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BY EMAIL ONLY

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Dear Mrs Fay

Planning consultation: 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

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.

The application proposes the following :

- 30 hotel rooms
- 22 apartments- *now 18*
- 26 villas
- 79 parking spaces – *now 75*
- 36 cycle spaces
- Restaurant and spa complex including indoor/outdoor pool
- Associated landscaping, public realm, biodiversity enhancements, drainage, access and servicing infrastructure.

This advice is in addition to and complements that in our letter dated 9 May 2023 with which it should be considered.

Objection sustained

Natural England advise that it is not possible to ascertain that there will not be an adverse effect on the integrity of the nearby habitats sites:

Dorset Heathlands SPA

Dorset Heaths (Purbeck and Wareham) and Studland Dunes

Dorset Heathlands Ramsar

The application has altered as set out above which has reduced the apartment (and parking) capacity by 4 units however the application remains for a significant number of C3 dwellings in a very sensitive location where access to the designated sites for recreational uses will cause harm to the features. Access may not be effectively controlled because the land is also Open Access land under CRow Act. Whilst some mitigating measures are proposed it is unclear if these can be suitably secured because they lie outside of the applicants ownership and their legal control over adjoining land is not in perpetuity. There is no evidence that the landowner would be prepared to enter into a suitable agreement as a third party which would enable the council to be certain that if the leasehold was terminated they would maintain the mitigation measures.

I advise that whilst the numbers of residents (capacity) is a factor in the consideration (it is still the case that there is an increase in visitor numbers) it is more important how the facilities operate. It is my view that the current policy position with regard to additional C3 units is robust. Visitors occupying the 44 apartments/villas (on the basis of frequent return visits) are likely to make more frequent and intensive use of the nationally important landscapes and designated sites on their door step. The nature of the uses made by occupants in the proposed C3 units will be different from those in the current facilities giving rise to a greater risk and an increased level of harm due to recreational access.

Natural England is not able to discount the risks of recreational access from staff employed at the site because of the highly attractive nature of the surrounding countryside irrespective of the staff being resident or not. The application indicates that there will be a significant increase in staff at the facility with a wider range customer attractions offered.

Ecology Response

Natural England have advised the planning authority NET concerning the adequacy of the habitats survey provided with this application. Impacts on the areas of land within the applicants control but not necessarily the planning application are a consideration in relation to any mitigation proposals etc.

Natural England note the provision of additional information relating to the location of the bat emergence surveys and reptile refugia which is helpful.

Natural England has considered the absence of any bat foraging survey and the local site conditions. It is suggested on the basis of habitat suitability that the surrounding woodland/woodland edge are of most importance to foraging bat species. A suggested approach to minimise/avoid impacts from lighting is set out below.

The information provided in relation to habitats, bird and bat boxes proposed is helpful.

Landscape impacts on the Dorset National Landscape/AONB

The proposed green roof will have some limited landscape value, whilst it is agreed that during summer dry periods the colour will be more brown than green this would reflect the surrounding landscape at the time. The priority should be to establish a feature which requires low maintenance and sustains a suitable vegetation cover. Typically the use of native sedum and locally sourced fine grasses to reflect the landscape. This may be secured through a planning condition or similar. The advice set out by the AONB Team is sound on this matter.

The applicant has followed the advice provided in reducing the height of the apartments from 4 to 3 storeys at the north of the site however at the highest part of the site the 3 storey apartments remain unaltered. Natural England support the position outlined by the AONB Team that in this highly sensitive location it is also important to consider the detailed aspects of the proposal such as the extent of glazing, consequent light spillage, not just in the immediate vicinity but across the wider landscape. The principle of solar panels is welcomed but the applicant should review the proposal to confirm if low reflectivity panels and flexible solar strips may be incorporated to reduce glare more effectively.

The advice of the AONB Team and Landscape Officer is supported by the Councils Tree Team officer. There is inadequate root protection given the poor soil quality and extent of development proposed. It seems at best uncertain that the proposal be able to demonstrate that the trees necessary to provide effective existing and ongoing visual and landscape mitigation would not be adversely affected and key features lost.

The use of selected evergreen species in the woodland is reasonable however these should be native species or species with a low propensity for spreading through seedlings, holm oak is not an appropriate species. Planting in areas which are priority grassland habitats eg to the south, should be avoided

The advice of the councils senior Landscape Officer is similarly focussed on concerns relating to the “scale form and massing of the buildings/visual impact of the development” as well as detailed points of design. Natural England support these comments which highlight the remaining impacts on the Dorset National Landscape. In particular Natural England conclude that there are some significant adjustments required but also a cumulative effect of a number of less individually fundamental concerns which need to be properly addressed by the applicant.

The proposed Woodland Management Plan is critical to allowing an assessment of landscape impacts at the time of the determination of the application.

Natural England maintain its **objection** in respect of adverse impacts on the Dorset Natural Landscape (AONB)

Lighting strategy (bats/nightjar)

Natural England advise that in the absence of evidence concerning the foraging use of the site by bats (an emergence survey only is available), as well as any assessment of the sites use by nightjar it is proposed that the applicant be required to produce a lighting strategy. This will ensure that in the interface between the development and the woodland area to the west and north the light spill into the woodland will be avoided and that the lighting will accord with BCT standards. The applicant should provide a suitable strategy prior to commencement with correspondence from their ecological advisor that the appropriate lighting quality and directional management is in place to avoid harm.

Drainage strategy

The applicant has indicated that drainage from surface waters would not now be towards the designated sites. There are no plans available to indicate where this may be going and if it would be acceptable.

The applicant does not appear to have addressed the issue of foul water capacity and over flows from the nearby pumping station to demonstrate the avoidance of harm to the SAC and Ramsar habitats.

Nutrient neutrality

Information previously provided confirmed that occupancy of the existing and proposed facility would alter over the year. The applicant has chosen to present an overly simplistic view of the occupancy level as a maximum relative to 100% year round occupancy. Natural England has reviewed the information in this supporting document against information in the previous application and is able to confirm that within the context of seasonal variations in occupancy as well as staffing levels it would be reasonable for the authority to conclude that it is likely the development would achieve nutrient neutrality for nitrogen and phosphates as is required.

I trust this information will assist the authority.

Yours sincerely

Nick Squirrell
Conservation and Planning Lead Advisor
Dorset Team
Wessex Area Team
Natural England

Landscape strategy plan: KHH001

The following species should not be used in the planting scheme, either because these are native but inappropriate to the context:

Erica ciliaris
Erica tetralix
Daphne odorata
Cytisus scoparius
Juniperus communis/prostratus