Runnymede Borough Council Local Plan Examination – Matter 10 Statement

Matter 10: Infrastructure Provision

Q.10.5. In the light of the other relevant policies and proposals in the Plan, does Policy EE13 provide a justified, effective framework for the minimisation of flood risk and support for strategic flood relief measures?

1.0 Draft policy EE13 is not sound or sufficiently precise and therefore does not provide a justified, effective framework for decision making. It must be amended in accordance with our representations of 22 February 2018 (as summarised below) and the accompanying Policy Map must be updated.

1.1 The final paragraph of draft Policy EE13 states:

“...The Council supports proposals for strategic flood relief measures (including any associated enabling works), including the proposed flood channel through Runnymede as part of the wider River Thames Scheme. The proposed route of the channel and the land adjacent to it, as shown on the Policies Map, will be safeguarded for this purpose”.

1.2 The emerging River Thames Scheme (RTS) flows through Thorpe Park’s lakes and we have therefore reviewed the Policies Map to determine the extent of the safeguarded route. This has raised three significant concerns which must be addressed before the Local Plan is adopted:

1.3 The draft policy refers to ‘safeguarded’ for the RTS but this is not sufficiently precise as there is no explanation of what the land/water is safeguarded from. Is this any development, or certain types of development, or simply that the land must be allowed to flood if necessary? This must be clarified under the policy.

2 There are fundamental errors in the line of the RTS route shown on the Policies Map. The area shown includes parcels of land which are developed as part of Thorpe Park’s theme park operations and they cannot be ‘safeguarded’ for the RTS. We have highlighted these on a plan at Appendix 1 as follows:

a Parcel 1: This piece of land comprises a rollercoaster, SAW – the Ride, which opened to the public in 2009. It cannot be ‘safeguarded’ for the RTS and is a critical part of the theme park operations.

b Parcel 2: This piece of land contains a themed building, comprising SAW Alive (an indoor maze) which opened to the public in 2010. It cannot be ‘safeguarded’ for the RTS and is a critical part of the theme park operations.

c Parcel 3: This piece of land is known as Area E and was created as part of the land extension work approved under the Medium Term Development Plan (MTDP) 2004 to
2010 (permission ref. RU.03/0965). The MTDP 2010 to 2016 (permission ref. RU.10/0579) approved a 50m rollercoaster either on Area E or Island A which is yet to be built. The land is currently being used for temporary overnight accommodation (the Shark Hotel, approved under permission ref. RU.13/0719). It cannot be ‘safeguarded’ for the RTS and is a critical part of the theme park operations.

d Parcel 4: This piece of land forms part of the hotel site. The extant planning permission, which has been lawfully implemented on site, includes some cutting back to the shoreline and this land appears to be within that zone.

e Parcel 5: This piece of land forms part of Thorpe Park’s Compensation Area 4a, where the land has been excavated to provide areas of flood storage to compensate for development of the Park. These areas are hydraulically connected to the floodplain at Thorpe Park and the scheme has been designed on a level-for-level basis in 100mm increments. It is therefore critical that any safeguarding of this land for the RTS has no effect on Thorpe Park’s use of this land for flood storage, compensating for development at the Park. If it does have an effect that this is unacceptable and the land must not be safeguarded for the RTS.

3 Draft Policy EE13 refers to safeguarding of ‘the proposed route of the channel and the land adjacent to it, as shown on the Policies Map’. The drafting of this policy is not sound and requires critical amendment. The Policies Map should show the safeguarded route and any reference to ‘land adjacent to it’ must be removed. This is not precise and provides no indication of the extent of this land (or what it should be safeguarded from, as noted under point 1 above). There must be no restriction to development on land adjacent to the route of the RTS (once amended as set out under point 2 above), nor any restriction on Thorpe Park’s ability to develop its lake-edges. This is critical to the Park’s future operations, and any restriction would significantly and adversely affect this high-profile leisure/tourism attraction with associated impacts on the Borough’s economy and local employment.

1.4 On the basis of the above it is critical to the soundness of the Local Plan that:

1 The wording of the policy is made more precise to clarify what is meant by ‘safeguarding’ along the RTS route;

2 The extent of the ‘RTS Flood Diversion Channel Two – Policy: EE13’ shown on the draft Policies Map is revised to exclude the areas of Thorpe Park’s land as set out under points above; and

3 The wording of Policy EE13 is amended to state: “The proposed route of the channel and the land adjacent to it, as shown on the Policies Map, will be safeguarded for this purpose”.

1.5 Given the significance of our concerns in relation to draft Policy EE13, we do not consider this is a justified or effective approach. We are concerned about whether the safeguarding could cause ‘blight’. This is being investigated and we therefore request to participate in the oral part of the Examination in relation to Matter 10 on 20th February 2019.
Appendix 1

Areas to be Excluded from the River Thames Scheme
‘Safeguarded’ Route

Key

Areas to be excluded from River Thames Scheme Extent
1. SAW The Ride
2. SAW: Alive
3. Shark Hotel
4. Permanent Hotel
5. Part of Compensation Area 4

River Thames Scheme
Flood Diversion Channel Two
(as Shown on Policies Map)