

Planning Policy Team
Runnymede Borough Council
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By email planningpolicy@runnymede.gov.uk

Date: 17 August 2020
Our ref: 04858/36/NT/HW/18697385v3
Your ref:

Dear Sir/Madam

Thorpe Neighbourhood Plan - Regulation 16 Consultation: Representations by Thorpe Park

On behalf of our client, Thorpe Park Resort, a company forming part of Merlin Attractions Operations Limited (Merlin), we set out below representations to the Thorpe Neighbourhood Plan Regulation 16 Consultation, issued for comment until 18 August 2020.

Thorpe Park Resort is a leading visitor attraction within the Borough and the South East of England. The Resort contributes significantly to the local and regional economy and is one of the largest employment providers in Runnymede. The attraction has been greatly affected by the Current Covid-19 situation and has been closed for a number of months, but positively was able to open in July at a reduced capacity in line with Government guidelines. Like many businesses in the area it will have key challenges moving forward but will aim to continue to work with the borough and Thorpe neighbourhood to continue to realise the benefits that Thorpe Park Resort brings.

Two of Thorpe Parks employees were members of the Thorpe Neighbourhood Forum when it was established, but there have been a number of personnel changes at Thorpe Park Resort over the last year or so and it appears that when these representatives left Thorpe Park involvement in the forum by Thorpe Park representatives was not continued. Helen Bull, the new Divisional Director has re-engaged with the Neighbourhood Forum and local Councillors and will ensure that moving forward Thorpe Park is fully involved in the Neighbourhood Forum.

Representations

Community Facilities

Draft Policy TH9: 'Community Facilities' lists a number of proposed Community Facilities. It is proposed that the following sites owned by Merlin are included within the list:

- iii. Thorpe Park Resort, Staines Road, Chertsey, KT16 8PN
- viii. Thorpe Nursery Pre-school, Manor Farm, Thorpe, Egham, TW20 8TE
- ix. Thorpe Lakes, Thorpe Road, Chertsey, KT16 8PH

The policy then continues to note:

“In addition to the provisions of relevant Local Plan policies, proposals to change the established use of a facility and its ancillary land must demonstrate that the land is no longer suited to any other D1 community use.

Proposals to change the use of part of a facility that is shown to be surplus to requirements will be supported, provided the change will not undermine the viability of the primary community use.

Proposals to extend a facility will be supported, provided they are consistent with the relevant policies of the development plan.”

The supporting text in the Neighborhood Plan notes that the draft policy is justified on the basis that it supplements emerging Policy of the Runnymede 2030 Local Plan (Policy SD7) by seeking to ensure that the long-term potential value of land in community use is not lost without good reason. As a minor observation we assume that the policy numbering of the adopted Local Plan has been amended during the review process and that the Neighbourhood Plan should refer Policy SD6 ‘Retention of Social & Community Infrastructure’ and not SD7 which relates to Sustainable Design. This can easily be picked up now that the Local Plan has been adopted and the policy references have been finalised.

Thorpe Park Resort agrees that as major operating visitor attraction it provides a number of benefits to tourism, the economy and the local community generally. This is acknowledged in the Local Plan at paragraphs 3.12 which confirms Thorpe Park as a tourist attraction that is an important part of the local economy.

However it is important to note that site is a theme park which operates under a D2 use class ‘assembly and leisure’. Its facilities are available for use to paying guests, but the Resort including its lakes does not provide social or community infrastructure (in the traditional sense). The theme park use (retention and enhancement) is however provided for through Local Plan policy IE4 ‘The Visitor Economy’.

Given the status of Thorpe Park as a major tourist attraction we are concerned that Thorpe Park is wrongly identified as a community facility and as drafted policy TH9 does not contribute to the achievement of sustainable development, nor is it in general conformity with the strategic policies contained in the development plan which are two of the conditions a Neighbourhood Plan must meet. References to Thorpe Park Resort, and Thorpe Lakes as community facilities should therefore be deleted.

Instead should the Neighbourhood Plan wish to provide support for the retention, improvement, enhancement and expansion of Thorpe Park and its lakes as a major tourist attraction this should be done through a separate policy in the Neighbourhood Plan supported by Local Plan policy IE4 ‘The Visitor Economy’ or Local Plan policy IE4 can be relied upon. Thorpe Park would be happy to discuss such a policy in more detail.

Thorpe Park Resort agrees to the identification of the Nursery Pre-school, as a community facility which provides community infrastructure/education and childcare which is protected by Policy SD6 ‘Retention of Social & Community Infrastructure’. Given the changes to the use class order from 1 September 2020 we assume the policy will reviewed to address the changes to the use classes.

Flooding

Para 2.13 notes *“The RBC Strategic Flood Risk Assessment of the emerging Local Plan (SFRA 2018) confirms Thorpe Park experiences flooding and is an important area of the Thames floodplain.”* Whilst it is acknowledge that Thorpe Park does experience flooding we consider in order to achieve sustainable development, that this section of the Neighbourhood Plan should note that Thorpe Park has an operational

flood compensation scheme that has been agreed with the Environment Agency which includes compensation areas that create flood storage in a flood event and that allows development to be compensated for in flooding terms. This is an important factor in the development of Thorpe Park. Further it should be clarified that the flood plan included at Page 13 is only a high level flood plan which doesn't reflect the Thorpe Park compensation areas and higher ground levels at the developed core which have been agreed with the Environment Agency. The Neighbourhood Plan should either note this is a general plan which is not accurate at a detailed site level or provide an updated plan showing the detailed levels which differential between zones 3a and 3b. Reference should also be made to the Thorpe Park compensation scheme. We'd be happy to provide a plan showing the approved compensation areas if this would assist.

Housing

Para 4.5 notes *"Following the Regulation 14 Stage it became apparent that land at Thorpe Park Farm (ID38) would not be available in the Plan Period and the land was omitted from further consideration"*

Thorpe Park did not appreciate there was a need to re-confirm the site continues to be available and viable as part of the Regulation 14 consultation, given we had already done so over the years via RBC and the SHLAA Call for Sites which is to cover the period to 2030 (noting the SHLAA supports the emerging Local Plan and its spatial development strategy for a minimum of 43 dwellings in Thorpe, with the SHLAA housing trajectory identifying Thorpe Farm as delivering 20 of those dwellings in 2026-28). Given this we were aware the site had also been positively identified in the draft Neighbourhood Plan and were pleased about this.

Thorpe Park Farm is listed in the SLAA (Council's Strategic Land Availability Assessment) and is included in Table 4 of the Local Plan which lists expected housing delivery 2015 to 2030. Thorpe Park is not a formal allocated site for delivery within the new Local Plan period, but falls within the "Housing from suitable SLAA sites including estate regeneration" section of the table. The potential housing capacity of these sites is then broken down in appendix B of the Local Plan. The potential housing capacity of Thorpe Farm is shown as 20 units.

We confirm that as noted in the SHLAA Thorpe Farm is available for development 2026-28 as previously confirmed to the Thorpe Neighbourhood Forum by Thorpe Park.

We note that the Local Plan will commence an early review next year to specifically address housing delivery as agreed with the Inspector. On this basis and to achieve sustainable development, we consider that the Thorpe Park Farm site should continue to be identified as a housing site. We also request that the early review of the Local Plan is referenced in the Neighbourhood Plan given the agreement with the Local Plan Inspector for such an early review and the need to provide additional housing in the borough. References to Thorpe Park Farm not being available for housing development should be deleted.

Ecology and Nature

Para 2.12 – refers to the wetland bird interest and ecology of the Thorpe Park No. 1 Gravel Pit SSSI. As a point of clarification we consider the Neighbourhood Plan should note that the enhancements have been achieved through the Ecology Management Plan that Thorpe Park agreed with Natural England and that Thorpe Park undertakes ecological maintenance to manage the benefits of the site as a habitat for wildlife. Thorpe Park agrees with the Neighbourhood Plan that public access should not be promoted.

The Neighbourhood Plan identifies a Green and Blue Infrastructure network in Policy TH7. The policy defines opportunities to enhance the network and requires all development proposals that lie within, or adjoin the network, to consider how they may improve it or contribute to its effectiveness, or at the very least not undermine its integrity. Thorpe Park agrees with this approach which is consistent with local and national policy. The Neighbourhood Plan also notes that there may be an opportunity to upgrade Monks

Walk and provide cycle access (para 5.54i). Thorpe Park supports sustainable travel and would support this proposal in principle assuming that there were no adverse impacts from a security and safety perspective on Thorpe Park's operations.

Green Belt

Para 5.9: notes that *“As a result of the Insetting [from the Green Belt] a number of land parcels identified in the RBC Strategic Land Availability Assessment 2018 (SLAA) will be released from the Green Belt including ID32 (Coltscroft), ID2 (Woodcock Hall Farm) and ID38 (Thorpe Park Farm) and their suitability for allocation has been considered along with other options.”* The removal of part of Thorpe Park Farm from the Green Belt has now been confirmed through the adoption of the Local Plan and this has been supported by Thorpe Park.

Please keep us updated on progress with the Neighbourhood Plan. We trust the above is clear but if you would like to discuss our representations in further detail please do not hesitate to contact me or my colleague, Sophie Hitchins.



Hannah Whitney
Planning Director

Copy Helen Bull (Thorpe Park)
 Neil Haskins (Merlin)