## **Project Pivot Planning Statement**

**Thorpe Park Resort** Merlin Attractions Operations Limited 29 October 2024

**LICHFIELDS** 

## LICHFIELDS

# Lichfields is the pre-eminent planning and development consultancy in the UK

We've been helping create great places for over 60 years.

### lichfields.uk

© 2024 Nathaniel Lichfield & Partners Limited (trading as "Lichfields"), All Rights Reserved, is registered in England, no. 2778116. Registered office at The Minster Building, 21 Mincing Lane, London EC3R 7AG. Formatted for double sided printing.

Plans based upon Ordnance Survey mapping with the permission of His Majesty's Stationery Office. © Crown Copyright reserved. Licence number 10007707 04858/49/NT/AG

32959125v7

### Contents

1.0	Introduction	1
2.0	Background	2
	Thorpe Park Resort	2
	Application Site and Surroundings	2
	Planning History	4
3.0	Proposed Development	6
4.0	<b>Relevant Planning Policy and Guidance</b>	8
	Statutory Development Plan	8
	Material considerations	9
5.0	Planning Assessment	10
	Principle of development	10
	Green Belt	11
	Design and landscape	13
	Flooding	13
	Drainage	14
	Noise	14
	Ecology	15
	Trees	16
	Transport	17
6.0	Conclusion	18

### **Introduction**

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 visitor plaza, referred to as 'Project Pivot' at Thorpe Park Resort. The description of development is:

"Redevelopment of the beach area including demolition of structures, installation of new buildings, a stage, hard and soft landscaping, infrastructure and associated works."

- 1.2 The development site extends to 0.3 ha and is located in a central area of the Thorpe Park Resort, currently comprising the northern part of the Amity Beach area.
- <sup>1.3</sup> 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.
- 1.4 A list of the planning drawings and documents comprising this submission is provided in the accompanying covering letter.

### 2.0 Background

#### **Thorpe Park Resort**

- 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.
- 2.2 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; Tidal Wave, one of the UK's wettest water rides and Hyperia, the tallest and fastest roller coaster in the UK. Alongside the rides, the Resort includes various food and beverage options as well as 90 bedrooms located in the Shark hotel.

### **Application Site and Surroundings**

The application site is located in a central part of the Thorpe Park Resort, west of The Dome and the main entrance, as shown in Figure 2.1. The site comprises the northern section of Amity Beach area ('the Beach').

Figure 2.1 Aerial photo of Thorpe Park Resort showing location of Project Pivot



Source: Google Earth

2.3

- 2.4 The Beach consists of an artificial beach and pool area, along with associated landscaping. There are four small existing buildings on the site, consisting of a kiosk, two sheds, and an "electricals" shed. These are scattered across the site area, with the kiosk located on the site's western perimeter. There is existing vegetation in the northern part of the site, including shrubs and low-level planting. There are no trees within the site boundary. Photographs of the site's existing condition are shown in Figures 2.1 and 2.2 below.
- <sup>2.5</sup> The site is accessed from within the Thorpe Park Resort via a pedestrian entrance close to the Dome.
- 2.6 Surrounding the Thorpe Park site is Fleet Lake, Abbey Lake, and Manor Lake and beyond these to the south-west is St Ann's Lake which includes the Thorpe Lakes water sports attraction.



Figure 2.2 View from within the site looking north

Source: Thorpe Park Resort



Figure 2.3 View from within the site looking west

Source: Thorpe Park Resort

### **Planning History**

- 2.7 The Beach has been in place at Thorpe Park since the 1980s and its design has remained largely unchanged.
- 2.8 Thorpe Park Resort itself 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.
- 2.9 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; and

• Floodplain compensation scheme in the form of the creation of new flood compensation areas.

2.10 One of the potential MTDP round ride locations was located within and around the Beach development (see extract from MTDP approved drawing ref. 472-9 101 rev A "General Plan" below).



Source: Application ref. RU.10/0579 Runnymede Borough Council

- 2.11 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).
- 2.12 The MTDP provides important context and should be considered a material consideration in the determination of applications moving forward.
- <sup>2.13</sup> The application site is located within the pink zone and the established core development area of the Resort and in an area suitable for a new round ride.
- 2.14 With respect to the installation of stages planning permission has been received previously for two outdoor stages at Thorpe Park (ref. 15/0674). The approved stages were located adjacent to Abbey Lake (The Crust Stage, with a capacity for 2,000 guests) and the Tidal Wave stage (located to the south of Tidal Wave and north-east of Amity Diner, with a capacity of 600 people). These stages operated during 2015 and were then removed. Thorpe Park has confirmed that no complaints were received in relation to the operation of these stages in the core of the Resort.

### **3.0 Proposed Development**

3.1 The application comprises the redevelopment of the existing artificial beach and pool area which has become tired and underused to deliver a new plaza for visitors to gather and relax within the Resort. This application seeks permission for:

> "Redevelopment of the beach area including demolition of structures, installation of new buildings, a stage, hard and soft landscaping, infrastructure and associated ground works."

3.2 The proposals provide visitors with new seating areas, food and beverage kiosks and a stage area. The proposals also include landscaping and back of house areas, including green rooms, tech rooms and plant rooms.

Existing/ Proposed	Description	Floorspace (sqm GIA)
Existing	Electricity Shed	6 sqm
	Shed 1	2 sqm
	Shed 2	6 sqm
	Kiosk	10 sqm
	Total	24 sqm
Proposed	Green Room 1	29.5 sqm
	Green Room 2	29.5 sqm
	Kiosk 1	20.2 sqm
	Kiosk 2	20.2 sqm
	Kiosk 3	20.2 sqm
	Tech Room 1	13.7 sqm
	Tech Room 2	7 sqm
	Plant Room	36.4 sqm
	Total	176.7 sqm

Table 3.1 provides an overview of the existing and proposed floorspace.

Table 3.1 Existing and Proposed Floorspace

- 3.4 The stage is open sided and therefore does not constitute enclosed building floorspace under the RICS guidelines.
- 3.5 The proposed new seating and gathering area will provide a location for visitors to dwell when they arrive in the morning prior to the rides opening, and after they have passed through the ticket kiosks and security/bag check. This will assist in reducing queues and improve guest experience. During the day when the rides are open, the new area will provide guests with a meeting and rest space and additional opportunities to purchase refreshments.
- 3.6 The stage will allow Thorpe Park to centralise the existing shows and performances that already take place through the day. These shows currently take place in separate locations throughout the core of the park and the stage will allow Thorpe Park to provide one centralised place for these shows to take place. The shows will not add to the noise

3.3

environment as they already take place through the day until the park closes. In addition, it is proposed that the stage will host up to 18 shows/events over the season for bands where the music will be louder and more like a concert format (capacity of 2,000 guests). These events will take place through the year. To protect residential amenity, noise levels will be reduced at 11pm to the pre-agreed park levels.

An illustrative image of the proposed plaza looking towards the proposed stage is provided below. To the right of the image is the existing Depth Charge attraction.



#### **Pre-application**

3.8

Initial pre-application discussions were held with Officer, Catrin Davies on 24 September 2024 who confirmed the scope of the application and the required deliverables.

3.7

### **Relevant Planning Policy and Guidance**

4.1 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".

4.2 This section identifies key planning policy and guidance at a national and local level of relevance to the proposed development. A particularly material matter is the fact that the application site is a long established and developed part of Thorpe Park.

#### **Statutory Development Plan**

- 4.3The statutory development plan for the site comprises the Runnymede 2030 Local Plan<br/>(LP) (adopted July 2020) and the Thorpe Neighbourhood Plan (adopted June 2021).
- 4.4 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 Thames Basin Heaths SPA 5-7km Buffer Zone (LP EE10); and
  - 4 Biodiversity Opportunity Area (LP EE11).
- 4.5 Additional development plan policy designations which affect the surroundings of the development site are:
  - 1 Special Protection Area Manor Lake (LP EE9 and EE10);
  - 2 Special Protection Area, Site of Specific Scientific Interest and Ramsar St Ann's Lake (LP EE9);
  - 3 Areas of High Archaeological Potential & County Sites of Archaeological Importance Abby Meads Gravel Pits (LP EE7); and
  - 4 Site of Nature Conservation Importance Abbey Lake Complex SNCI (LP EE9).
- 4.6 Thorpe Park Conservation Area is located approximately 0.7km 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 Listed properties within the village and within the former farm itself including, Manorhouse Farm House, Manorhouse Farm Barn and The Shire Barn are listed.
- 4.7 The following policies are relevant to our assessment of the application:

#### Runnymede 2030 Local Plan

- SD3 Active & Sustainable Travel;
- SD4 Highway Design Considerations;
- SD7 Sustainable Design;
- EE1 Townscape and Landscape Quality;
- EE2 Environmental Protection;

- 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; and
- Neighbourhood Plan Policy TH5 Green and Blue Infrastructure.

#### Thorpe Neighbourhood Development Plan 2015-2030

• Policy TH7: Green and Blue Infrastructure.

### **Material considerations**

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 2023): 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); and
- Runnymede Green and Blue Infrastructure Supplementary Planning Document (adopted November 2021).

4.8

### 5.0 Planning Assessment

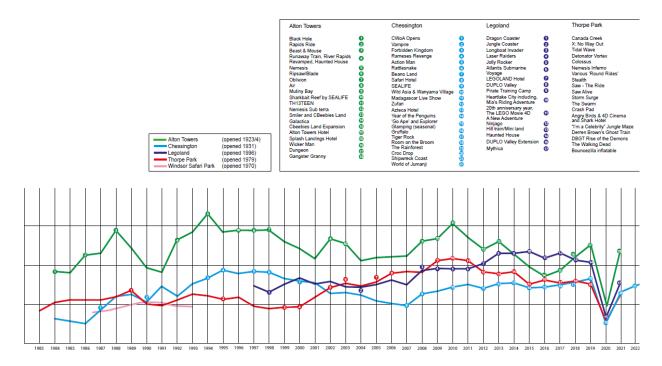
- 5.1 In accordance with Section 38(b) of the Planning and Compulsory Purchase Act (2004), this section considers the acceptability of the proposed development against the statutory development plan and other material considerations.
- 5.2 Based upon the relevant policy and guidance identified in Section 5.0 of this report, the key issues for consideration are:
  - 1 Principle of development;
  - 2 Green Belt;
  - 3 Design and landscape;
  - 4 Flooding;
  - 5 Drainage;
  - 6 Noise;
  - 7 Ecology and BNG;
  - 8 Trees; and
  - 9 Transport

### **Principle of development**

- Planning policy at both national and local level supports the growth of the tourism and leisure sector. The NPPF encourages the creation of conditions in which businesses can invest, expand and adapt (paragraph 85). In particular, in supporting a prosperous rural economy, planning decisions should enable sustainable rural tourism and leisure developments which respect the character of the countryside (paragraph 88).
- This is reiterated by Local Plan Policy IE4 (The Visitor Economy) which states that planning applications will be supported where they deliver a high-quality visitor experience that increases the contribution that tourism makes to social and cultural wellbeing and economic growth, subject to complying with the NPPF sequential test and preserving the Borough's special heritage and natural environment. 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).
- 5.5 The sequential test is met as the proposed development is an existing theme park and the proposals seek to enhance an existing developed part of the Resort. The site sits within the heart of the Resort and currently comprises an underused artificial beach and pool area. Given the climate of the UK, there are only limited times of year when visitors can make use of the existing facility and therefore it does not serve as an efficient nor effective use of space within the park. Furthermore, the existing beach and pool facilities are ageing and no longer in good condition, and investment in new facilities is required to encourage visitors to this area of the site. Without continual investment visitor numbers will decline over time (see theme park admissions chart below demonstrating the importance of continual investment).

Figure 5.1 Chart showing theme park admissions

#### THEME PARK ADMISSIONS



Source: Lichfields chart using data provided by Merlin Entertainments

5.6 The proposed development will provide visitors with a space to dwell and relax and will consolidate the existing show facilities that are provided across the core of the Resort into one focused area. This will enhance the existing facilities on offer, make an efficient use of land and provide much-needed investment to an existing underused part of the site. On this basis the proposals are acceptable in principle and meet policy requirements, in particular Policy IE4 (The Visitor Economy).

#### **Green Belt**

- 5.7 The site is located within the Green Belt and comprises previously developed land. 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 154). 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 Local Plan Policy EE17.
- 5.8 Depending on how the project is viewed it either comprises partial redevelopment or infilling; this perhaps is a distinction that does not need to be of particular concern as both mean the proposal is acceptable subject to the assessment of impact on openness.

#### **Impact on Openness**

5.9 The NPPF states that limited infilling or 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. The references to 'limited infilling' and 'redevelopment' allows new development as any 'infill' or redevelopment 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.

5.10 Local Plan 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 Beach development has been in place for over 30 years and is lawful.
- 2 Height of existing and proposed buildings and disposition around the site: The existing buildings on the site comprise small single-storey ancillary buildings, including a refreshment kiosk, two sheds, and an electricals building, which are all scattered across the site area. All existing buildings are proposed for demolition. The proposed development includes eight new buildings, all of which are very minor in scale, and a new open-sided stage, which extends to a maximum height of 9.9 metres. Whilst the height of the stage represents an increase in relation to the existing structures within the application site itself, it is wholly in line and subordinate to the scale of other attractions in the immediate vicinity (see site section 472/110/11 which includes the Dome at 13.7m, Depth Charge at 17.95m) and is barely visible when viewed from the north east in the submitted longer section (ref. 472/110 9). This section includes Saw (30m), Colossus (30m), No Way Out (19.29m), Nemesis (29m), Detonator (35m) and Stealth (62.5m). These sections demonstrate that there will be no impact when assessed in terms of the visual component of openness.
- 3 **Phasing of proposed development including any demolition**: Demolition of the existing structures necessary to carry out the development will 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.
- 5.11 The other considerations set out in Policy EE17 are the existing and proposed floorspace and footprint; existing and proposed hardstanding; development envelope and amount of undeveloped area; and the relationship with existing landscape features and integration with surroundings. Given the interrelationship of these matters we consider these together.
- 5.12 The overall site, in terms of its pattern and grain of development, will not be materially altered by this application. The resort is characterised by amusement rides/attractions set in a hard and soft landscaped setting, with ancillary buildings, "street furniture" and infrastructure. In this application there is some additional floorspace but reduced hard landscaping compared to the existing development, reducing from 85% of the site area to 69%. Overall, the Resort's pattern and grain is maintained and in turn its effect on green belt openness, in spatial terms, is unaltered.

- 5.13 Based on the above, the proposals fully comply with the requirements of the NPPF and will have no greater impact on the openness of the Green Belt than the existing development. The proposed development comprises either partial redevelopment or infilling in line with the exception tests set out in the NPPF. The site occupies a central location within the wider Thorpe Park site. It is already developed and is surrounded by built form on all sides. Due to its location and the character of the site and surroundings, the proposed development has no greater impact on the openness of the Green Belt than the existing development.
- 5.14 Therefore, the proposals are fully in accordance with the requirements of the NPPF and Local Plan Policy EE17.

### **Design and landscape**

- 5.15 Local Plan Policy EE1 requires all development to achieve high quality and inclusive design that responds to the local context, while making efficient use of land. Development proposals will be supported where they contribute to and enhance the quality of the public realm and/or landscape setting through high quality hard and soft landscaping schemes.
- 5.16 The design of the proposed development is high-quality and will significantly improve the condition of the existing site. The proposals will make use of appealing colours and materials that are visually attractive for visitors to the site. The proposals will be fully inkeeping with the character of the site's surroundings in a theme park.
- 5.17 With regard to hard landscaping, permeable resin is proposed throughout the majority of the site, with paved flooring in the area behind the stage. Soft landscaping is also proposed, (as shown on drawing ref. 472/110 7) with a combination of tree planting, shrubs, bamboos, and climbers.
- 5.18 The proposals will deliver high-quality design and landscaping that effectively respond to its context. On this basis, the proposed development complies with the requirements of Policy EE1.

### Flooding

- 5.19 Government guidance seeks to ensure that development is not at an unacceptable risk of flooding. Where development is unavoidable in areas at risk from flooding, the NPPF requires that the development is safe without increasing flood risk elsewhere and where possible reducing flood risk overall.
- 5.20 Local Plan Policy EE13 requires new development proposed in Flood Zones 2 or 3 to be accompanied by a site-specific Flood Risk Assessment (FRA) that demonstrates that all forms of flooding have been taken into account. Flood risk must be managed over the lifetime of the development, accounting for climate change impacts.
- 5.21 The FRA, prepared by Atkins, states the site has a 'high' risk of fluvial flooding, with the predominant flood mechanism outlined to be the simultaneous rise in the water level of the surrounding lakes. There is no risk of tidal nor groundwater flooding, and the risk of surface water and sewer flooding is deemed 'low'. The proposal is not expected to increase the risk of flooding.

- 5.22 To mitigate fluvial flood risk, the finished floor levels of the proposed buildings are above the 1% (1 in 100) Annual Exceedance Probability ('AEP') event, with a 35% allowance for climate change. The ground level of the site is also above the 1% (1 in 100) AEP event. Thorpe Park already has an established flood response plan and flood evacuation plan to uphold staff and visitor safety. The existing compensation scheme will compensate for the small area of floodplain lost through the proposed development.
- 5.23 Based on the above, the proposed development is considered to be at an acceptable level of flood risk and will not result in any increased flood risk to people or property. It has been designed in accordance with the principles of the NPPF and the requirements of Policy EE13 have been met.

### Drainage

- 5.24 Local Plan Policy EE13 requires previously developed sites to actively reduce run-off rates and volumes in comparison with pre-development. Paragraph 173 of the NPPF outlines the need for sustainable drainage systems to be incorporated into proposals.
- 5.25 The Drainage Strategy, prepared by HBL, identifies that the scheme will be designed to improve the local run-off profile by attenuation and reduction of run-off rates, offering a significant improvement on pre-development peak flow rates. The proposed discharge rate (4.6l/s) offers 50% betterment on existing brownfield 1 in 1-year runoff rate and significantly higher betterments on the 1 in 30-year and 1 in 100-year brownfield values.
- 5.26 In line with the drainage hierarchy, controlled discharge to the existing lake to the southwest is proposed. This method holds a significantly higher priority in the discharge hierarchy compared to the current outfall/overflow into the private combined drainage system at Thorpe Park. All proposed hardstanding will be permeable with attenuation within a gravel subbase storage layer. Attenuation storage for the 1-in-100-year event plus 45% climate change allowance will be provided within the sub-base storage layer and a network of filter drains.
- 5.27 Existing foul water drainage crossing the site will be retained or diverted as necessary. Any proposed foul drainage from the new buildings will be connected to existing private foul water drainage within the site.
- 5.28 Overall, the Proposed Drainage Strategy demonstrates that the proposed surface water drainage design will improve the local run-off profile by attenuating surface water within the application site boundary and will significantly improve the pre-development run-off peak flow rates. On this basis, the proposal accords with Local Plan Policy EE13 and the requirements of the NPPF with regard to drainage.

#### Noise

- 5.29 Local Plan Policy EE2 requires that new developments mitigate and minimise potential noise impacts. Proposals which have or would be subject to unacceptable adverse effects will not be supported.
- 5.30The proposals seek to refresh an existing area in the core of the Resort. The NoiseAssessment Report, prepared by Cahill Design Consultants, notes that the proposed stage<br/>will provide a centralised location for various entertainment performances that already take

place around the site during the opening hours of Thorpe Park. There is therefore not anticipated to be any material increase in the overall number of performances taking place at Thorpe Park with noise generation from the general shows not exceeding 85dBA within the audience area and taking place throughout the general opening hours of the theme park which vary through the year.

- 5.31 The only new activities will comprise up to a maximum of 18 days per annum where events can take place up to 95dBA within the audience area. These events will be carefully managed and will end at 11:00pm.
- 5.32 The assessment identifies noise from operational activities is expected to comply with the proposed criteria for appropriate sound levels at all noise-sensitive receptors for both dayto-day activities and special events using the stage. Even though compliance is achieved, the Noise Assessment Report outlines mitigation recommendations to be applied by Thorpe Park to ensure that music levels at all receptor locations are maintained within the proposed criteria. These mitigation measures can be conditioned.
- 5.33 It is therefore concluded that the proposals fully comply with the requirements of Local Plan Policy EE2.

### Ecology

- 5.34 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 180).
- 5.35 Local Plan Policy EE11 states the Council will encourage development proposals which restore, maintain and enhance habitat connectivity, in particular in Biodiversity
  Opportunity Areas (which includes the site). The aims are also reflected in Neighbourhood Plan Policy TH7 and The Green and Blue Infrastructure SPD.
- 5.36 Baker Consultant's Ecological Appraisal assesses the site for notable species previously recorded on or near the site by desk study or field survey. It identifies that there are no suitable habitats for bats, otters, water voles, or reptiles within the site area and that the habitat on site is largely unsuitable for most bird species due to high levels of noise and disturbance. However, there is some potential for nesting birds in areas of ornamental planting, which are to be removed as part of the proposals, meaning there could be potential impact on nesting birds during the construction period. Consequently, the Ecological Appraisal recommends that site clearance and similar operations should be undertaken outside of the bird breeding season (March-August) or by preventing birds from nesting through blocking access to nest sites, clearing vegetation or structures used for breeding, or using deterrents. Additional landscaping is proposed which will add to the ecological value and biodiversity of the site. It is therefore concluded that the proposals comply with Local Plan Policy EE11 and Neighbourhood Plan Policy TH7.

#### BNG

5.37

Biodiversity Net Gain is a statutory requirement, meaning that unless subject to a specified exemption, all developments are required to deliver at least 10% increase in biodiversity value relative to the pre-development biodiversity value. This is broadly reflected in Local

Plan Policy EE9 and Neighbourhood Plan Policy TH7, which states that net gains in biodiversity will be sought.

- 5.38 Of course, over many years Thorpe Park has taken a responsible and enlightened view introducing extensive ecological improvements at the site, for example softening and creating high quality edge conditions to extensive lake edges.
- 5.39 Baker Consultant's Biodiversity Metric Calculation states that the current value of the site in Biodiversity Units is 0.11, meaning a 10% net gain requires a post-development figure of 0.12. The proposals will include the creation of new developed land, sealed surface, and new introduced shrub. The proposed site design achieves a figure of 0.05 units, representing a shortfall of 0.07 units. Therefore, to achieve a 10% net gain, an offsite compensation area is proposed within the wider Thorpe Park site. An appropriate scheme to ensure the 10% net gain can be agreed when the BNG condition is discharged.
- 5.40 On this basis, the BNG statutory requirement will be met and the proposals will accord with the requirements of Local Plan Policy EE9 and Neighbourhood Plan Policy TH7.

#### **Green and Blue Infrastructure**

- 5.41 Runnymede's Green and Blue Infrastructure ('GBI') Checklist, contained within the Green and Blue Infrastructure SPD, is designed to ensure that development proposals clearly address biodiversity impact and net gain, open space, and landscaping. The response should be proportionate to the scale of development.
- 5.42 Biodiversity has been fully addressed in the preceding section, with further detail provided in the Biodiversity Metric Calculation and the Ecological Appraisal. Landscaping proposals are shown on drawing ref. 472/110 7, which provides a schedule of the proposed planting. Detail on sustainable drainage is provided within the Drainage Strategy. This demonstrates a proportionate approach, given the site constraints and small-scale nature of the development.

#### Trees

- 5.43 Local Plan Policy EE9 requires development to pay particular attention to trees considered to make a significant contribution to their surroundings individually or as a group.
- 5.44 Tree Survey and Impact Assessment and accompanying Tree Constraints Plan (ref. 2342-KC-AM-YTREE-TCP01RevO) prepared by Keen Associates provides an overview of the existing trees on and around the site and an assessment of the proposals. It identifies that the site is mostly devoid of trees, with some small saplings, none of which are of any particular merit. There are trees located in proximity to the site, however these are outside the application site boundary.
- <sup>5.45</sup> The proposed development will result in the loss of some saplings and the removal of areas of bushes (see Tree Protection Plan ref. 2342-KC-AM-YTREE-TPP01Revo). However, the proposed new landscaping will complement the existing retained vegetation and will more than compensate for any losses (see drawing ref. 472/110 7).
- 5.46 The Tree Protection Plan also provides detail on the protective measures that will be adhered to in order to protect all retained trees near to the site.

5.47 On the basis of the above, it is considered that the proposal complies with the requirements of Local Plan Policy EE9.

#### Transport

- 5.48 Government Guidance identifies that "Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe." (para 115)
- 5.49 Local Plan Policy SD3 states support for developments that integrate with sustainable travel networks. Policy SD4 states that the Council will support development proposals which maintain the safe operation of the highway network and which take account of the needs of all highway users for safe access, egress, and servicing arrangement.
- 5.50 The proposed development is merely refreshing an existing developed area of the Resort to improve its guest facilities. The development in itself will not result in an increase in visitor numbers but will help to ensure that visitor numbers do not decline. On this basis it is not anticipated that there will be any material change to traffic generation within the surrounding area.
- <sup>5.51</sup> The proposed development is small scale compared to other construction projects that have taken place at the site over the years. Thorpe Park has significant experience in managing construction sites to ensure that guest experiences are not compromised. Given the existing on-site storage and parking facilities there will be no adverse impact on the highway network as a result of the construction process. Local Plan Policies SD3 and SD4 are therefore met and there are no highways grounds to refuse the application.

### 6.0 Conclusion

- 6.1 This Planning Statement provides a detailed assessment of the proposed redevelopment of the existing artificial beach and pool area at the Thorpe Park Resort.
- 6.2 The existing site represents an underused area with ageing facilities in-need of investment and revitalisation. The proposals will bring new life to this area of the Thorpe Park Resort and promote a high-quality visitor experience. It has been demonstrated that the proposals are fully in accordance with national and local policy requirements. It is therefore requested that this application is approved without delay.

Birmingham 0121 713 1530 birmingham@lichfields.uk

Edinburgh 0131 285 0670 edinburgh@lichfields.uk

Manchester 0161 837 6130 manchester@lichfields.uk **Bristol** 0117 403 1980 bristol@lichfields.uk

Leeds 0113 397 1397 leeds@lichfields.uk

Newcastle 0I9I 26I 5685 newcastle@lichfields.uk Cardiff 029 2043 5880 cardiff@lichfields.uk

London 020 7837 4477 london@lichfields.uk

**Thames Valley** 0118 334 1920 thamesvalley@lichfields.uk

@LichfieldsUK

lichfields.uk