

From: [REDACTED]
Sent: 28 December 2023 10:03
To: Ursula Fay
Subject: RE: Planning application P/FUL/2022/06840

Dear Ursula,

Many thanks for consulting the Natural Environment Team on this application. Resources at the time of the consultation were such that we were unable to dedicate the necessary time to assessing this application however we have now had the opportunity to review the relevant supporting documents, namely the Environmental Statement Chapter 7 on Ecology and Appendix 7.1 on Biodiversity, both dated November 2022, the Ecology Solutions response dated July 2023 as well as any relevant plans.

The first point to note is that we have had not had any submission for this current application through the Dorset Biodiversity Appraisal Protocol. This is despite receiving a Biodiversity Plan for review in 2018 and 2019, for the previous application.

Detailed comments as follows:

Baseline

- Of concern is the lack of consideration of Nightjar, as an ecological receptor, in the discussion of the baseline conditions, despite these being a qualifying feature of the adjacent Dorset Heathlands SPA, and that the ecology chapter of the ES recognises that they were recorded 800m north of the site. Due to the absence of this species from the baseline we advise that **the effect of the development on Nightjar is not known.**
- **We concur with Natural England regarding the inaccuracy of the baseline habitat assessment.** The previous application at this site (6/2018/0566) was supported by an NVC survey of the habitats surrounding Knoll House Hotel which identified the grassland to the south of the hotel, including that immediately adjacent to the boundary of the hotel, as comprising dry acid grassland (U4b *Festuca ovina* - *Agrostis capillaris* - *Galium saxatile* grassland) and rush-pasture (M23 *Juncus effusus/acutiflorus* - *Galium palustre* rush-pasture). Figure 7.2 in the ES Appendix 7.1 for this application shows this grassland as being semi-improved, save for the areas within the red line boundary of the site which are assessed as being amenity grassland. However, there appears to be no justification for the grassland within the red line being amenity grassland and the grassland outside the red line being semi-improved as these form part of the same larger parcel of grassland outside of the hotel complex. On the basis of the 2019 NVC survey, a proportion of the 0.49ha of 'Modified grassland' in the site habitat baseline tab should have been inputted as g1a6 'Other lowland dry acid grassland' (the recommended translation of U4b NVC community to UKHabs). This is a very high distinctiveness habitat meaning the baseline value of the site would be higher, reducing the % gain. As such, we advise **that the 38.50% increase in habitat units, as described in ES Appendix 7.1, must be viewed with caution and, because of the uncertainty introduced by the inaccurate baseline, this should not be given substantial weight in decision making, as is requested in para 7.6.6 in Appendix 7.1 of the ES.**

Mitigation and enhancements

- Lowland dry acid grassland (which includes UKHab community g1a6 'Other lowland dry acid grassland') is a priority habitat/habitat of principle importance, which are a material consideration under national and local planning policy. Due to the absence of this habitat from the baseline, arising from the deviation from the previous NVC survey, we advise that **the potential effects of the development on lowland dry acid grassland priority habitat are unknown.** Protection of this area of grassland during construction is not described so it appears that at least temporary effects are likely.
- Generally speaking **much of the mitigation in Chapter 7 of the ES is not described in the level of detail sufficient to provide the authority with confidence that it is appropriate and achievable.** For example it refers, in 7.181 to 'dark corridors' to mitigate impacts on foraging and commuting bats however the nature of these dark corridors is not described, nor are their locations shown on any plans. The lighting mitigation described in this section, and construction phase mitigation for replied, are also too vague to be relied upon.

- In addition, much of the mitigation and enhancement measured described in the ES ecology chapter are off-site, within the 'wider study area', with no information given as to how this will be secured, or managed, long term. Due to this uncertainty **we advise that these measures, which include creation of heathland to the southeast, should not be relied upon for decision making.** Further, provision of a dog-walking area within the proposed heathland creation areas is inappropriate.
- **We concur with the request by Natural England for a lighting strategy to demonstrate that impacts on bats and Nightjar, from light spill onto nearby habitats, is adequately avoided or mitigated.**

Kind regards

Sam Williams
Lead Senior Ecologist
Place Services
Dorset Council



dorsetcouncil.gov.uk



From: Planning No Reply [REDACTED]
Sent: Monday, September 25, 2023 8:53 AM
To: Natural Environment Team <naturalenvironmentteam@dorsetcouncil.gov.uk>
Subject: Planning application P/FUL/2022/06840

Please see the attached correspondence relating to planning application P/FUL/2022/06840 Proposal: Redevelopment of existing hotel to provide new tourist accommodation including: 30 hotel bedrooms, apartment and villa accommodation and associated leisure and dining facilities. Location: Knoll House Hotel, Ferry Road, Studland, Swanage, BH19 3AH