

Runnymede Borough Council
Development Control
Civic Offices Station Road
Addlestone
Surrey
KT15 2AH

██████████
Your ref:

████████████████████
RU.22/0374

Date:

31 August 2022

Dear Sir/Madam

Redevelopment of "old town" area within theme park, to install a rollercoaster along with associated buildings and structures, ground works infrastructure and infilling of part of lake and landscaping following the demolition of existing buildings and structures.

Thorpe Park Staines Road Chertsey KT16 8PN

Thank you for consulting us on the above application, on 7 July 2022. Please accept our sincere apologies for the delay in our response and any inconvenience caused.

Environment Agency position

We have reviewed the Construction Environmental Management Plan July 2022; Draft Landscape and Ecology Management Plan; and Ecological Impact Assessment June 2022 and consider that it satisfactorily addresses our earlier concerns, as set out in our response ref: WA/2022/129705/01, dated 08 June 2022. We therefore withdraw our previous objection, Objection 03 - nature conservation value.

However, the Flood Risk Assessment dated June 2022 and letter from Atkins, dated 25 April 2022 (Additional Flood Risk Information) does not satisfactorily address our earlier concerns. We therefore **maintain our objections – Objection 01 and 02.**

Objection 01

In accordance with paragraph 159 of the National Planning Policy Framework (NPPF) we **object** in principle to the proposed development as it falls within a flood risk vulnerability category that is inappropriate to the Flood Zone in which the application site is located. The application is therefore contrary to the NPPF and its associated Planning Practice Guidance (PPG). We recommend that planning permission is refused on this basis.

Reason 01

The PPG classifies development types according to their vulnerability to flood risk and provides guidance on which developments are appropriate within each Flood Zone. This site lies within Flood Zone 3b Functional Floodplain, which is land defined by your Strategic Flood Risk Assessment as having a high probability of flooding.

We note the FRA states: '*...the lower part of many of the rollercoaster columns will be at risk of flooding, including some columns which are located in the lake. The columns will be, by their nature, water compatible...*' The development is classed as 'less vulnerable' in accordance with Table 2 of the Flood Zones and flood risk tables of the PPG. Tables 1 and 3 make it clear that this type of development is not compatible with this Flood Zone and therefore should not be permitted.

Overcoming objection 01

The only way the applicant can overcome our **in principle objection** is to demonstrate that the development is not within Flood Zone 3b - Functional Floodplain.

If the applicant is able to demonstrate that the development is not within Flood Zone 3b – Functional Floodplain the following objections would need to be addressed:

Objection 02

In accordance with policy Runnymede 2030 Local Plan in the Policy EE13: Managing Flood Risk and paragraph 167 of the National Planning Policy Framework (NPPF) in the absence of an acceptable flood risk assessment (FRA) we **object** to this application and recommend that planning permission is refused.

Reason 02

The submitted FRA does not comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the planning practice guidance. The FRA does not therefore adequately assess the flood risks posed by the development. In particular, the FRA fails to:

- consider how people will be kept safe from the identified flood hazards. Flood risk mitigation measures to address flood risk for the lifetime of the development included in the design are inadequate because they will not make the development resilient to the flood levels for 1% annual probability (AP), plus an appropriate allowance for climate change, flood extent. Consequently the development proposes inadequate flood storage compensation

Overcoming Objection 02

To overcome our objection, the applicant should submit a revised FRA which addresses the points above. Specifically, the FRA needs to address the following:

Existing floodplain compensation agreement

We understand the construction of the new rollercoaster, rollercoaster support columns, associated buildings and the partial infill of the inlet of the Abbey Lake will result in a change of floodplain storage at Thorpe Park.

Section 4.1.4 of the FRA explains that a floodplain compensation scheme was agreed in 2010 between the Environment Agency and the Council, as part of Thorpe Park's Medium Term Development Plan (MTDP) FRA (Atkins, 2010)). We understand the agreement sets out that a previously excavated area has been provided to offset any future losses of floodplain volumes, caused by development in the park. However, we still have not had sight of this agreement. Without sight of the agreement, we cannot be

satisfied that there is an appropriate floodplain compensation scheme in place and that development at Thorpe Park does not increase flood risk elsewhere. We request a copy of this agreement is provided.

Compensatory storage area

The FRA states the previously excavated compensatory storage area is hydraulically connected to the floodplain at Thorpe Park Resort and the scheme has been designed on a level for level basis in 100mm increments. We welcome the inclusion of the compensation table within the FRA. However, we note the compensatory storage area is outside of the application boundary and the exact location of the compensation area has not been included. The FRA should be updated detailing the location of the compensation area. Without this we cannot be satisfied that the compensatory area is hydraulically linked.

Construction phase

We note there are two parts to this proposal: part 1 - the construction phase; and part 2 - the operational phase. The operational phase (i.e., the completed development) will result in a permanent change in floodplain storage, whilst the construction phase will result in a temporary change in floodplain storage.

We understand the construction phase will result in a greater, temporary, loss of floodplain storage compared to the final operational phase. The FRA explains that the partial infill of the Abbey Lake inlet, required during the construction phase, will be between levels of 12.7m to 12.9m Above Ordnance Datum (mAOD). The FRA states that there is sufficient capacity in the existing compensatory storage area to temporarily compensate for this increased lake infill during construction. The FRA explains that due to a loss of hydraulic connectivity with Abbey Lake during the construction period (approx. 16 months), up to a 5% AP event, more floodplain storage will be temporarily lost. This statement is not expanded so it is unclear within the FRA whether the volume lost through losing hydraulic connectivity is accounted for within the compensation volume? Can the applicant confirm if the volumes lost is included in the calculation?

Floodplain volumes – existing and new surplus

Table 4-2 Floodplain compensation in the FRA sets out the pre-development surplus and proposed development (and post surplus) volumes. Whilst we can see there is surplus for the proposed works in the table, we do question the volume surplus following the works. For example, slice level 12.90m AOD shows existing surplus at 578m³. The new surplus volume following the development is shown to be 389m³. The volume from the proposed works in this slice would be 364m³. Taking this volume from the existing surplus of 578m³, this equates to 214m³ left for that slice (not 389m³). This should be explained as this does not add up.

The FRA should confirm the correct volumes and provide further information in relation to this. We request that the FRA clearly sets out the difference in volumes between the proposed temporary work i.e., the construction phase and the permanent works i.e., the operational phase.

Detailed design stage

We note the FRA states the extent of cut will be established at the detailed design stage and the submitted information are outline designs/estimates. It is our understanding that this is a full planning application, not outline, and therefore all detailed designs must be presented and agreed at this stage. Without the exact details we cannot be confident that any changes to the design can be accommodated without increasing flood risk elsewhere. We request that all final design details and calculations are submitted.

Advice to LPA – Call-in

If you are minded to approve this application for major development contrary to our flood risk objection, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2021.

This statutory instrument prevents you from issuing planning permission without first referring the application to the Secretary of State for Housing, Communities and Local Government (via the National Planning Casework Unit) to give them the opportunity to call-in the application for their own determination. This process must be followed unless we are able to withdraw our objection to you in writing. A failure to follow this statutory process could render any decision unlawful, and the resultant permission vulnerable to legal challenge.

Advice to LPA – Existing compensation scheme

It is not clear if the existing compensation scheme was secured by a legal agreement or planning condition as part of a previous application at Thorpe Park. We would welcome any additional information/clarity on the matter.

Advice to LPA and applicant - Flood resilience

With regard to flood resilience the FRA explains that the control room, ride maintenance building and rollercoaster boarding platform finished floor levels (FFLs) are above the design level of 1% AP flood extent, with a 35% allowance for climate change. However, the beverage unit and photo opportunity building are set at a lower level.

Whilst the FFL are not appropriate, we note this is a less vulnerable development. It should be noted that if the FFLs are not set to the 1% AP flood extent, with a 35% allowance for climate change, they are likely to flood.

Advice to LPA and applicant - Boundary treatment

The applicant has confirmed that new fencing will be open in design and not impede flood flows, which we welcome. Fencing and other boundary treatments can increase flood risk. We would wish to see this aspect covered by planning condition so that boundary treatment is permeable to floodwater.

Final Comments

Thank you again for consulting us on this application. Our comments are based on the best available data and the information as presented to us.

If you are minded to approve the application contrary to our objection, please contact us to explain why material considerations outweigh our objection. This will allow us to make further representations. Should our objection be removed, it is likely we will recommend the inclusion of condition(s) on any subsequent approval.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below. Please quote our reference number in any future correspondence.

Yours faithfully


Planning Advisor


