

- **CONSULTATION RESPONSE: Tree Team East,** [REDACTED]

SITE: P/FUL/2022/06840 - Knoll House Hotel, Ferry Road, Studland, Swanage, BH19 3AH

PROPOSAL: Redevelopment of existing hotel to provide new tourist accommodation including: 30 hotel bedrooms, apartment and villa accommodation and associated leisure and dining facilities.

CONCLUSION: The application is not supported. There are anomalies in the submission. Comments made by the Landscape & AONB officers are noted, with general agreement. The trees are widely acknowledged to make an important contribution to the character of the area. They are relied upon, to a considerable extent, to help to try merge the proposal into the setting. Given the trees' importance, the less than ideal growing conditions, their age and variable resilience to change, versus the magnitude of the development, I have concern that damage/premature decline through direct and indirect effects is likely to result. The arboricultural impact assessment uses minimum root protection areas, based on BS5837:2012 Trees in relation to design, demolition and construction, an increase of space/undisturbed areas around trees would be beneficial as would more allowance for more effective and meaningful tree planting.

COMMENTS, principal areas of concern

- **Prominent & sensitive site.** AONB & Heritage Coast – protected by the NPPF. The reliance on existing trees together with proposed new planting, is unlikely to sufficiently offset the visual impact of the proposal, given the scale & massing of buildings. The present hotel & its associated activities are set within/screened by scattered trees, particularly pines. This results in a low to moderate impact on the character of the area, in my view. The proposed scheme, with its mass and form, especially views from Ferry Road and the south, tips the balance considerably.
- **Levels** across and adjacent to the site are very varied. They have a fundamental effect on existing trees and are a major consideration. The proposal involves much groundwork. Any excavation or fill, particularly within rooting areas, has the potential to seriously damage trees. It is vital that any proposal includes design details sufficient to demonstrate no harm to existing trees. I have seen insufficient detail to convince me that this is possible.
- T40 oak, one of the best trees on site, category B. Located close to south boundary and Ferry Road frontage. Layout infringes RPA and crown requires pruning to provide vertical clearance over proposed structure. Tree not yet mature and has potential to increase in size and amenity value. Consider that the building should be re-sited/redesigned as it is unacceptably close to the tree.

- **Green roofs** – would seek assurance that an assessment of the prevailing environmental conditions will be undertaken to determine suitable vegetation. Such roofs will often have a period of browning off during dry spells and spp choice, establishment & adequate planning and maintenance is essential. A detailed design & maintenance plan is required as part of any overall detailed landscape proposal.
 - **Woodland Management Plan** – The plan area is important, not least for landscape/screening reasons. However, it appears to be outside the red line & this needs clarification. If it is outside the red line, we need to think how best to secure its appropriate management. Reliance on the woodland area to screen this prominent site, particularly from the west, but also from the south and north, means that a robust enforceable framework agreement is needed. It is noted that the proposal is to remove most sweet chestnut & holm oak. Although, sweet chestnut is included in the planting schedule, perhaps not most appropriately, elsewhere on the site. Specific holm oak could be very useful for year-round screening. Inclusion of evergreen trees in the woodland would be desirable, especially when deciduous trees are not in leaf. The plan needs careful consideration to be given not only to nature conservation but also to visual amenity aspects. Without appropriate management of this area, and control thereof, any development could become increasingly intrusive.
 - **Landscape strategy plan** - Plan submitted. In my view, for a development of this size and impact, the plan is insufficient to demonstrate that the proposal will sit comfortably within the setting. This is largely due to the proposal's scale, form and effect on the wider public amenities. Given the design, the distribution and type of proposed planting is dictated by the layout. From a public aspect the internal landscaping is not as important as that near the boundaries. The plan only goes part way to address this and is insufficient to outweigh the above concerns. The southern boundary of the plan does not include adjacent land, to its south, although it appears to be within the red line. This area provides scope for significant tree planting, to screen the development including the bar/restaurant/spa/terrace etc. Towards the west end of the southern boundary there is a note on plan "advanced nurse stock conifer", but the species are not included on the drawing's schedule. Although obvious why the conifers have been so deliberately placed, such a distinct line may draw the eye rather than avert it. Regardless of species I question whether successful planting of trees, nearby the car park is practicable given the restricted space. For completeness and transparency, it would be useful to include the woodland management plan area and green roof proposals on one drawing or cross-referenced set of drawings. The plant schedule notes trees/shrubs/hedges site boundaries & woodland edge to feature mostly shrubs (it is accepted that hawthorn & holly can be small trees) and only one tree species is listed – a field maple – which is an ultimately middle-sized tree. Most of the additional planting on the eastern Ferry Road frontage is shrubs excepting for new conifer tree planting shown at the northern end of the frontage, otherwise the existing trees are relied upon.
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NOTES

Existing tree stock, numbers (taken from submitted survey & Arb Impact Assessment info - based on drawing provided by project architect.)

Total tree stock comprises (1 category A; 58 category B; 33 category C) :77 individual trees; 11 groups; 3 hedgerows; 1 woodland .

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

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

NOTE: 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.

The ground levels within and immediately adjacent the site are very variable, across the whole site with considerable changes. This in itself presents a challenge in minimising potential damage to existing trees.
