

Email To: [REDACTED]

Our Ref: EA1/2018/0005,  
EA2/2018/0002

Date: 14 September 2018



Ms Taya Cotterill  
Rapleys LLP  
21 Prince Street  
Bristol  
BS1 4PH

Dear Ms Cotterill

**Town and Country Planning Act 1990 (as amended)  
Town and Country Planning (Environmental Impact Assessment) Regulations 2017**

**Application No:** EA1/2018/0005, EA2/2018/0002

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

**Description:** EIA Screening and 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 revised Screening and Scoping Opinion dated 19 June 2018 made on behalf of Knoll House Hotel Ltd.

In accordance with this request, please treat this letter as the Council's Screening and Scoping Opinion under Regulation 7 and 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 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.

This assessment is based upon the response of 18 May 2018 under reference EA2/2018/0001, the subsequent meeting on site with representatives of Dorset AONB team and Natural England and letter reference TC17-02650. In this case the Council would therefore consider the scope of any submitted Environmental Statement should address the following main issues:

Landscape and Visual Impact of the proposal on the character and visual amenity of the area  
Impact on biodiversity and ecology  
Socio-economic considerations

**Landscape and Visual Impact**

There are 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

Development Manager  
**Alan Davies**



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. The AONB Landscape Officer 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 key aspects of the discussions undertaken regarding the scope of the Landscape and Visual Impact Assessment (LVIA) are as follows:

- The LVIA must use a methodology that conforms to the 3rd edition of the Guidelines for Landscape & Visual Impact Assessment.
- The primary study area for the LVIA will 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) must be provided, showing both bare earth conditions and accounting for obstructions.
- 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.
- Agreed viewpoints will benefit from both panoramic and single frame images, taken in accordance with industry standards (50mm images using a full frame camera).
- Visualisations must be produced from a selection of the viewpoints, to illustrate the appearance of the new proposals. Final agreement on these locations need to be reached in due course and there will be consideration of the presentation of these images using 75mm projected focal length.
- Effects on the Heritage Coast (HC) must 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).
- Effects on the Jurassic Coast World Heritage (WHS) Site are foreseeably limited to the presentation and visitor experience of the site. These must 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).
- 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.

### **Biodiversity and Ecology**

The EIA must provide sufficient information to allow the various elements to be properly assessed so that the Council and Natural England can be certain of the outcome. The assessment must provide the following details:

- 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 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, should be considered. In the instance of new fencing being proposed, there may be concerns about diverting pressure into the designated sites.
- The likely effects of recreation impacts on other nearby designated sites including the Dorset Heathlands, coastal SAC sites and Poole Harbour SPA / Ramsar must be considered.
- The effects of the proposal on current levels of vehicle use must 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. The applicant will need to demonstrate nitrogen neutrality in relation to Poole Harbour SPA / Ramsar.

### **Socio-economic considerations**

The proposal has the potential to provide significant investment to the District. A Local Economy Impact Assessment must 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 screening and scoping opinion, the Council is not precluded from requiring additional information in connection with any submitted Environmental Statement.

In addition to the Environmental Statement and any document referred to above, any subsequent application should be accompanied with the following;

Heritage Impact Assessment  
 Transport Assessment  
 Arboricultural Impact Assessment  
 Geotechnical and Geoenvironmental Study  
 Biodiversity Mitigation Plan

# Construction Environmental Management Plan

Yours sincerely

Andrew Collins  
**Principal Planning Officer**