

## **P/FUL/2022/06840 - Knoll House Hotel, amended application.**

**Landscape strategy plan** - It is noted that a landscape strategy plan has been submitted. For a development of this size and impact I suggest that the plan is insufficient to demonstrate that the proposal will sit comfortably within the situation. This is largely due to the visual impact, on the wider public amenities, of the proposal's scale & form.

The plan includes reference to conifers.

Green roof - An assessment of the prevailing environmental conditions expected on the green roofs must be undertaken such as the prevailing wind direction and strength, average rainfall and shading to determine the vegetation suitable for the roof. Biodiverse roofs will often have a period of browning off during dry spells in the summer and therefore it is important to manage client expectations and determine the requirement for an aesthetic green roof versus a biodiverse roof. There are seasonal constraints when establishing vegetation on a green roof and therefore adequate planning is essential (see section on establishing vegetation below).

### **MAINTENANCE**

Contrary to popular belief biodiverse roofs do require periodic maintenance throughout the lifecycle of the roof. The key maintenance period is up to 3 months after planting during the initial 'establishment period'. Irrigation is particularly important in the first 10 weeks during dry periods.

On roofs over 500m<sup>2</sup> an automated sprinkler or leaky pipe system should be considered to maintain plant health. For plug plants irrigation is required every 2-3 days to once a week during the establishment period but wildflower blankets require daily irrigation during dry spells. Green roofs are very nutrient poor environments and therefore the use of a slow-release fertilizer to plant establishment (we can advise on fertilizer makeup and application rates). After initial establishment further fertilization and watering should NOT be required but should be assessed by the maintenance contractor. Ongoing maintenance on biodiverse roofs should include at least two annual visits by a suitably qualified specialist green roof maintenance contractor. The tasks required in annual maintenance can include: Inspection of vegetation and reporting any problems on plant establishment Removal of unwanted weeds such as Buddleja, Canadian fleabane, sow-thistles and docks Clearance of drainage pits and vegetation barriers around perimeter Old seeds heads should be left to overwinter to provide foraging potential for birds and overwintering sites for invertebrates. Cutting of wildflower turf and removal of this vegetation may be required on turfed roofs or those with more vigorous grass growth Invertebrate/wildlife may be a requirement.

Overall, despite the explanation provided within the addendum, the images appear to lack the usual information on the sheets that would enable better understanding of the images, including the required viewing distances for the sheet size.

Concerning the amendment to the apartments situated at the north of the site, from 4 storeys to 3 storeys, this is noted to result in only marginal improvements to the overall impact of the redevelopment. Although the AONB Team's advice included a recommendation to make this change, there were also numerous other amendments suggested, including the reduction in the height of the proposed 3 storey villas, which are located in the most elevated part of the site.

light spill , extensive glazing . We believe that a more extensive redesign is justified, focussing on primary mitigation. Key areas of outstanding concern include:

- The proposed frontage to Ferry Road continues to be too impactful, particularly due to the extensive glazing and some aspects of the architecture that are considered somewhat unsympathetic to the wider rural setting. As previously noted, reviewing designs for the restaurant, spa and hotel is recommended. The amended plans remain to be both too overtly modern in architectural design and favour materials such as extensive glazing. Further use of 'softer' building materials and more green architecture along the frontage to Ferry Road would be considered more sympathetic. Concerning the southern 'wing' of the hotel building, which is understood to contain a bar and restaurant, the scale of this appears to closely resemble the earlier plans. This is a relatively conspicuous element of the development, being at the gateway to the site, and is seen alongside the novel architecture proposed for the nearby spa building (which the AONB Team previously recommended was fundamentally amended, but remains largely unaltered). As noted previously, reducing the scale of these structures and removing wider features such as external terraces, glazed balustrades and glazed links to the hotel could be pursued in combination with a greater application of 'softer' features, such as green wall/roofs, timber cladding, etc.
- There are aspects of the development that are still considered to be too tall, particularly the 3-storey villas to the west of the hotel.
- too dominant and bold
- In addition to amending the height of the crescent terrace of villas, and distributing the villas in a more diffuse layout, it is considered that the visual impact of these could be further mitigated were some of the pitched sections of zinc standing seam amended to be green roofs, e.g. the leading pitches at the southern/western edges of the rearranged layout of villas and also the terrace of two-storey villas. Furthermore, depending on the positioning of the rearranged group of villas, there may be merit in using some green walls within those elevations that will be visible from the south and west.
- The development also includes numerous PV panels, particularly on top of pitched sections of the villa roofs and on the roof of the apartment building. There may be opportunities for some of the standing seam roofing to utilise an integrated PV system, rather than roof mounted panels. It is our understanding that flexible PV strips are available, which can be used on metal roofs as an alternative to mounted panels.
- Built development continues to push toward the edges of the site, with the majority of new planting seemingly being proposed between the villas and hotel complex and along the frontage to Ferry Road. We await further details in the form of a landscape strategy. However, as the fundamental layout of the site is unaltered by the amendments, our earlier observations concerning the distribution of landscaping are likely to be of ongoing relevance.

it is for the applicant to develop a scheme that delivers their ambitions for the site in a manner that is appropriate for this location. Unfortunately, the modifications that have been made to the original application are not considered to have altered the foreseeable impacts of the proposals to the degree that the AONB Team is able to support the redevelopment.

### **National Trust**

We note the applicant's commitment to preparing a revised Woodland Management Plan; however, the management of the woodland is very important for landscape and ecological reasons, and given

this importance, we consider this should be part of the planning application for consultees to review, and not considered after (and by condition) if the application is approved

### **Snr Landscape Helen Lilley**

to comply with the requirements of NPPF para 130 and LP Policies D and LHH further changes are required as detailed by the Dorset AONB team. Rainwater harvesting and micro-SuDS including rain gardens should also be considered, and the Landscape Masterplan identified in the addendum to the LVIA needs to be submitted.

The amendments are welcomed; however the proposal will still represent significant change in one of the most sensitive landscapes nationally. I share the concerns of the Dorset AONB team about the scale form and massing of the buildings/visual impact of the development, particularly in relation to:

- The scale and form of the 3 storey villas and hotel. • Presentation to Ferry Road. • The amount of glazing and rooflights proposed (in relation to reflectivity and light pollution).
- The location of solar panels on the roof of the northwestern portion of the hotel building. The addendum to the LVIA states that a detailed landscape masterplan has been submitted, however I can't find this on MasterGov or the website. Any planting proposed would however represent secondary mitigation only and is unlikely to overcome the above concerns. On this basis, I am not able to support the application as I do not consider that the proposals adequately comply with the requirements of Policies D and LHH of the Purbeck Local Plan.

The following changes recommended by the AONB team would however overcome any standing objection:

- A softer approach to the design of the hotel, and further reduction in the amount of glazing, especially along the Ferry Road frontage.
- Breaking down the massing and scale of the 3 storey villas to achieve a more diffuse arrangement.
- A reduction of the amount of rooflights/glazed roofing.
- The use of 'green wall' construction and additional timber cladding and green roofs
- Consideration of alternatives to roof mounted solar panels.

I also note that although some surface water will be intercepted by the green roofs, most will be piped into the existing surface water drainage system. This should be reviewed, with rainwater

harvesting and micro-SuDS including rain gardens being considered.

### **Policy consideration**

NPPF 2021 (revised September 2023)

The site is in the Dorset AONB and forms a part of the setting of the Heritage Coast. Heritage Coasts are protected by the planning system with paragraph 174 of the National Planning Policy Framework indicating a requirement to 'maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as heritage coast, and improve

public access to and enjoyment of the coast' (NB para 178 is not triggered in this case as the Heritage Coast forms part of the AONB). Provision for AONBs is included in NPPF paragraph 176, which indicates that 'Great weight should be given to conserving and enhancing landscape and scenic beauty in National Parks, the Broads and Areas of Outstanding Natural Beauty which have the highest status of protection in relation to these issues' and 'the scale and extent of development within all these designated areas should be limited, while development within their setting should be sensitively located and designed to avoid or minimise adverse impacts on the designated areas'.

In addition to this, parts b) and c) of paragraph 130 require development to be:

- visually attractive as a result of good architecture, layout and appropriate and effective landscaping, and
- sympathetic to local character and history, including the surrounding built environment and landscape setting.

Purbeck Local Plan Part 1 2012

Policy D requires proposals for all development and other works to:

- Positively integrate with their surroundings;
- Reflect the diverse but localised traditions of building material usage found across the District;
- Avoid and mitigate effects of overshadowing, overlooking and other adverse impacts including light pollution from artificial light on local amenity;
- Demonstrate support for biodiversity through sensitive landscaping and through in-built features, which provide nesting and roosting facilities for bats and birds;<sup>4</sup>

(continues.....)

Policy LHH requires development 'to conserve the appearance, setting, character, interest, integrity, health and vitality of landscape (including trees and hedgerows) and heritage assets - be these locally, nationally or internationally designated or otherwise formally identified by the Local Planning Authority' and to 'deliver enhancement and improved conservation of those assets'.

Other material considerations

The Dorset AONB Management Plan 2019-2024 contains policies which are intended to protect and enhance the landscapes of the AONB. The following policies are relevant to the proposal.

- Policy C2 a: Proposals affecting the AONB will be assessed to a high standard.
- Policy C2b: Landscape and seascape character assessment will be used to consider the effects of proposals on the character and appearance of the AONB.

- Policy C2 d: The key test of a proposal against the statutory purpose of the AONB will be its ability to demonstrate that the proposed change would conserve and enhance landscape and scenic beauty.
- Policy C2e: The conservation and enhancement of the AONB's special qualities will be a significant consideration in the planning balance.
- Policy C2f: Proposals that are harmful to the character and appearance of the area will not be permitted unless there are benefits that clearly outweigh the significant protection afforded to the conservation and enhancement of the AONB. Where impacts cannot be mitigated, planning gain and compensatory measures will be considered.
- Policy C4c: Protect and where possible enhance the quality of views into, within and out of the AONB.

The Landscape Character Assessment for the Dorset AONB forms a part of the AONB Management Plan. It indicates that the site forms a part of the Corfe Clay Valley Landscape Character Area (LCA), and includes the following Planning Guidelines which are relevant to this proposal:

- Encourage the use of native planting in any landscape scheme associated with new development and consider removal of unsympathetic species, such as the Leylandii screening hedges that stand out in the landscape.
- Avoid unnecessary and prolonged noise and light pollution. Require good design to limit the impacts and use appropriate planning conditions to secure ongoing control. The Purbeck District Design Guide SPD 2014 provides guidance on the design of new development. In relation to scale, mass and form it highlights the importance of maintaining a harmonious relationship with neighbouring buildings, spaces and streets. It also indicates that rainwater harvesting/SuDS should be considered in preference to direct connection to piped drainage systems.

### **Natural England**

Woodland Management Plan: this plan requires updating in accordance with the comments of the land owner, the National Trust (NT). The authority should require a planning condition to ensure this is secured prior to any commencement. The use of the land for private helicopters should be restricted through a suitably legally binding agreement eg S106 which will need to include the land owner (NT).

Natural England remains concerned that, whilst elements of the new design proposal are welcomed as a moderation (the green roofs in particular) the scale and massing of the buildings proposed, the modern design proposed does not fit with the rural character of either the AONB landscape or locally that of the village. In particular there is a very significant level of glazing which is both visually inappropriate in proportion to the existing building but also likely to lead to a wider visual impact due to reflections.

It is a concern that the use of cladding such as zinc will create wider visual impacts as is seen at the visually intrusive roofing at the Purbeck Golf Club.

The current buildings rely on screening from surrounding woodland which is nearing its effective life span and ageing trees are likely to result in a period where the development becomes increasingly visually intrusive from the west and south as well as northern views. The Woodland Management plan requires updating to secure a long term and appropriately maintained feature, for example the phasing out of locally non-native species such as a pine.

The AONB Team have provided detailed advice concerning the buildings proposed and their impacts, these are supported by Natural England, in particular the reduction in glazing and favouring the use of local more muted materials such as stonework. Natural England concur with the need to break up the visually dominating blocks proposed, either through design or physical separation.

Given the reliance on the screening of the aging woodland around the application site and the prominent feature on which the site sits, Natural England is concerned that the height of villas on the top of the Knoll site should be reduced to 2 storeys and the apartments kept at a height of not more than 3 storeys with the western villas at 2 storeys. The long term effect of moving from a pine dominated woodland to broadleaved woodland is a reduction in height of the screening vegetation as well as increased visual impacts in winter when leaves are lost.

Natural England would welcome the opportunity to work with the AONB Team and design advisors to more effectively moderate the proposal. Natural England advise that the applicant should be required (through a planning condition) to produce a lighting strategy to address the light pollution issue from overhead external lighting of the car park areas, access roads and internal foot paths. Lighting should be suitably directed downwards and cowled to minimise lateral light emissions visual intruding into the wider landscape. This should be secured through a planning condition prior to any commencement and it will need to address lighting of a suitable level and quality to meet the Bat Conservation Standards in sensitive locations identified by the applicants ecologist for both bats and foraging nightjar.

Natural England is not aware if the LVIA has adequately considered the effect of the screening woodland changing in structure and height. If this has not been considered the advice of the AONB Team should be sought concerning the need for a suitable period of compensation relating to ongoing visual impacts whilst the woodland is restored.

#### **Tree stock, numbers (taken from survey info)**

Arb Impact Assessment based on drawing provided by project architect.

Existing tree stock:

77 individual trees

11 groups

3 hedgerows

1 woodland

(1 category A; 58 category B; 33 category C)

Removal from direct impact of development:

Fell 29 individual trees (category B: 34,41-45,48,49,51-54, 61, 64, 72, 73 – 16 total. Category C: 33,46,48,62,65-68,70,71,74,77,83 – 13 total. G3, G4, G5, G6, G8, G9, G10 in part, G11, H1, H2).

Breach of RPA demolition stage 8 trees(T4, T6, T26, T40, T82, G1) at construction stage T40.

**TPO**

Area TPO includes T1 – T39 & G1. Two individual trees English Oak & sweet chestnut (T40 & T82 in survey = T1 & t2 respectively in TPO). TPO G1 group includes T73&T75 .