

KNOLL HOUSE HOTEL, STUDLAND, SWANAGE, DORSET, BH19 3AH
Rebuttal of AONB Team and Landscape Officer's comments
1st December 2023

Richard Sneesby Landscape Architects have been asked by Black Box Planning to prepare a rebuttal to comments made by Dorset's AONB Team and Dorset Council's Landscape Officer in response to the Landscape and Visual Impact Assessment carried out by Richard Sneesby Landscape Architects (hereafter referred to as the LVIA) to support the proposed development at Knoll House Hotel, Studland, Dorset. Further comments have been received following officers' review of the Landscape Strategy masterplan. Comments on both the findings of the LVIA and the illustrated approach to landscape design illustrated in the landscape masterplan are addressed in this document.

The LVIA has provided a detailed and comprehensive appraisal of the landscape and visual effects associated with the proposed development. The LVIA does not shy away from the changes to the site resulting from substantial changes through the replacement of an existing collection of buildings in a new architectural style. Indeed the LVIA goes to great length to describe the real and perceived effects of the proposal upon the surrounding area and the introduction of a more contemporary approach to new buildings by reference to scale, size, materiality and through comparisons with similar more recent developments in the locality.

The proposed development is in stark contrast to the previous application (Ref: 6/2018/0566). Feedback and criticism of the earlier application has informed the new proposals and an iterative design approach to primary mitigation through careful and thoughtful site planning and architecture.

Request for mathematically correct printed views

The Landscape Officer has requested mathematically correct images which can be printed at A3 which show the changes as close as possible to a human eye view when held at arm's length.

The wider panoramic images provided within the LVIA were a conscious decision, despite their variance from the recommendations within the Landscape Institute's Technical Guidance Note TGN 06/19 (3.8.4). This is an unusual site location. The hotel is fully screened from the north and west by mature woodland. Close views are found from Ferry Road and from footpaths and a small number of residential properties to the south. From these locations the changes will be most apparent and have been modelled and illustrated through photomontage views to give a clear and honest illustration of the visual effect of the development following construction. These views are the most important ones which illustrate the primary mitigation achieved through the architectural strategy, massing principles and detailing.

Most visual receptors will have a view of the proposed development from higher ground to the south the closest of which is 755m from the site boundary and with the majority, on Ballard Down, over 2Km distant. From these viewpoints the view reads as a wide open landscape with panoramic views beyond 25Km on a clear day (as illustrated in the LVIA). The use of the wider panorama views not only illustrates the effect of any visual change to the site itself, but also how this change might be

noticed within these wide panoramic views. At site visits, and during the field work stages, Knoll House was often difficult to find in the wider view without verification using magnification.

The representative views included in the LVIA and submitted separately as high resolution images for review can be viewed on screen at high magnification, as if looking at the site from the landscape through binoculars. Whilst this does not provide a human eye view, it does provide the opportunity to interrogate the proposals in great detail and is intended to allow consultees an opportunity to visually assess the proposals in great detail. It is certainly not in the intention to include wider panoramic images to minimise the effect of the proposals when reviewing the LVIA images.

In response to the request for mathematically correct views, 5 Viewpoint photographs are provided which have been generated in accordance with the Landscape Institute's Technical Guidance Note TGN 06/19 (3.8.4).

3.8 Viewing Distance and Image Enlargement

3.8.1 Table 2 introduces the concept of 'image enlargement', which is carried forward into the detail of Visualisation Types 3-4, described in the next section.

'Monocular' and 'Binocular' viewing

3.8.2 Printed photographic images have a theoretical viewing distance at which the scale of the view is reconstructed, although this assumes that cameras and humans have similar optical systems, which they do not. The essential difference is that cameras (for this purpose) are monocular, and humans are generally binocular. In addition, the fact that reality is viewed as a 3D space, whereas photographs are viewed as 2D projections, combine to alter perceptions of 'scale' and 'depth' between reality and photography. See Section 5 'Further Reading' for more information.

3.8.3 Whilst mathematical viewing distances have historically been quoted alongside visualisations, it is generally regarded that viewing distances of between 500mm – 550mm (approximately arm's length) are the most practical and widely used. All scale-representative views should, therefore, be accompanied by a note: "To be viewed at comfortable arm's length".

100% Reference Image

3.8.4 A 'mathematically correct' image is established for a 50mm FL approximately 39.6 Horizontal Field of View (HFOV) image, printed at a size of 390mm x 260mm on an A3 sheet, and held at 542mm¹ from the eye. This 'monocular view' represents a reference point of 100% in this guidance note, against which enlargements, such as

¹ Note that 542mm simply establishes a mathematical reference point. Generally, there is no need to hold the image at such a specific distance.

150%, can be described. For example, a 50% increase in image size can be described as a 150% enlargement.

3.8.5 Changes in the relative size of printed images are described in other documents as the 'Effective Focal Length' (EFL) at which an image is presented. 50mm EFL equates to 100% and 75mm EFL equates to 150%. For simplicity, this guidance describes the enlargement by percentage, related to the 100% reference image.

150% Enlargement Factor

3.8.6 Whilst presenting a 50mm FL image (39.6° HFOV) at A3 size is a straightforward use of the camera image, this approach has been found to be lacking in respect of expansive projects in open landscapes or seascapes, such as windfarms. This is because, for a 50mm FL image printed at A3 and held at comfortable arm's length, the scale of the viewed image is smaller than reality.

3.8.7 As a result of research in Scotland over the last decade (see Section 5 - Further Reading) there is a consensus that increasing the printed image size by 150% (as if a 75mm FL lens had been used) provides a better impression of scale for most viewers using two eyes (binocular vision). This is particularly appropriate for projects such as windfarms, whether viewed on a desktop or on site.

3.8.8 The approach of this guidance is, therefore, to recognise that, for larger-scale projects with more distant components such as windfarms, the approach taken in SNH 2017 (put simply, a 150% enlargement) is appropriate.

3.8.9 This brings with it some issues:

- a) Paper size or constrained Field of View

Adding 50% to the image size increases the presentation size (digital or paper). Conversely, the site can only be represented

It is critical to recognise that, while these printed views provide accurate evidence of the change when printed and views at A3 size, they do not properly illustrate the wider context experienced by the visual receptor at each viewpoint.

In-house methodology:

- Set up an A3 document in InDesign
- Place 390x260mm frames onto InDesign sheet
- Place existing situation photograph into frame and resize to suit frame extents (no using of any Free Transform tool) - photos supplied by author of the LVIA and from previous reporting. These are taken with a full frame DSLR (Canon 6D MkII) and fixed 50mm prime lens.
- Copy and paste in place the existing situation photograph to next sheet to ensure same frame dimensions and placement on the sheet itself.
- Relink image to replace Existing Situation photograph with Proposed Photomontage View - photomontage supplied by the project architects.
- Repeat steps for each viewpoint

Visual Assessment conclusions from the LVIA

The table below is an abbreviated summary of the outcomes reported in the LVIA.

Viewpoint (Baseline panorama or photograph)	Location	Distance to development (nearest point) from receptor viewpoint (m)	Visual assessment Operational phase day and night	Significance of Residual Effects
1	Eastern road verge of Ferry Road, adjacent to site entrance to Knoll House Hotel SZ 03173 83268	15m	Receptor sensitivity: Low Magnitude: Moderate Significance category: Slight (slightly adverse)	Significance category: Slight (Not adverse)
2a	Bridleway SE22/38, south of Knoll House Hotel SZ 03155 83100	105m	Receptor sensitivity: High Magnitude: Moderate to Large Significance category: Moderate to Large (slightly adverse Year 1)	Significance category: Moderate to Large (Beneficial)

2b	Entrance to Wadmore Lane SZ 03251 82897	335m	Receptor sensitivity: High Magnitude: Moderate to Large Significance category: Moderate to Large (slightly adverse Year 1)	Significance category: Moderate to Large (Beneficial)
2c	Bridleway SE22/38, south-west of Knoll House Hotel SZ 03084 83104	83m	Receptor sensitivity: High Magnitude: Moderate to Large Significance category: Moderate to Large (slightly adverse Year 1)	Significance category: Moderate to Large (Beneficial)
3	Bridleway SE22/23, west of Knoll House Hotel SZ 02618 83186	538m	Receptor sensitivity: High Magnitude: Negligible Significance category: Slight (Not adverse)	Significance category: Slight (Not adverse)
4	View from Addlestone Rock: Bridleway SE22/24, south-west of Knoll House Hotel SZ 02618 83186	755m	Receptor sensitivity: High Magnitude: Minor to Negligible Significance category: Slight (Not adverse)	Receptor sensitivity: High Magnitude: Minor to Negligible Significance category: Slight (Not adverse)

5b	Black Down Mound. Footpath SE22/17 south-west of Knoll House Hotel SZ 02527 82482	800m	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)
6	View from Bridleway SE22/24, high point above Addlestone Rock south-west of Knoll House Hotel SZ 02182 82619	887m	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)
7b	View from Bridleway SE22/12 Studland Hill SZ 04386 81347	2268m	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)
7c	Ballard Down Bridleway SE3/6 SZ 03347 81303	2008m	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)

8	South West Coast Path, Old Harry Rocks, Handfast Point – Bridleway SE22/9 SZ 05433 82469	2400m	Receptor sensitivity: High Magnitude: Minor to Negligible Significance category: Slight (Not adverse)	Receptor sensitivity: High Magnitude: Minor to Negligible Significance category: Slight (Not adverse)
9 and 10	Near the obelisk western end of Ballard Down SE22/14 SZ 02525 81253	2024m	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)	Receptor sensitivity: High Magnitude: Moderate Significance category: Moderate to Large (Beneficial)
11b	Sand dunes west of litter bins on Knoll Beach, adjacent to Footpath SE22/1, part of the SW Coast Path SZ 03504 84336	1000m	Receptor sensitivity: High Magnitude: Negligible Significance category: Slight (Not adverse)	Significance category: Slight (Not adverse)

Visual effects reported in the LVIA and further work since

14 viewpoints are assessed in the LVIA. At Year 1 the LVIA concluded that the effect upon visual receptors is summarised as:

Moderate to Large (Slightly adverse)	VP 2a, VP2b, VP2c
Slight (slightly adverse)	VP1
Slight (not adverse)	VP3, VP4, VP8, VP11
Moderate to Large (beneficial)	VP5b, VP6, VP7b, VP7c, VP9, VP10

Since the LVIA was submitted a further interrogation of the view from the beach east of Studland Heath, which includes a section of the South-West Coast Path, was jointly considered by the application team and the LPA and which concluded that Knoll House cannot be seen from this location.

Officer's concerns about under-reporting

The LVIA includes detailed consideration of the effect of the proposal upon visual receptors from all reported viewpoints and a developed narrative which considered the change from one style of architecture to another and the scale and massing of the proposal. The majority of this area of reporting is contained in Sections 6.142 – 6.178 of the Environmental Statement (ES).

From the wider landscape (viewpoints beyond 775m from the site boundary which covers all viewpoints except VP1, VP 2a, VP2b and VP2c) the change to views experienced by visual receptors are all assessed as either slight (not adverse) or moderate to large (beneficial). The LVIA describes the effect at each viewpoint recognising that the change will be apparent, but at such distance to be only a slight change to the view. Where the assessment concludes that the effect will be beneficial the LVIA describes how the proposed building will appear to be more visually recessive in the landscape compared with the baseline situation.

In order to assess the effect of the proposal upon visual receptors and landscape character, inevitably the LVIA favoured views of Knoll House where it is visible. In reality the buildings are not seen or very hard to find from the surrounding countryside. The viewpoints included, while representative of the effect upon visual receptors from selected locations (from where it can be seen), are not representative of the visibility of Knoll House from the surrounding area (from where it can't be seen). In this way the LVIA skews the assessment to being over-reported rather than under-reported compared to the reality of any visual change experienced from the surrounding area.

Landscape Strategy

The following feedback has been received from the AONB Unit (*in italics*). Responses below:

"The landscape strategy shows green roofs in areas where the roof plan for the overall site suggests a green roof will not be used. This remains a point of clarification".

Response: The extent of green roofs has been clarified by AWW in the design response. The Landscape Strategy Plan is correct.

"The strategy does not appear to include details of the proposed green walls included in the design".

Response: The green walls will be achieved through the use of climbing plants, planted at ground level and trained using training wires.

"The strategy confirms an observation that the AONB Team previously offered concerning the majority of new planting being proposed between the villas and hotel complex and along the frontage to Ferry Road. It should be noted that the courtyard parking is enclosed by relatively tall structure and whilst this may offer amenity to the users of the site, the planting would not serve to substantively reduce the massing of the buildings when seen from the surrounding landscape.

Overall, reductions to the scale/massing of the buildings are recommended, alongside redistribution of planting so as to better enclose and intersperse the structures”.

Response: The AONB Team make repeated comments about the size of the buildings when viewed from Ferry Road and the footpath network and residential houses south of the site within 540m from the site boundary. The consultee response finds the resulting visual effect harmful to the AONB designation. We take this to mean that the AONB Team would prefer the buildings to be screened, or perhaps ideally hidden, by new planting as a form of camouflage mitigation. The imperative to minimise harm to the landscape is at the heart of the proposal, learning lessons from the previous application, and using a landscape-led approach to a new design for the site. The resulting buildings, when compared to both the baseline condition and the previous application, are a robust set of primary mitigation measures designed to minimise any adverse effects upon the landscape and visual receptors.

From viewpoints beyond 775m, all on high ground, the hotel sits with a backdrop of woodland. The existing building is apparent (albeit at distance) where it reads as a cluster of white forms with red roofs and a dominant southern elevation. In contrast the proposal favours visually recessive materials and colours, green roofs and an open landscaped courtyard so that the buildings are much less visible than the baseline condition. This has led to the LVIA assessing the residual visual effects as beneficial when compared to the baseline condition.

It is not the design intention to screen the proposed building from Ferry Road. Rather to develop the tree cover which filters views towards the buildings and to add to the existing shrub associations at ground level in a similar way to the existing condition, maintaining views from the hotel towards the east. The planting is located alongside Ferry Road and close to the buildings with a swathe of mown grass under the existing and proposed pine trees. This will provide low-level visual privacy (at walking, cycling and car eye level) between the road users and the ground floor rooms while extending the grass/pine condition that exists currently.

“There is a paucity of planting in in the southern extent of the site, where the two-storey villas, car park and spa are located. The refused application for this site identified the southern boundary as a priority for new planting, whereas the latest plans appear to give limited priority to this area”.

Response: The criticism of the refused scheme related to the scale of the buildings on the southern boundary of the site and the use of secondary mitigation, in favour of primary mitigation, as a means to assimilate this boundary. This revised proposal uses primary mitigation in the form of the building design which, aside from the fundamental change in architecture to reduce scale and mass, relocates built development further from the southern boundary (refused scheme Block B1 was located adjacent to the southern boundary and Block B2 within 9m, the current proposal now proposed a reduced scale accommodation 25m from the southern boundary with planting incorporated). The Spa has also been designed as primary mitigation, as a single storey building with a green roof and drop eaves to meet the ground. The submitted photomontages show the positive effect this will have in views from the south.

The primary mitigation approach negates the need for screen planting. The parking area is substantially screened, including a landscaped bank to the base of the stone wall, by shrubs and taller pine trees with the exception of a length of boundary between the planting area shown on the drawing and the Spa. This short length, where the stair core to access the below ground parking abuts the site boundary, will be addressed through boundary walling with car parking set back from the boundary.

“Concerning the frontage to Ferry Road, the plan appears to show that the approach will be to largely retain existing trees to the north of the access, with ribbons of ornamental shrub and herbaceous planting bordering the highway and the buildings. For the most part, this approach is similar to the existing position to the fore of the existing hotel building. The plans also show an area of new advanced stock conifer planting to the fore of the apartments. Furthermore, curtilage planting of ornamental shrub and herbaceous species are shown close to the spa building and between the access road and restaurant. Again, this is not a significant departure in terms of the quantum of landscaping, as compared with the existing position. However, as noted in my earlier response, the impact of the frontage to Ferry Road appears to be quite substantially increased and would appear unlikely fully mitigated by the proposed planting. Consequently, I remain of the opinion that further primary mitigation is required”.

Response: A response to these issues is set out in the DAS Addendum, in justifying the approach to the building frontage along Ferry Road. The proposal adopts a contemporary approach to architectural design, which has been supported by the LPA's Conservation and Design Officer (refer Conservation and Design Officer's response dated 19.12.22). The proposal has considered the existing building line and scale along the Ferry Road frontage (see DAS Addendum p4 – 7). Whilst the proposal adopts a more consistent approach to architectural form rather than the current organic evolution of architecture which are considered by officers to be of no architectural merit, it is recognised as a change in the existing character. However, it is unclear why such a change in character, given the existing poor quality of building stock is harmful in landscape terms and, whilst the landscape proposals do introduce some further substantial planting to filter views, including the use of large nursery stock pines, why further mitigation is required.

Report ends