a range of rides and attractions and their ancillary buildings and support facilities. To the east of the site is also a large surfaced car park. The lakes surrounding the core of the park are another dominant feature, with boundary trees and landscaping around the Resorts boundaries (see Figure 6 below). The existing pattern and grain of this part of the Green Belt is therefore of rides, structures and

buildings set within a landscape setting with lakes and woodland screening at the boundaries of the theme park. The application site is developed and part of this established pattern and grain. The proposed development is in essence a redevelopment and will remain entirely characteristic of this part of the Green Belt.

Figure 6.1 Plan of alternative sites considered (see Appendix 2 for full version)



Source: Smytheman Architectural

6.59

With respect to height, existing rides vary in height across the theme park envelope reflecting the disposition of rides which vary in height in order to provide the thrill of high and low points accompanied by twists and turns in the ride tracks. The tallest ride at the Resort is currently Stealth which measures approximately 62m in height. The maximum height of the proposed rollercoaster will measure 72m at its highest point, but similar to other rides at the theme park, the majority of the ride will fluctuate. The next highest point of the proposed ride is 50m and other lower peaks of 48m and 43m respectively, complementing the height of other existing rides. Accordingly, the majority of the ride will be within the height envelope of the Resort and importantly will appear as instances of height rather than a mass of development. Significantly, a review of the representative public views from outside the Resort show that due to direction and distance from the application site, the proposed ride will predominantly appear within the developed envelope of the Resort. Table 6.2 provides an assessment of each view. An existing and proposed version of each viewpoint is provided at Appendix 4 of the Landscape and Visual Impact Assessment.

Table 6.2 Assessment of views

Viewpoint	Assessment
Viewpoint 1: Staines Road	The viewpoint is to the south east of the site. This is a representative public view taken from the bridge over the motorway. The view benefits from the dense screening of existing woodland with glimpses of Stealth visible between trees. The majority of the proposed rollercoaster would be well screened by the trees, including the tallest loop. Lower parts of the rollercoaster could be visible but would appear similar to Stealth as glimpsed views through the trees.
Viewpoint 2: Thorpe Road	The viewpoint is west of the application site and is in the built environment context of the M3 motorway which informs any appreciation of this view. The view is characterised by instances of theme park development seen in a landscaped setting with the motorway in the foreground. The character of this view remains unchanged by the proposed development with the rollercoaster presenting a further instance of plant and machinery where glimpses of SAW – The Ride currently exist. The height of the rollercoaster will appear similar to Stealth positioned at the northern end of the view.
Viewpoint 3: Thorpe Cemetery	The viewpoint is to the north-west of the application site. The existing view is of the theme park in a landscaped setting with instances of plant and machinery glimpsed between and above the treeline. The character of the view will remain unchanged. Due to location and perspective, the proposed rollercoaster will appear adjacent to and lower than Stealth, with the majority of the rollercoaster screened by existing woodland. Where visible it will appear as a typical feature (of this unique site) with sensitive colour finishes will blend into the existing skyline.
Viewpoint 4: Coldharbour Lane	The viewpoint is to the north-west of the application site, slightly closer than viewpoint 3. Similar to viewpoint 3, views of the proposed rollercoaster would be seen alongside and lower than Stealth with the light colour finish to the taller parts of the rollercoaster helping it visually recede. The character of the view will therefore remain unchanged.
Viewpoint 5: Holland Gardens	The viewpoint is positioned to the north of the site and no views of the theme park currently exist with no change to the view as a result of the development.
Viewpoint 6: Abbeyfields, Chertsey	The viewpoint is south-east of the application site providing a more distanced view of Viewpoint 1. The theme park is well screened by trees and development in the existing view with Stealth just perceptible when zoomed in. The proposed rollercoaster would have a similar effect with a very low change to the view in winter and would be fully screened in summer.
Viewpoint 7: The Thames nr Riverfield Road	The viewpoint is north of the application site and the existing view is of the river in the foreground with the theme park in the distance with Stealth and Swarm glimpsed between trees and built development in the foreground. The proposed rollercoaster would be screened by the trees and built development so would not be visible from this viewpoint.
View 8: Ferry Lane	View looking west/south-west from Ferry Lane. Filtered views of the top of the new rollercoaster would be glimpsed through the occasional gaps in the trees and hedgerow from November to April. It would be screened by the trees and hedgerow along Ferry Lane in summer. It would be seen in combination with views of Stealth and other structures that are glimpsed along Ferry Lane in winter.

- 6.60 Drawing the above together, the proposed development is entirely characteristic of this ‘uncharacteristic’ part of the Green Belt. The pattern and grain of the application site will still be of rides with associated buildings on hardstanding with the lake/landscape setting. All trees on the Resorts boundary will be retained. The amount of development in floorspace terms will be reduced compared to the existing situation on site, thus quantitatively reducing the impact on openness. Whilst the proposed ride track itself will increase the extent of development within this part of the site – an increase in development is a likely consequence of any redevelopment/infill proposals - this will not materially change the character of the core of the Resort. In terms of the visual impact on openness, where publicly visible, Thorpe Park Resort will continue to be viewed as rides and attractions (in particular rollercoasters) set within a landscaped setting with the proposed rollercoaster forming part of the existing envelope of development at Thorpe Park Resort. There will be an increase in height of the highest ride at the site, but the proposed rollercoaster will have an open construction and where there will be views, as demonstrated above, they are not considered to undermine nor have a greater impact on the openness of the Green Belt in this location.
- 6.61 No other harm is considered to arise from the proposed development as set out in the previous sections of this Planning Statement. Accordingly, the proposed development meets the requirements of the NPPF and LP Policy EE17 and can be regarded as an exception to inappropriate development in the Green Belt, as redevelopment/infill development.

Alternative Very Special Circumstances Case

- 6.62 Without prejudice to the position above, should the Council consider that the development does not comprise an exception to inappropriate development, there are very special circumstances that would outweigh any harm considered to arise from the development.
- 6.63 NPPF paragraph 147 explains that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances. Substantial weight is to be given to any harm to the Green Belt and very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm from the proposal, is clearly outweighed by other considerations. This is reiterated in the supporting text within the Local Plan, but not repeated in Local Plan policy.

Establishing potential Green Belt harm

- 6.64 Should the Council consider the proposed development harms the openness of the Green Belt and the proposal is therefore inappropriate development in the Green Belt, the harm arising should be afforded substantial weight.
- 6.65 We have reviewed the proposals against the five purposes of the Green Belt (NPPF paragraph 138) and conclude there is no conflict for the following reasons.
- 1 To check the unrestricted sprawl of large built-up areas: The proposed development makes no material contribution to the sprawl of large built up areas. The majority of the site is in an area of existing hard standing currently occupied by rides and structures associated with the theme park.
 - 2 To prevent neighbouring towns merging into one another: Thorpe Park Resort is an island of development set apart from neighbouring towns and villages. This purpose is therefore not relevant.
 - 3 To assist in safeguarding the countryside from encroachment: The core development area of Thorpe Park is surrounded on all sides by lakes, with the exception of the car park which is between Abbey Lake and Staines Road. The proposed development will not extend built

development beyond the existing boundary of the theme park. Accordingly, no conflict is considered to arise with this purpose of the Green Belt.

- 4 To preserve the setting and special character of historic towns: The application site is not close to a historic town. Thorpe village contains a designated Conservation Area which Thorpe Park is considered to fall within the setting of. As concluded in the Heritage Statement, the setting and significance of the Conservation Area would be preserved. No harm therefore arises.
- 5 To assist in urban regeneration, by encouraging the recycling of derelict and other urban land: This purpose is not relevant to the proposed theme park development as the site is within an existing theme park and not a regeneration area or derelict land.

6.66 In summary, the proposed development does not conflict with these five purposes.

‘Any other harm’

6.67 The “any other harm resulting from the proposal” referred to in paragraph 148 of the NPPF means ‘any other harm’ and is not restricted to Green Belt harm (see Redhill Aerodrome Ltd v Secretary of State for Communities and Local Government 2014).

6.68 It is therefore necessary to consider if any other harm arises from the proposed development. An assessment of ‘other harm’ is provided in the technical assessments and as explained at paragraph 6.60 no harm arises.

Very Special Circumstances

6.69 Very special circumstances exist for the proposed development that outweigh the harm to the Green Belt should this be identified by officers. These relate to:

- The need for the development
- A lack of alternative sites; and
- That other ‘special’ reasons exist, namely the benefits arising from the proposal.

6.70 We set out the position in relation to each of these below.

Need for the development

6.71 The new rollercoaster is needed to help achieve the investment needed to

- 1 revise/refresh visitor numbers;
- 2 improve the visitor experience;
- 3 recover from Covid-19; and,
- 4 respond to increasing competition in the leisure industry.

6.72 Themes parks see a natural ebb and flow of visitor numbers leading to a need for continual refresh and renew of rides and attractions to maintain visitor numbers. As shown at Figure 2.2, Thorpe Park Resort has seen a decline in visitor numbers since 2010 following a period of reduced investment in large scale new attractions. This decline was compounded by the pandemic. The proposed development will deliver the first rollercoaster at Thorpe Park Resort in 10 years to significantly enrich the ride offer for guests to meet rising expectations and recover visitor numbers. If visitor numbers continue to decline the viability of the Resort would suffer and the associated socio-economic benefits for the local area would reduce.

6.73 The COVID-19 pandemic is an unprecedented situation which severely impacted the Resort’s number of visitors and trading in both the 2020 and 2021 season, as explained in paragraph 2.8.

Thorpe Park Resort is on a recovery trajectory following the pandemic and there is a need for further investment to support this. The performance of the theme park has to some extent been buoyed during this time by limitations on overseas travel, thus increasing the number of people holidaying in the UK and seeking out leisure opportunities. With the removal of such restrictions, Thorpe Park Resort will once again have to compete not only with the UK leisure market but also international options.

6.74 In parallel to the pandemic, the Resort is facing increased competition from other theme parks within the south east, most notably The London Resort which is due to open in 2024 and has the potential to divert a significant number of visitors from Thorpe Park Resort. Without evolving its offer, Thorpe Park Resort cannot compete. In the context of the pandemic and increased competition in the leisure market, there is a need for considerable investment to provide an exciting and new offer which can attract visitors to return to Thorpe Park Resort.

6.75 Planning policy strongly supports continued investment and enhancement at Thorpe Park Resort, recognising its contribution to the local economy, and the principle of development is established at paragraph 6.7 of this assessment. In combination with the above needs assessment, there is a compelling market need case for the proposed development.

Lack of alternative sites

6.76 There are no alternative sites for the development of a new ride at Thorpe Park Resort outside of the Green Belt and as set out at paragraph 6.3 the proposed ride is intrinsically linked to Thorpe Park Resort so cannot be located outside the Resort.

6.77 A thorough assessment of alternative sites inside the Resort has been undertaken to identify sites that would be of a sufficient size to accommodate a rollercoaster and ancillary facilities; that is available for development (and not identified for other Resort development); and that can be served by existing infrastructure or would require minimal upgrades.

6.78 Areas at the Resort considered include the following as shown at Figure 6.1 and a map is provided at Appendix 2:

- Island A (the second rollercoaster location approved in the MTDP) also within the core of the park was considered acceptable in principle for a rollercoaster up to 40m in height and so is an agreed location for a smaller ride that could come forward in due course.
- The surface car parks, which clearly serve an important ongoing purpose, the development of which would consequently lead to a need for reprovision elsewhere. The car park's position outside of the entrance to the Park and separation from the core of the theme park by the lakes would also cause considerable operational issues necessitating the need for further development of associated infrastructure to provide a ride on this site.
- The hotel site to the north, however, this is not available due to Thorpe Park Resort's long term aspirations to build the hotel scheme on this site. The hotel permission has been implemented and remains extant.
- The remainder of the core of the Resort is currently occupied by viable rides that add to the visitor experience. In comparison, the proposed development site presents an underused part of the Resort, given the rides are closed or dated, and so is most in need of revitalising to improve the visitor experience.

6.79 Moreover, due to the nature of the proposed rollercoaster, the proposed development on an alternative site at Thorpe Park Resort would have a similar effect on public views of Thorpe Park Resort and openness within the Green Belt so would not present a sequentially preferable alternative.

- 6.80 The proposed application site is therefore most appropriate for the following reasons:
- 1 It is located within the core of the theme park close to other rides and attractions.
 - 2 It presents the efficient use of underused previously developed land as an opportunity to revitalise and repurpose an existing part of the theme park.
 - 3 It is surrounded by a long established tree belt that encloses the land to the south and east and screens views and minimises impacts on the surrounding landscape.
 - 4 The use of the land would avoid any potential conflicts with current operations or planned development at the Resort.

Other special reasons

- 6.81 The third part of the VSC case relates to whether there are other benefits/special reasons. In the case of this planning application, the projects result in several benefits.

Economic public benefits

- 6.82 Thorpe Park Resort is recognised as a high profile tourist attraction that is a major player in the local economy. The NPPF and RBC policies place significant weight on employment generation, investment and economic growth. These represent a key strand of sustainable development.
- 6.83 The proposed investment will ensure that Thorpe Park Resort can (i) remain a popular tourist attraction, (ii) improve its business performance helping it to recover from the significant impact that COVID-19 has had on its trading over the last two years, and (iii) generate more local community and economic benefits in addition to existing benefits, and help to secure these local benefits for the longer term by making the business more resilient.
- 6.84 The significant economic benefits that are predicted to arise from the construction and operation of the project should be given substantial weight in the planning balance. These are shown in the infographics provided at Appendix 1 and summarised at paragraph 6.10 For a large leisure operator like Thorpe Park Resort, the proposed investment sends out a positive message and will help implement the Government's policy for recovery in the tourism sector.

Community public benefits

- 6.85 Thorpe Park Resort plays an important role within the local community that extends beyond creating jobs for local people and the associated benefits. The importance of the Resort remaining competitive within the industry and attractive to visitors is vital to it continuing to invest in local community initiatives. The proposed development is essential to securing the future of the Resort and will therefore contribute to the continuation of wide-ranging local community benefits from Thorpe Park Resort. This is a relevant material consideration that carries weight in the very special circumstances case.
- 6.86 Some of the wider community benefits include:
- 1 Providing complimentary tickets and financial support to disadvantaged children through the Merlin's Magic Wand Charity so they can enjoy a day out at one of Merlin's attractions, including Thorpe Park Resort. Merlin has helped over 260,000 children and their families through this initiative.
 - 2 Providing high quality learning opportunities and activities for school children that are aligned to the National Curriculum in various subjects including Maths, Science or Marketing and Business, including 'speed lessons'.
 - 3 Thorpe Park Resort offers a variety of educational School events across the year. Previously held events include 'Eureka Careers Events' and the 'STEM Fair'.

- 4 Thorpe Park Resort hosts the RBC 'Junior Citizen' programme on site in the Dome. This scheme is open to all year 6 primary school children, comprising 900+ pupils from 21 schools, and provides vital life skills to prepare the children for transition to secondary school, and to help them be model 'Junior Citizens'.
- 5 Thorpe Park Resort offers complimentary local residents' tickets (x4 per household) to residents within the Thorpe Ward Boundary.
- 6 Thorpe Park Resort makes financial donations to 'in-need' local community groups, the most recent being £5,000 to the local Judo Club 'Core Judo' located in Thorpe Green.
- 7 Carrying out various complimentary soft landscaping tasks, cutting grass and attending to tree maintenance at the local children's day nursery and wider community areas in proximity to Thorpe Park Resort.
- 8 Regular support at Thorpe Village Summer Fair with equipment and set up etc.
- 9 Support to the RBC Mayoral Fundraising Charity with award of auctions items etc.

6.87 Although quantifying these community impacts is more difficult, these charity and local community initiatives supported by Thorpe Park Resort deliver a wide range of benefits to the local area that represent important elements of supporting social life within the community. It is only through the continued success of the Resort that Merlin can continue to support these community initiatives.

Environmental public benefits

6.88 The proposed development will deliver enhanced landscaping through additional tree planting and will create new habitats for wildlife as explained at paragraph 6.19 and Table 6.3 and within the Ecological Impact Assessment and Tree Survey and Impact Assessment. The proposed development will deliver a biodiversity net gain of 10%.

Summary

6.89 Without prejudice to the view that the proposed development comprises an exception to inappropriate development in the Green Belt as redevelopment of previously developed land, should the Council consider there is harm the above reasons amount to a Very Special Circumstances case of substantial weight that clearly outweighs any harm to the Green Belt.

7.0 Conclusion

- 7.1 This application seeks planning permission for an exhilarating new rollercoaster at Thorpe Park Resort which will revitalise a currently underused part of the Resort. The rollercoaster will be accompanied by a station building, maintenance building, food and drink units with a photo shop alongside an extensive landscaping scheme. The development will enhance the ride offer at the theme park and forms an important part of the recovery strategy from the pandemic to encourage visitors back to Thorpe Park Resort, particularly in the face of increasing competition within the leisure industry.
- 7.2 The design has been subject to pre-application discussions with Runnymede Borough Council and public consultation. This Planning Statement assesses the proposed development in the context of relevant national and local planning policy. This Statement should be read alongside the various other reports which accompany the planning application.
- 7.3 The application presents sustainable development and both the NPPF and Runnymede Local Plan recognise the importance of the continued success of the leisure industry in supporting the local economy. Thorpe Park Resort is recognised as a high profile local tourist attraction and the proposed development will enable the theme park to continue its recovery trajectory from the pandemic and make a substantial and valuable contribution to the prosperity of the Borough. Overall, the proposed development is considered acceptable for the following reasons:
- 1 The principle of continued investment and enhancement of Thorpe Park Resort is strongly supported by national and local policy and due to the nature of development being intrinsically linked to the theme park, the sequential test is complied with.
 - 2 The development is considered to be an exception to inappropriate development in the Green Belt as the redevelopment of previously developed land that does not have a greater impact on the openness of the Green Belt in line with NPPF paragraph 149. Should the Council consider otherwise, a substantial very special circumstances case exists, whereby any harm identified to the Green Belt or other harm is demonstrably outweighed by the economic and environmental public benefits arising from the development. Regardless of the approach followed, the proposed development can be found acceptable in Green Belt terms.
 - 3 The proposal will revitalise an underused part of the Resort to deliver a high quality scheme that will contribute to the local character and context. The layout is well integrated within the site and allows the retention of significant existing trees. A bespoke theme will be delivered with the colour scheme reflecting a lighter colour for the taller sections of track to blend into the sky.
 - 4 The proposals will ensure that the economic benefits of Thorpe Park Resort are retained and increased including: A total addition of 31 jobs from the proposed development itself. In turn, the Resort supports 185 permanent jobs and 853 seasonal jobs along with 265 jobs created indirectly by visitor spending in shops, hotels and restaurants in the local area. A further 89 jobs will be created during the construction stage of the development. Moreover, it will lead to an additional £17.5m indirect and induced operational expenditure annually and draw a further £13.6m visitor expenditure per year in local shops, hotels, restaurants etc. from overnight visitors to the Resort.
 - 5 A comprehensive landscaping scheme will contribute to the overall greening of the site with substantial new planting that will lead to an increase in tree coverage of 45% across the site, more than compensating for the low quality trees removed as a result of the development.

- 6 With respect to visual impact, Thorpe Park Resort sits discretely within its landscape setting. The careful and considerate positioning and theming of the ride will ensure that views of the new ride are reduced by utilising and adding to the existing tree belt screening around the edge of the site. Where the proposed rollercoaster will be visible, the structure will be seen within the context of existing rides in the main developed core of the Resort, meaning the character of views will remain unchanged.
- 7 The setting and significance of Thorpe, Laleham and Chertsey Conservation Areas will be preserved, along with the associated heritage assets within these including the listed buildings at Thorpe Park Resort. Similarly the setting of nearby listed buildings including the Grade II* Cemex House to the north of the site will also be preserved.
- 8 The proposed development will be acceptable in flood risk terms with sufficient capacity in the flood compensation bank at Thorpe Park Resort to accommodate the development. Appropriate design mitigation has been incorporated into the scheme including a sustainable drainage scheme which will attenuate surface water from the development in line with policy requirements.
- 9 The scheme will be compatible with the emerging River Thames Flood Relief Scheme to be delivered by the Environment Agency in line with Policy LP Policy EE13.
- 10 A Biodiversity Net Gain of 10% will be achieved on site through new woodland planting and habitat creation. In addition, appropriate mitigation measures have been recommended to ensure that the development will not have an adverse impact on the nearby designated sites or priority species. The development is therefore acceptable in ecology terms.

7.4 In addition, the proposed development will be acceptable with respect to noise impact, highways impact, sustainability, and contamination.

7.5 Accordingly, the proposed development accords with the statutory development plan and should therefore be granted planning permission.

Appendix 1 Infographics

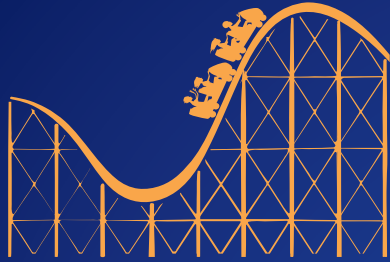
The Economic Footprint of Thorpe Park

01 EMPLOYMENT EFFECTS

185 Jobs

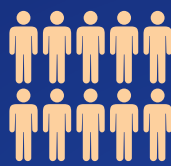
Permanent Employment

[185 people are employed permanently by Thorpe Park]



Construction Employment

[temporary construction jobs supported by capital investment in 2021]



10 Jobs



853 Jobs

Seasonal Employment

HOTEL



265 Jobs

Visitor Related Employment

[annual jobs (FTE) supported by visitor spending in shops, hotels, restaurants and other service facilities]

02 OPERATIONAL EXPENDITURE



£13.7m

Annual Wage Bill



£20.9m

Supplier
Expenditure
[per annum]



£2.1m

Capital
Expenditure
[per annum]



£1.0m

Annual Business
Rates



£17.5m

Indirect & Induced Expenditure

[operational expenditure recycled each year within the region to produce other forms of income]

03 VISITOR EXPENDITURE



£51.1m

Annual Visitor Spending in Thorpe Park
[accounts for a significant proportion of annual tourism expenditure in Runnymede]



£13.6m

Off-site Expenditure
by Overnight Visitors

[25% of visitors stay overnight and spend money in hotels, shops and services each year]



£3.4m

Off-site Expenditure
by Day Visitors

[spending prior to arriving at the park on goods and services each year by day visitors]

04 TOURISM AND COMMUNITY IMPACTS



Flagship Attraction Raising
Profile of Runnymede



Introduces Visitors to
Other Local Attractions



Visitor Expenditure in
Local Shops and Services



Community Focus with Education
and Charitable Projects

Design and analysis by Lichfields (Copyright 2022)

Thorpe Park is one of the largest and most popular themed attractions in the UK delivering substantial economic benefits locally, regionally and nationally.

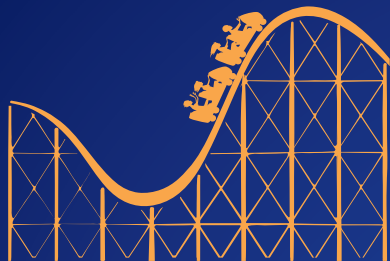
The Economic Footprint of Project Exodus

01 EMPLOYMENT EFFECTS

31 Jobs

Permanent Employment

[31 people are supported by the proposed development]



Construction Employment

[temporary construction jobs supported by capital investment generated by the proposed development]



123 Jobs

Seasonal Employment

89 Jobs



HOTEL

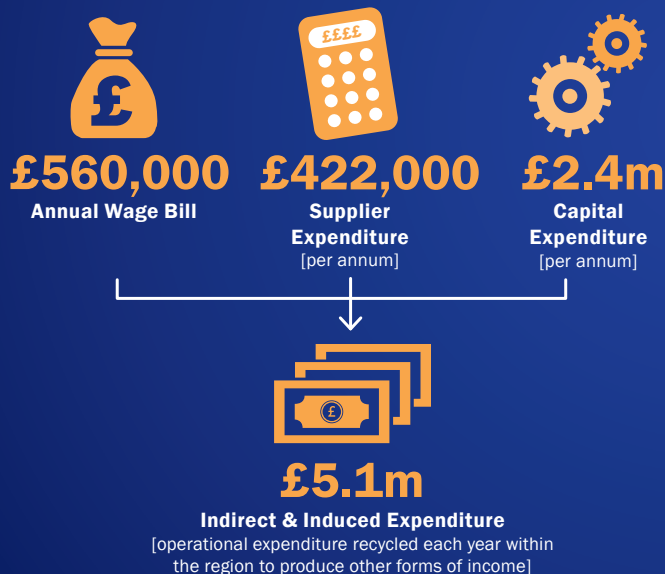


4 Jobs

Visitor Related Employment

[annual jobs (FTE) supported by additional visitor spending at the proposed development]

02 OPERATIONAL EXPENDITURE



03 VISITOR EXPENDITURE



04 TOURISM AND COMMUNITY IMPACTS



Flagship Attraction Raising Profile of Runnymede



Introduces Visitors to Other Local Attractions



Visitor Expenditure in Local Shops and Services

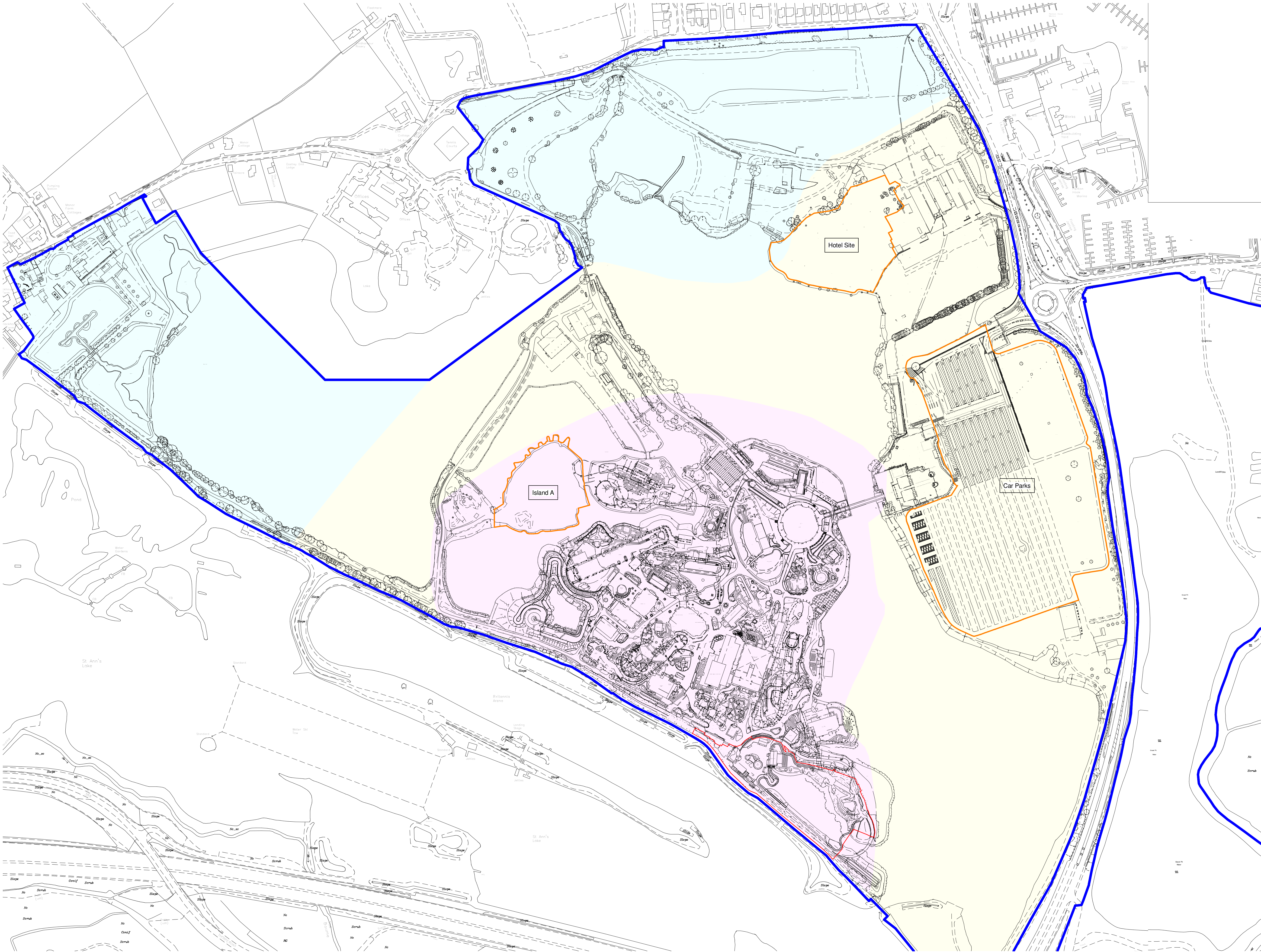


Community Focus with Education and Charitable Projects

Design and analysis by Lichfields (Copyright 2022)

Thorpe Park is one of the largest and most popular themed attractions in the UK delivering substantial economic benefits locally, regionally and nationally.

Appendix 2 Alternative site locations



1 Alternative Location Considerations
SCALE 1 : 2500

BM 360/TP24 ExodasTP24-SA-XX-XX-M3-A-0001.rvt

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.

Drawing prepared utilising drawings prepared by:

On Centre Surveys Drawing: 11076BX-1 Land & Utility Survey.dwg extract of 11076BX MASTER LAND SURVEY JUNE 2021.dwg

and

Ian Keen Ltd Drg: 1769-KC-XX-YTREE-TreeConstraintsPlan01Rev0.dwg

Specialist tree protection hoarding in accordance with BS 5873 Fig 2. & to the satisfaction of Ian Keen Ltd - Refer to drawing:1769-KC-XX-YTREE-TreeConstraintsPlan01Rev0.dwg for details and locations of hoarding and root protection areas.

Refer to Drawing Reference 472-105-5 for Landscape Proposals

NB: Information on this drawing is considered to be reliable. Smytheman Architectural take no responsibility for any unknown alterations undertaken during the construction process.

- Key:**
- Application Boundary
 - Ownership Boundary
 - Alternative Site Boundary
 - Pink Zone (Development Zone)
 - Yellow Zone (Service Zone)
 - Blue Zone (Quiet Zone)

Rev	Date	By	Detail
Drawing status			
S3			
Client			
MMM			



Project/Location

Thorpe Park Resort,
Staines Road,
Chertsey,
KT16 8PN

Drawing title

Alternative Location Considerations

Date	Drawn	Checked	Job No.
11.02.22	AD	-	3198

Scale(s)

As indicated @A1

Drawing number	Revision
TP24-SA-XX-XX-DR-A-0109	

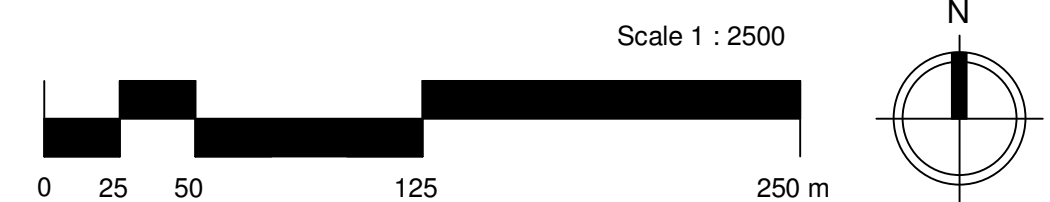


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