

[REDACTED]

From: [REDACTED]
Sent: 09 July 2024 16:26
To: [REDACTED]
Subject: FW: P/FUL/2022/06840 Knoll House Hotel Biodiversity Plan (our ref 9405)
Categories: Knoll House Hotel

From: Robbie Mackenzie [REDACTED]
Sent: 16 January 2024 09:51
To: Ben Read [REDACTED]
Cc: Dominic Farmer [REDACTED]
Subject: FW: P/FUL/2022/06840 Knoll House Hotel Biodiversity Plan (our ref 9405)

Hi Ben,

A fairly promising response from the NET team, but a pity it couldn't be delivered prior to the committee date. I assume there is still merit in addressing their final concern re lighting?

Kind regards,
Robbie

Robbie MacKenzie BSc (Hons) | Associate



Ecology Solutions Limited
Farncombe House | Farncombe Estate | Broadway | Worcestershire | WR12 7LJ

[REDACTED]
[REDACTED]
Hertfordshire | +44 (0) 1763 848084 | east@ecologysolutions.co.uk
www.ecologysolutions.co.uk

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From: Biodiversity Protocol [REDACTED]
Sent: Monday, January 15, 2024 2:54 PM
To: Robbie Mackenzie [REDACTED]
Cc: Ben Read [REDACTED]; Dominic Farmer [REDACTED];
Jodie Dixon [REDACTED]; Ursula Fay [REDACTED]
Subject: RE: P/FUL/2022/06840 Knoll House Hotel Biodiversity Plan (our ref 9405)

Hi Robbie,

Many thanks for making those changes to the Biodiversity Plan.

I take your point about securing the deliverability of new trees through the LEMP, and I will suggest that such a condition is applied should permission be granted.

Likewise I take the point about the grassland losses being temporary, as far as the Metric is concerned, and that the protection/reinstatement of this habitat will be set out within a CEMP/LEMP. As above I will suggest that a CEMP condition is applied should permission be granted.







The provision of additional enhancements for bats and birds, and the plan showing these and the dark corridors, is welcome. The only addition I'd ask you to make is to link the dark corridors to the lighting strategy, which would be secured by condition, and set out the principles and parameters for how impacts on the dark corridors will be mitigated through this strategy i.e. maximum lux level in the dark corridor, reference to ILP guidance note 08/23 etc. We will then be in a position to provide a certificate of approval.

Kind regards
Sam

**Ecology Unit
Natural Environment Team
Place Services
Dorset Council**


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From: Robbie Mackenzie 
Sent: Tuesday, January 9, 2024 9:17 AM
To: Biodiversity Protocol 
Cc: Ben Read ; Dominic Farmer 
Jodie Dixon ; Ursula Fay 
Subject: RE: P/FUL/2022/06840 Knoll House Hotel Biodiversity Plan (our ref 9405)

Hi Sam,

Many thanks for such a fast response on this and thank you for your time on the phone yesterday to clarify issues relating to the biodiversity plan. We have now produced an updated Biodiversity Plan which now includes measures for Badgers and also proposes an additional 7 bat boxes onsite and 10 offsite; an additional 10 bird boxes onsite and 10 offsite; and two log piles onsite – these measures are shown on our updated biodiversity plan figure which I have included at the end of the Biodiversity Plan PDF. The remaining concerns are addressed below.

With regard to concerns regarding the new tree provision, detailed planting, management and remedial measures would be detailed within a LEMP, which could be secured by way of a planning condition. This is a standard approach used to secure the deliverability of landscape measures and the subsequent BNG value calculated at this stage.

We have now provided indicative dark corridors on our updated figure within the Biodiversity Plan and as mentioned previously, our client is happy to agree to the provision of a lighting, which could be secured via a planning condition. We have removed the appropriate assessment enhancement measures from the plan such as mire and heathland restoration, circular walk etc., as suggested. Please also note that the proposed dog walking

area has since been removed from the proposals and it has also now been confirmed that there will be no dogs permitted on the premises as part of the new hotel complex.

With regard to your final query relating to the acid grassland in the southernmost area of the site, I have spoken with our client and they advise that it is likely that small areas of acid grassland will be temporarily damaged through reprofiling/regrading works, adjacent to the proposed hardstanding within the vicinity of the habitat, the majority of this habitat would not be impacted and would be fenced off during construction. Minor impacts to the habitat through reprofiling works would be temporary and short-lived and a detailed strategy regarding the protection/reinstatement of this habitat would be set out within a CEMP/LEMP which could be secured via a planning condition. Given the minor and temporary impacts to this habitat, it is not considered that this would materially alter any conclusions of the Environmental Statement. With regard to the treatment of this habitat within the BNG calculation, given that such impacts would be short-lived and temporary, the extent of the grassland in the south of the site has been inputted into the metric as retained, in line with the DEFRA Biodiversity Metric 4.0 User Guide, which states:

“7.3.6. A temporary loss is where there is restoration of a habitat, to its baseline type and condition within 2 years of the date of initial habitat loss, delivered in the same location. Where this applies, the habitat may be entered into the metric as ‘retained’.”

I hope this is useful and please do let me know if you have any further queries at all.

Kind regards,
Robbie

Robbie MacKenzie BSc (Hons) | Associate



Ecology Solutions Limited
Farncombe House | Farncombe Estate | Broadway | Worcestershire | WR12 7LJ
[Redacted]
[Redacted]
Hertfordshire | +44 (0) 1763 848084 | east@ecologysolutions.co.uk
www.ecologysolutions.co.uk

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From: Biodiversity Protocol [Redacted]
Sent: Friday, January 5, 2024 12:45 PM
To: Robbie Mackenzie [Redacted]
Cc: Ben Read [Redacted]; Dominic Farmer [Redacted];
Jodie Dixon [Redacted]; Ursula Fay [Redacted]
Subject: RE: P/FUL/2022/06840 Knoll House Hotel Biodiversity Plan (our ref 9405)

Dear Robbie,

Many thanks for submitting these documents. We've also separately received an email, with revised BNG Metric attached, which provides a response to our comments from 28th December. I can see that the Metric has been amended to split out the small area of acid grassland in the south of the site, which is outside of the curtilage of the hotel complex but within the site boundary, and which is retained at the same condition. Despite this change I still

do not feel able to alter my advice to the case officer, that the percentage biodiversity gain through the Metric should not be given substantial weight in decision making, because the application relies heavily on planting of trees in order to achieve the approx. 32% gain, and I can see that the Tree Officer has raised concerns regarding the damage and premature decline of these trees, due to “the less than ideal growing conditions, and variable resilience to change”.

Notwithstanding the above, unfortunately the Biodiversity Plan does not contain a sufficient level of detail, or certainty, to allow us to provide approval. It is evident that a number of recommendations for mitigation have not been carried across from the ES, and that some of the mitigation in the ES is itself vague or lacking in detail. In addition, it appears that much of the off-site mitigation/enhancements are not secured in a way that would allow them to be relied upon. Nb the BP may benefit from removing reference to any enhancements whose primary purpose is to mitigate impacts on habitats sites. Previous comments provided below for ease:

- *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 also raised a point previously regarding protection of the grassland in the south of the site. This habitat is near to structures which will be demolished, and some documents seems to suggest reprofiling/raising ground levels in the south of the site either where the grassland is located, or adjacent to this area, though there is a lack of clarity here. Please clarify how the grassland will be retained and protected during demolition/construction otherwise it may need to be described in the Metric as being lost.

- *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.*

Kind regards
Sam

**Ecology Unit
Natural Environment Team
Place Services
Dorset Council**


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From: Robbie Mackenzie [REDACTED]
Sent: Friday, January 5, 2024 9:38 AM
To: Biodiversity Protocol [REDACTED]; Natural Environment Team [REDACTED]
Cc: Ben Read [REDACTED]; Dominic Farmer [REDACTED]; Jodie Dixon [REDACTED]
Subject: P/FUL/2022/06840 Knoll House Hotel Biodiversity Plan (our ref 9405)
Importance: High

To whom it may concern,

Following submission of a planning application in November 2022 for the proposed development at Knoll House Hotel (P/FUL/2022/06840), it has just been brought to our attention that a biodiversity plan has not been approved as part of the application.

We have promptly completed the biodiversity plan (please see attached) as requested, which is consistent with the mitigation set out within Chapter 7 Ecology of the Environmental Statement and we are seeking your approval of this document. I also attach the enhancement plan (Figure 7.5) that is referenced within the biodiversity plan for ease. The application is due to go to committee on 10th January, therefore I would really appreciate your urgent assistance with this.

I look forward to hearing from you.

Kind regards,
Robbie

Robbie MacKenzie BSc (Hons) | Associate



Ecology Solutions Limited
Farncombe House | Farncombe Estate | Broadway | Worcestershire | WR12 7LJ

[REDACTED]
[REDACTED]
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