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Our Ref: EA2/2018/0001

Your Ref:

Date: 18 May 2018

Ms Taya Cotterill
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Dear Ms Cotterill

Planning Application Number: EA2/2018/0001

Location: Knoll House Hotel, Ferry Road, Studland, Swanage, BH19 3AH

Description: EIA Scoping Opinion - Redevelopment of Knoll House to include the partial demolition of the existing hotel building & the erection of a new hotel extension to include 30 rooms, 38 apartments, 25 villas & ancillary leisure facilities & associated car parking, servicing & landscaping

Thank you for your request for a Scoping Opinion in respect of the above proposed development.

In accordance with this request, please treat this letter as the Council's Scoping Opinion under Part 4 regulation 15 of the Town and Country (Environmental Impact Assessment) Regulations 2017 with respect to the information to be supplied in an Environmental Statement.

The Planning Practice Guidance provides detailed advice on Environmental Impact Assessment at: <http://planningguidance.communities.gov.uk/blog/guidance/environmental-impact-assessment/>. This advises that there is no statutory provision as to the form of an Environmental Statement, but it must contain the information specified in Part 4 15(2) of the Regulations as well as such information in Schedule 4 that is reasonably required to assess the effects of the project. It may consist of one or more documents, but it must constitute a "single and accessible compilation of the relevant environmental information and the summary in non-technical language" (*Berkeley v SSETR [2000] 3 All ER 897, 908*).

The Planning Practice Guidance also says that whilst every Environmental Statement should provide a full factual description of the development, the emphasis of Schedule 4 is on the "main" or "significant" environmental effects to which a development is likely to give rise. The Environmental Statement should be proportionate and not be any longer than is necessary to assess properly those effects. Where, for example, only one environmental factor is likely to be significantly affected, the assessment should focus on that issue only. Impacts which have little or no significance for the particular development in question will need only very brief treatment to indicate that their possible relevance has been considered.

In this case the Council would therefore consider the scope of any submitted Environmental Statement should address the following main issues:

The principle of the proposed development in this location

Landscape and Visual Impact of the proposal on the character and visual amenity of the area

Impact on biodiversity and ecology

Traffic generation
Heritage Assets / Archaeology
Contamination
Socio-economic considerations

The above issues should be evaluated with respect to both construction and post-construction phases of the development.

In consideration of your request consultation has been undertaken with Natural England, Dorset AONB Team, Dorset County Council as Highway Authority and the District Environmental Health Land Contamination.

Dorset Area of Outstanding Natural Beauty (AONB)

The development is located within the AONB which is identified as being a sensitive area. It is also located within an areas defined as a Heritage Coast. The regulations establish that the more environmentally sensitive the site's location is, the more, the scale of the changes that are envisaged could lead to a significant alteration to the character and appearance of the site. This in turn could alter the character and appearance of a wider landscape. The site location and its context are highly sensitive, being surrounded by a landscape that is characterised as being both natural and undeveloped and is also of renowned scenic beauty.

The proposals provided illustrate widespread redevelopment across the site, with only a small proportion of the existing hotel development being identified for retention. The AONB Landscape Officer notes that the plans include proposals to introduce new planted areas between buildings. There are also plans to increase the vertical scale of buildings, particularly within the central, southern and western areas of the site. This would create new building lines toward the southern and western extents of the site. The result would foreseeably be a more readily perceived demarcation between the site and its landscape context. The visual impact of development within the site area would also foreseeably increase to a significant degree, due to the increased vertical scale of the various built elements and the probability of massing. He considers that the massing would appear harmful and not be overcome by the planting indicated on the plan, particularly considering views from the south, where the development would extend close to the site boundary. The proposal could result in significant effects on both local and more distant views.

The features of the AONB that contribute to its designation are its 'special qualities', which are detailed in the AONB's Management Plan:

1. Contrast and diversity – a microcosm of England's finest landscapes:
A collection of fine landscapes, striking sequences of beautiful countryside that are unique in Britain, uninterrupted panoramic views to appreciate the complex pattern and textures of the surrounding landscapes, numerous individual landmarks, tranquillity and remoteness, dark night skies, and undeveloped rural character
2. Wildlife of national and international significance
3. A living textbook and historical record of rural England: An exceptional undeveloped coastline, a rich historic and built heritage
4. A rich legacy of cultural associations

I consider that the proposed development would be likely to affect a number of special qualities of this highly sensitive part of Dorset AONB, particularly undeveloped rural character, uninterrupted panoramic views, dark night skies and tranquillity and remoteness.

The Environmental Statement (ES) should demonstrate an understanding of relevant AONB, including those contained within national policy, The Purbeck Local Plan and the Dorset AONB Management Plan 2014-19 The key aspects of these documents includes:

NPPF paragraph 114 states that: “Local authorities should... 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.

National Planning Policy Framework (NPPF) paragraph 115 states that: “Great weight should be given to conserving landscape and scenic beauty in...Areas of Outstanding Natural Beauty, which have the highest status of protection in relation to landscape and scenic beauty.”

NPPF paragraph 116 states that: “Planning permission should be refused for major developments in these designated areas except in exceptional circumstances and where it can be demonstrated they are in the public interest.”

Approach to Landscape and Visual Impact Assessment (LVIA)

Specific comments have been made by the AONB Landscape Officer. As he is engaged in ongoing discussion with the applicant’s landscape consultant regarding the scope of their assessment, his response to the request for a scoping opinion is largely based on discussions that have already occurred. The key aspects of the discussions undertaken regarding the scope of the LVIA are as follows:

- i) The LVIA will use a methodology that conforms to the 3rd edition of the Guidelines for Landscape & Visual Impact Assessment. I have been provided with a methodology by the landscape consultants and confirm that the approach is in line with the guidance.
- ii) The primary study area for the LVIA will be extend to 3km from the site. There may be some occasions where the assessment of effects extends to locations up to 5km from the site. Zone of theoretical visibility plans (ZTV) will be provided, showing both bare earth conditions and accounting for obstructions.
- iii) A range of viewpoint locations have been discussed and broadly agreed. There are some locations that are subject to further field investigations by the landscape consultants.
- iv) Agreed viewpoints will benefit from both panoramic and single frame images, taken in accordance with industry standards (50mm images using a full frame camera).
- v) Visualisations will be produced from a selection of the viewpoints, to illustrate the appearance of the new proposals. Final agreement on these locations will be reached in due course and there will be consideration of the presentation of these images using 75mm projected focal length.
- vi) Effects on the Heritage Coast (HC) will be incorporated into the wider assessment landscape & visual effects. In order to achieve this, it is advisable to show the HC on the maps of the wider area (and it may be useful to include this on the ZTVs).
- vii) Effects on the Jurassic Coast World Heritage (WHS) Site are foreseeably limited to the presentation and visitor experience of the site. These will be incorporated into the wider assessment landscape & visual effects. In order to achieve this, it is advisable to show the WHS on the maps of the wider area (and it may be useful to include this on the ZTVs).
- viii) As the effects on the AONB will be assessed in relation to the AONB’s Landscape Character Assessment (LCA), the LVIA would be expected to refer to this document.
- viv) As the effects on the AONB will be assessed in relation to the Special Qualities of the AONB and in relation to the objectives and policies of the AONB’s Management Plan, it is advisable for the LVIA to refer to these.

Natural England

Natural England have provided the following comments;

“Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England has visited the site and considered the likely environmental impacts. The whole site lies within 400m of designated internationally protected heathlands. It is considered highly unlikely that the applicant will be unable to show that the visitors do not access the adjacent designated sites. This raises a number of concerns relating to increased recreational impacts from changes to the operation of the facilities on the site and consequent intensity of use which will require evidence based and detailed consideration. For example the change in provision of a number of facilities, café, bar, restaurant, fitness and spa facilities which may act to draw in new users who in turn make use of the adjacent European sites for recreation. Increased on site capacity for visitors staying in the accommodation is also a concern which requires consideration as does the change in overall use patterns reflected in the move from a Hotel to a more mixed range of holiday occupancy.

The application must provide sufficient information to allow the various elements to be properly assessed so that the authority and Natural England can be certain of the outcome.

The above issues will require the following details to be provided:

- Information about the current operation of the hotel, staff occupancy, visitor occupancy rate per year, a breakdown of types of occupants (single, couples, families etc), activities current occupants may carry out (dog walking, cycling walking, beach visits etc) and other areas likely to be visited. These may best be ascertained by existing hotel records and a questionnaire approach to hotel visitors during the summer.
- Information about the types of users currently walking through the site, their destinations and activities derived from a visitor survey will be needed.
- Likely activity and duration of occupation of the residents in the proposed development, compared to the existing hotel facility. Apartments are not directly comparable to hotel accommodation.
- Proposals for enhancing access opportunities in the land holding to maximise its recreational use for residents should be explored as well as for diverting other users to set out any additional effects.

The applicant should consider the proposed use in relation to existing public access (routes around the woodland etc) and any requirements they may have to restrict/control this for operational reasons. In the instance of new fencing being proposed, there may be concerns about diverting pressure into the designated sites.

The assessment of existing and likely effects of recreational disturbance will provide critical information necessary to develop suitable avoidance/mitigation measures. To this end it will be important for the applicant to make the consultants fully aware of the land that falls within their control. This land should have sufficient biodiversity survey to enable the effects of any necessary mitigation measures to be assessed without further details.

The likely effects of recreation impacts on other nearby designated sites including the Dorset Heathlands, coastal SAC sites and Poole Harbour SPA / Ramsar should be considered. Some may be screened out. The authority is currently working with the Borough of Poole to develop a strategic mitigation SPD for the Harbour which will include Purbeck.

The effects of the proposal on current levels of vehicle use need to be considered through a transport assessment, this will need to consider air quality issues on the designated sites. There are concerns relating to access for emergency services to control wildfires on the nearby heathland.

The proposal may impact on the existing foul water facilities, by increasing demand, which is already giving a cause for concern, there is a possible solution to ameliorate excess flows by creating a number of small wetland features along the stream. This issue will need to be addressed with the service provider.

The applicant will need to demonstrate nitrogen neutrality in relation to Poole Harbour SPA / Ramsar.

The proposal is entirely within the Dorset AONB and there is likely to be a visual impact from nearby viewpoints. This will need careful consideration and an iterative approach to avoidance through adjusting the development configuration and moderation measures through a LVIA process. The LVIA will need to take account of the impacts and the need to modify proposals accordingly as well as time scales over which effects will last. It will be useful to consider the current benefits afforded by the mature trees around the hotel and the need to actively manage this woodland. The applicant is advised to consult with the local Dorset AONB Team. Natural England note that initial plans show the need to plant up areas currently semi-improved grassland. A survey of this resource will be required.

The site itself is known to support European protected species. However the current survey indicates that mitigation measures will be able to be developed through the BMP process. It is not known but is likely that the site also supports a range of other biodiversity features including priority BAP grassland, protected reptiles etc.

At this time Natural England is not able to advise the authority that the above proposal will not have a likely significant effect on the European and internationally protected sites.”

Trees

The proposal in the submitted plans shows the retention of trees on the site. In order to assist in the assimilation of the development into the site, an arboricultural method statement should be submitted to assess and protect the trees.

Dorset County Council as Highway Authority

The County Highway Authority consider that based on involvement so far in the pre-application process and meeting; the County Highway Authority considers that whilst a traffic assessment isn't needed within the EIA on the basis that the final version of the draft Transport Statement (provided to DCC on the 12/3/18) is submitted with the proposed planning application.

Heritage Assets / Archaeology

Designated and non-designated heritage assets would need to be fully considered and addressed through a Heritage Impact Assessment. This should include any historical significance of the existing building together with nearby listed structures and scheduled ancient monuments.

Land Contamination

The Council holds records of fuel tanks at that site. The potential for contaminated land cannot therefore be discounted and this matter would need to be addressed.

Employment / Tourism Impact

The proposal has the potential to provide significant investment to the District. A Local Economy Impact Assessment should be undertaken to quantify the benefits to the local economy including number of full time staff and equivalents, any additional purchasing in the local area and comparisons with other big hotels within Purbeck.

I hope the above information will assist in your preparation of an Environmental Statement. I am however obliged to point out that the information is given without prejudice to the consideration of

any subsequent planning application. A planning application will be subject to the statutory consultation process and the formal decision of the Council, based on all information available at the time and taking account relevant planning policy and advice. This may result in a request for additional information and the Regulations provide, that notwithstanding the contents of this scoping opinion, the Council is not precluded from requiring additional information in connection with any submitted Environmental Statement.

Yours sincerely

Andrew Collins
Principal Planning Officer