

**RICHARD  
SNEESBY**

LANDSCAPE ARCHITECTS

Knoll House Hotel, Studland, Dorset

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## Landscape and Visual Proof of Evidence

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LPA: Dorset Council

Appellant: Kingfisher Resorts Ltd

November 2024

Prepared by Richard Sneesby FLI, BSc (Hons), MA

on behalf of Kingfisher Resorts Ltd

Section 78 Appeal

Planning Inspectorate Ref: APP/D1265/W/3348224

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## KNOLL HOUSE HOTEL

### LANDSCAPE AND VISUAL PROOF OF EVIDENCE – DRAFT NOTES

Prepared by Mr Richard Sneesby FLI, BSc, MA

#### 1. Witness

- 1.1 I am Richard Sneesby, Director of Richard Sneesby Landscape Architects a Registered Practice with the Landscape Institute. I have a BSc in Natural Environmental Science and Landscape Architecture and an MA in Landscape Architecture from the University of Sheffield. I became a Chartered member of the Landscape Institute (CMLI) in 1989 and was granted Fellowship of the LI (FLI) in 2020 in recognition of my contribution to the profession. I have had a career in landscape architecture spanning more than 40 years.
- 1.2 I have been appointed by the appellant to provide landscape and visual evidence to the inquiry opening on 11<sup>th</sup> December 2024. This proof of evidence forms a component part of the Appellant's Case.
- 1.3 I have completed over 80 LVIA/LVA/VIA's many of which are for developments within designated landscapes including AONBs (now National Landscapes) and some within World Heritage Site designations. The practice has undertaken landscape masterplanning, detailed design and implementation for historic houses and buildings some of which are listed and within gardens on the Historic Garden Register. In 2023 I was appointed by Cornwall Council to develop benchmark visualisations for their Nature Recovery programme. My work also covers private and commercial landscapes and gardens, commercial projects, housing, holiday developments and farm diversification schemes.
- 1.4 I am Head Judge of the Society of Garden Designers (SGD) Annual Awards, a role I have held since 2011 and have been a Senior Show Garden Judge for the Royal Horticultural Society (RHS) since 2015. I have acted as a Judge for the LI Awards.
- 1.5 In the 1980's I worked for Weddle Landscape Design in Sheffield on land reclamation projects, countryside parks and commercial schemes. I was a senior designer for the landscape at Pearl Assurance Headquarters in Peterborough which has recently been added to the Historic Garden Register. Between 1993 and 2014 my career centered on academia where I created a new degree programme and was Course Leader of the BA Garden Design at Falmouth University. I was Course Leader of BA Landscape Architecture at the University of Gloucestershire for 10 years having taught at the University of Sheffield prior to that. Since leaving Falmouth University to establish my private practice I have taught regularly at Duchy College and the Eden Project in Cornwall. I have

published three books on landscape and garden design and wrote the design section of the RHS Encyclopedia of Garden Design.

- 1.6 The evidence which I have prepared and provide for this appeal in this Proof of Evidence is true and has been prepared and is given in accordance with the guidance of my professional institution and I confirm that the opinions expressed are my true and professional opinions.

## 2. The brief

- 2.1 I was first appointed in August 2022 to provide LVIA as part of an Environmental Statement to support a planning application for Knoll House Hotel.
- 2.2 I was not involved in the previous 2018 application (ref: 6/2018/0566) or the major design stage for the appeal site. I was appointed to undertake an LVIA in three stages. First, to establish the currency of the 2018 LVIA submitted as part of the earlier refused application and to look for opportunities to re-use some of the mapping, desk study findings and representative viewpoints. Second, to share the early findings of my LVIA with the design team as part of an iterative design development. Thirdly, to carry out an LVIA for the final iteration of the proposals as part of the Environmental Assessment.
- 2.3 Not being involved with the major design stage, I was able to join the team from a position of independence from the project. This allowed me to undertake a fresh and un-biased assessment of landscape and visual effects.
- 2.4 A previous 2018 application (ref: 6/2018/0566) for the site was refused. For this earlier scheme an LVIA was produced by Landscape Visual Limited, and it was agreed with the LPA that much of the LVIA remains relevant to the current proposal. In particular the selection of viewpoints, ZTV mapping. The adoption of some parts of the previous desk study was intentional as it allowed a direct comparison between the previous scheme and the current application without any ambiguity of the baseline condition. Where any changes to the landscape had occurred since 2018 these were referenced but are limited to a new housing development at Glebeland Estate Studland and alterations to the significance of the ZTV modelling.
- 2.5 Landscape Visual Ltd agreed eight viewpoints in 2018 with the Dorset Area of Outstanding Natural Beauty (AONB) Landscape Planning Officer Richard Brown CMLI. Use of the same agreed viewpoints in 2022 was agreed through email correspondence with Richard Brown in August 2022. It was noted that the 2018 photographs are winter views and should be included, along with current 2022 late-summer views, to illustrate the widest range of visual effects. These have also

been supplemented in 2022 with additional viewpoints found at the site visit to increase visual representation from the surrounding area.

- 2.6 The LVIA process commenced in August 2022 with a full desk study starting with the findings of the previous LVIA. A site visit was carried out in September 2022 to assess the current relevance of the viewpoints and to photograph additional viewpoints where it was considered that some key views had been missed. Key viewpoints were developed as photomontage ‘before and after’ illustrations (by AWW Architects) (CD1.059) to both interrogate visual effects to inform design development, and to provide clarity to those reviewing the proposals. The original viewpoint photographs included in the ES were re-formatted following feedback from the LPA to meet the recommendations of the LI Technical Guidance Note 06/19 ‘Visual Representation of Development Proposals’.
- 2.7 The LVIA (CD1.059) was submitted with the application and prepared using the Guidelines for Landscape and Visual Impact Assessment, Third Edition, 2013 (GLVIA3). The findings of the LVIA received no adverse comments on the methodology, or the selection and representation of viewpoints.

### 3. Key matters covered by this Proof of Evidence

3.1 This Proof of Evidence covers the following key matters:

- Response to landscape matters cited in Dorset Council’s reasons for refusal
- Response to landscape matters cited in Dorset Council’s Statement of Case concerning landscape matters. This covers matters relating to the Council’s statements on the impacts upon described landscape character and visual receptors, and adherence to current planning policies. The Council’s Statement of Case cites the following policies as influential in the decision-making process:
  - NPPF Paragraphs 135 and 136
  - The aims and objectives of NPPF Paragraphs 177 & 178
  - Purbeck Local Plan Policies D, TA, CO and LHH
  - Dorset AONB Management Plan 2019-24 Policies C1 a, c and f; C2 d, e, and f; C4 a, c, d, e, f and g.

3.2 The Appellants adherence to, and interpretation of, these policies is covered within the responses to the Council’s Statement of Case

## 4. Context underlying the assessment of landscape effects

4.1 This Proof of Evidence, and the LVIA, are grounded upon several fundamental contextual landscape matters:

- i. Recognition that the effect of the proposal upon landscape designations forms a key focus for the Inspector. The area is highly designated and popular with visitors pre-occupied with enjoyment of the scenery.
- ii. A focus upon the assessment of the predicted effects upon the described landscape character, landscape designations, and particularly the special qualities of the Dorset AONB.
- iii. Recognition that the proposal involves changing one complex of buildings for another within the same site boundary. No changes are proposed to land outside the existing site which will remain as the baseline condition.
- iv. Recognition that the current hotel complex is in poor condition, has developed through incremental and unplanned random additions to the hotel buildings and its associated infrastructure in the second half of the 20<sup>th</sup> century, and is now a complex of buildings which are inherently harmful to the landscape character, visual receptors, and the AONB designation.
- v. Recognition that much of the existing hotel complex (baseline condition) precedes the AONB designation and would likely be inviable when tested against current AONB, NPPF and local planning policies.
- vi. Recognition that a new hotel is needed which requires high quality architecture which responds to current policies and avoids harm to the landscape character, landscape designations and visual receptors.
- vii. Recognition that the appeal site proposal has learned from a previous refused application and has been developed using a landscape-led approach at the heart of the project.
- viii. Recognition that, within their Statement of Case, the Council has omitted any reference to the effect of the baseline condition upon the existing landscape character and misses a key focus for the inquiry which must recognise the harm exhibited by the existing hotel on the surrounding landscape designations and scenic perceptions.
- ix. Recognition that the hotel landscape will change as a result of the development including felling trees and establishing a wider range of new tree and shrub/scrub species which will increase the tree cover both in quantum and as part of the visual and perceived inter-connectivity with the surrounding host landscape. These considerations should form part of the assessment of effects upon landscape character.

## 5. Reasons for refusal of planning permission

### 5.1 Planning permission was refused for the following reasons relevant to the landscape:

#### Reason 1

*The proposal has been assessed as being major development within the Dorset Area of Outstanding Natural Beauty (AONB). As such there is a requirement to assess the impact upon the local economy, any scope for developing outside of the AONB and ensuring that there is no detrimental effect on the environment and landscaping. The proposal by reason of its scale, form and massing fails to ensure that there would be no detrimental effect upon the environment and natural landscape and fails to be compatible to the special character of the Heritage Coast. This impact has been considered against the substantial local economic benefits. The proposal however is contrary to Policies D, TA, CO and LHH of the Purbeck Local Plan Part 1, the aims and objectives of the NPPF, especially paragraph 177 and 178 and Policies C1 a, c and f, C2 d, e, and f and C4 a, c, d, e, f and g of the Dorset AONB Management Plan 2019 - 2024.*

#### Reason 5

*Insufficient evidence has been submitted to demonstrate that the proposals will not result in damage/premature decline to trees proposed for retention through direct and indirect effects due to less-than-ideal growing conditions, their age and variable resilience to change, versus the magnitude of the development. In addition, insufficient details have been submitted to demonstrate that landscaping within the site including proposed earthworks will result in visually attractive, appropriate and effective landscaping of the development. The proposed development is therefore contrary to Policies LLH and D of the Purbeck Local Plan and paragraphs 135-136 of the NPPF.*

### 5.2 In this evidence I shall deal with the landscape and visual aspects of Reasons 1, which considers the buildings as they are said to affect the setting and landscape character. This will cover matters of visibility of the proposals from the surrounding area. Matters to do with the architecture and the scale and massing of the buildings will be dealt with by Mr Mark Alker-Stone, the Architecture witness. Matters to do with planning policy will be dealt with by Mr Ben Read, the planning witness.

## 6. Response to reasons for refusal

### 6.1 Dorset Council's statement of case – Key matters affecting landscape impact

6.1.1 Dorset Council has set out its reasons for refusal on landscape grounds citing landscape harm and impacts on the National Landscape - Dorset Area of Outstanding Natural Beauty (AONB) and the Heritage Coast. Key matters covered in the proof of evidence are **emboldened**.

6.6 *The proposal is located in the Dorset National Landscape AONB (“the AONB”). Policy E1 of the Local Plan states that great weight should be afforded to conserving and enhancing the Dorset National Landscape and that the scale and extent of any development within this designated area will be limited. It also refers to the tests set out in the NPPF which apply to proposals for major development within AONBs. Full weight should therefore be attached to this policy which is consistent and directly aligned with national policy.*

6.7 *The Council's position is that this proposal is contrary to Policy E1 as it constitutes major development for the purposes of NPPF paragraph 183 and there are no exceptional circumstances justifying it (this is set out in more detail below).*

6.8 *However, even if the proposal is not major development, **this proposal in any event due to its scale, form and massing does not conserve and enhance the landscape and scenic beauty of the area and the special characteristics of the South Purbeck Heaths Landscape Character Area in particular. It is inappropriate in terms of its appearance, scale and height, and would significant adversely affect the character and visual quality of the local landscape.***

6.9 *Policy E12 (Design) states that proposals should demonstrate a high-quality design that (a) positively integrates with its surroundings and (e) avoids and mitigates any harmful impacts including light pollution on local amenity. Policy **Since the proposal does not conserve and enhance the landscape and scenic beauty of the area, for the avoidance of doubt it follows that it does not positively integrate with its surroundings and is therefore contrary to Policy E12 on this basis as well.** This policy is addressed in more detail below in respect of the more detailed design of the development and whether its design integrates well with its immediate surroundings. The design of the proposal*

therefore is also contrary to those elements of Policy E12 referred to above.

- 6.10 ***The Appellant contends, at Para 7.10 of their Statement of Case, that the majority of visual receptors are distant and the effects upon them are largely either not adverse or beneficial. The Appellant further contends, at para 7.11 that the development 'has been designed to be more visually recessive in the landscape than the existing baseline situation'. The Council disagrees with these assertions.***
- 6.11 ***The proposal has a significant negative impact on the important features of landscape character identified in the relevant Landscape Character Assessment for this part of the National Landscape and conflicts with the reasons for the designation of the AONB for its landscape and scenic beauty. This includes the undeveloped coast, panoramic views, tranquility and heathlands amongst other characteristics, all of which contribute to the scenic beauty.***
- 6.12 ***The proposal also adversely affects the visual quality of the area. It is visible from a number of visual receptors including the publicly accessible heathland to the west and from various rights of way.***
- 6.13 ***The Landscape Strategy Plan submitted in support of the proposal is, for a development of this size and impact, insufficient to demonstrate that the proposal would sit comfortably within the setting.***
- 6.14 ***The Council also considers that reliance on existing trees together with proposed new planting, is unlikely to sufficiently offset the visual impact of the proposal, given the scale and massing of the proposed buildings and other proposals such as the car park.***
- 6.15 ***The existing 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. The Council's concerns in relation to Trees are twofold. In the first instance, it has not been demonstrated that, given the size and scale of the proposed development, it would be possible to implement the proposals without damage to retained trees particularly where areas of excavation or fill are***



**proposed.** For instance, the T40 oak, one of the best trees on site, is a category B tree. Located close to south boundary and Ferry Road frontage, the proposed layout infringes the Root Protection Area, and the crown would require pruning to provide vertical clearance over proposed structure. This Tree is not yet mature and has the potential to increase in size and amenity value. The Council considers that the proposed building would be unacceptably close to the tree and will provide evidence to that effect.

- 6.16 **The reliance on existing trees together with proposed new planting, is unlikely to be sufficient to mitigate the harmful visual impact of the proposal and impact on character, given the scale & massing of buildings.** This lack of evidence adds weight to the concerns regarding landscape impacts, as there is doubt regarding the deliverability and long-term retention of the mitigation proposed.

*Major development and paragraph 183 of the NPPF*

- 6.17 *The Council also considers that, for the purposes of paragraph 183 of the Framework, the proposed development constitutes Major Development and that no exceptional circumstances exist to justify the development, nor have the Appellants demonstrated that the proposal is in the public interest.*
- 6.18 *The scale of the development is significantly greater than the existing hotel buildings. However, this is not the only measure to consider, and the Council's position has taken into account its nature, scale and setting, and whether it could have a significant adverse impact on the purposes for which the area has been designated or defined. (Footnote 64 to paragraph 182 and 183 of the Framework refers). **The Council considers it would have a significant adverse impact on those purposes, which includes their flora, fauna, geological and physiographical features.***
- 6.19 *Furthermore, the Council's evidence will demonstrate that the exceptional circumstances required to permit such development have not been established nor has it been demonstrated that such development would be in the public interest. This remains an area of disagreement between the parties (see para 7.13 & 7.14 of the Appellant's Statement of Case).*
- 6.20 *As such the proposal is contrary to paragraph 180, 182 and 183 of the NPPF and Local Plan Policies.*

## 6.2 Compliance with the Purbeck Local Plan 2018-34 (adopted 2024)

### 6.2.1 Descriptions relevant to the proposed development are **emboldened**.

Paragraph 25 of the PLP explanatory text states “*Purbeck’s unique environment has been shaped over centuries of interaction between people and place, giving **the area its uniqueness and sense of place and making it a very attractive place to live and visit**. This attractiveness brings associated pressures. **Striking the right balance between the needs of the population and future generations without compromising the distinctive qualities of the area is challenging**”.*

Paragraph 27 states “*Half of Purbeck is covered by the Dorset area of outstanding natural beauty (AONB) – a landscape designation that affords protection similar to a national park because of the beauty of the landscape. **Dorset’s AONB is a collection of fine landscapes, each with its own characteristics and sense of place that give the Dorset AONB its unique character**”.*

The Local Plan vision (at pdf p.18) states that “***The aim of the Purbeck Local Plan is to protect Purbeck’s distinctive character whilst improving the quality of life for the local community. The natural and historic assets of the area will be protected, whilst continuing to manage effective recreational access and use***”. And “***New development will have high standards of sustainable design and respond positively to Purbeck’s rich diversity of local architecture, beautiful landscape and wealth of wildlife. New development will also seek to provide necessary infrastructure to ensure good access to existing community facilities, services and open space, together with new facilities and services where necessary***”.

### 6.2.2 The effect of the development upon the statements above are covered within responses to Dorset Council’s Statement of Case below.

### 6.3 Dorset Council's Statement of Case Paragraph 6.8

6.3.1 These policies referenced within Dorset Council's Statement of Case are considered in turn below:

#### Dorset Council's Statement of Case Paragraph 6.8

Paragraph 6.8 contends that *“this proposal in any event due to its scale, form and massing does not conserve and enhance the landscape and scenic beauty of the area and the special characteristics of the South Purbeck Heaths Landscape Character Area in particular. It is inappropriate in terms of its appearance, scale and height, and would significant adversely affect the character and visual quality of the local landscape”*.

6.3.2 The site lies within the South Purbeck Landscape Character Area. The Purbeck Ridge, which runs west to east at the northern part of the character, areas affords panoramic views across the application site, is described as in Good and Stable condition. The site is visible from higher ground looking north from this NCA. The visual effects upon receptors within the South Purbeck LCA are fully assessed within the LVIA.

6.3.3 The site is located within the Lowland Heathland landscape character type (LCT) and the South Purbeck Heaths Local Character Area (LCA), and is described in the section Conserving Character, Landscape Character Assessment & Management Guidance for the Dorset AONB (Dorset County Council, 2008). The description remains current. The 2008 management guidance has been replaced by the AONB Management Plan 2019-2024.

#### LANDSCAPE CHARACTER BASELINE

6.3.4 The purpose of this section is to explain how the LVIA has arrived at its conclusions relating to the impact of the development upon described landscape characteristics. The described characteristics which will be affected by, or which have influenced the design of, the development are **emboldened**. Responses are included under each character description.

#### DORSET AONB LANDSCAPE TYPES AND LOCAL CHARACTER AREAS

6.3.5 The site is located within the South Purbeck Heaths Local Character Area (LCA) (<https://dorset-nl.org.uk/resource/south-purbeck-heaths/>). Key landscape characteristics, strength of character, landscape condition, landscape change and landscape guidelines for this host LCA are included below.

Key landscape characteristics of the South Purbeck Heaths LCA comprise:

- ***'Undulating and exposed heathland landscape with dense heather carpets, valley mires, gorse and isolated Scots pine***
- ***'Occasional small birch and oak woodlands***
- *'Patches of rough acidic grassland and small rough enclosed pastures*
- *'Mosaics of patchy heathland and scrub with woody thickets*
- *'Reed beds and marshes grading towards Poole Harbour*
- ***'Wide open views of colourful and textured heathlands with tranquil experience***
- *'Straight roads flanked by broadleaved woodlands and surrounding open heathlands*
- *'Occasional isolated linear and clustered settlements.'*

#### 6.3.6 Description of the South Purbeck Heaths LCA

##### ***Land shape and structure***

*The area has a distinctive and dramatic relief with small ridges rising to 100m, rolling hills, undulating lowlands with upstanding geological features of dark ironstone and valley bottoms. The underlying rock is soft and of sedimentary origin.*

##### ***Soils and vegetation***

*The soil is light, shallow, free draining and sandy. These impoverished conditions support a wide range of heathland habitats with heather, gorse, bracken, dry acidic grassland, **stands of birch, oak and pine**, reed beds and wet valley mires. The quality of these habitats is indicated by the wealth of national and internationally important nature conservation designations. The largest area of heathland survives within the army ranges near Lulworth.*

##### ***Settlement and land cover***

***Purbeck Heaths displays a complex mix of land cover.*** *Due to many of the heathlands being protected, much of the area is free of settlement except a few scattered farmsteads. **Towards Studland, landcover becomes more pastoral with small broadleaved woodlands.** Planned farms and ordered lanes lie within a relatively well-wooded landscape characterised by recent secondary and medium sized woodlands and tree belts. There is seasonal grazing of rough pasture on marginal uncultivated land along with some arable farming. Former mineral workings provide a range of interesting wetland habitats, with Blue Pool one of the best known.*

### **Historic character**

*The prevailing heathland character is the result of soil exhaustion through intensive farming, primarily in the Bronze Age. Along with the survival of open heathlands, the area is also dominated by recent large conifer plantations. **Some piecemeal enclosures with mixed woodlands are found towards the west.** A number of Bronze Age barrows survive here, particularly in the eastern part, but the most notable monument is probably Rempstone stone circle. A number of late Iron Age and Romano-British pottery manufacturing sites are recorded in the vicinity of Stoborough, part of a massive industry centred on Poole Harbour. Particularly notable modern monuments are the World War pumping station in Studland village, with pipes leading to the sea and Fort Henry from which Churchill viewed D-day preparations.*

### **Visual character and perceptions**

*The area has a diverse visual character appearance ranging from wild open heathlands to enclosed wooded areas. In the eastern and western extents, there is a lack of tree cover alongside gently rolling relief, providing impressive views, such as of the remote and colourful heathlands towards the tranquil fringes of Poole Harbour. The central area is wooded with a more intimate and enclosed feel.*

#### 6.3.7 The current strength of character is described as follows:

*The overall landscape is judged to have a **moderate** character. Although the area is affected by a wide range of land uses and pressures, heathland habitats are largely unsettled with consistent patterns of heathland features and have benefitted from recent enhancement though initiatives such as the Nature Improvement Area (NIA). Such measures have improved the management of existing heathlands and have removed a number of conifer plantations that had weakened the area's natural character. **Although a number of plantations remain, some serve to screen some industrial and residential development.** Agriculture and mineral workings have become part of the landscape and often provide well managed features.*

#### 6.3.8 The current landscape condition is described as follows:

***'The condition of the remaining heathland habitats is largely good** with continued ecological management practices, although they are subject to some scrub encroachment and birch colonisation. Much of the wider ecological condition has suffered from the planting of large conifer plantations with harsh geometric edges. Where heathland mosaics exist, these are also under constant pressures from further encroachment of woodland and scrub. Much of the area is*

*subject to urban pressures of visitor impact, fly tipping and fires, a particular problem on the more open heathlands. **As much of the area has lost its traditional heathland character, overall landscape condition is judged to be moderate and stable.***

#### 6.3.9 Landscape change in the South Purbeck Heaths LCA:

- *'Historical fragmentation of heathland habitats through woodland planting and development.*
- *'There is evidence of pressure for built development along major transport corridors.*
- *'The loss of features such as hedgerows, combined with inconsistent field boundary management has led to a reduction in the visual integrity of the landscape.*
- *'Intensive farming practices and more intensive grassland management has resulted in changes in the visual character of the landscape as well as a decline in important habitats.*
- *'The proximity to populations of surrounding towns could result in erosion by walkers and pressure for visitor facilities, fires and other urban pressures in the open landscape.*
- ***'There may be small scale development pressures in relation to fringes of existing settlements with further encroachment onto the open heathlands.***
- *'Scrub encroachment along roadsides obscures open views to the surrounding heathlands.'*

#### 6.3.10 Planning guidelines for the South Purbeck Heaths LCA:

- *Protect important conifer plantations that screen intrusive development with phased replacement to broadleaved woodlands. Ensure that commercial forestry plantation is located away from designated heathland and balanced with native deciduous planting, thereby enhancing natural character and delivering biodiversity gains.*
- *Secure appropriate mitigation measures and landscape enhancements resulting from further oil and gas extraction. **Resist new proposals that result in significant harm to the character and appearance of the National Landscape and/or its setting.***
- *Protect heathlands from excessive visitor pressure and associated infrastructure.*
- *Limit the impact of camping and caravanning sites. Restrict the expansion and creation of sites in areas where impacts are already significant,*

*including areas subject to notable cumulative effects. Control proposals to introduce new 'glamping' facilities, based on landscape and visual sensitivities. Pursue appropriate mitigation measures, including seasonal limitations, landscape enhancement measures and conditions that control noise and light pollution.*

- **Encourage the use of native planting in any landscape scheme associated with new development** and consider removal of unsympathetic species, such as the *Leylandii* screening hedges that stand out in the landscape.
- *Conserve the open character of rural lanes. Remove excessive signage and seek alternatives to infrastructure associated with urban development and out of scale traffic management schemes.*
- *Ensure mineral workings are mitigated as far as possible with clear aims for long term restoration.*
- *Promote under grounding of small-scale powerlines in open, sensitive locations*
- *Ensure that coastal and flood defences are compatible with the National Landscape's exceptional undeveloped coastline. Require the use of materials that are complementary to the character and appearance of their environs.*
- *Ensure that development linked to aquaculture and fishing is compatible with the National Landscape's exceptional undeveloped coastline. Avoid locating permanent infrastructure in sensitive areas and minimise the impact of essential infrastructure through good design.*
- **Avoid unnecessary and prolonged noise and light pollution. Require good design to limit the impacts and use appropriate planning conditions to secure ongoing control.**

#### 6.3.11 Management guidelines for the South Purbeck Heaths LCA:

- *Pursue the removal of and improved management of conifer plantations. Avoid clear felling except for heathland restoration and otherwise encourage continuous cover and phased transition to broadleaf species. Soften edges of retained woodland blocks to follow landform.*
- **Restore heathland habitats to improve extent and connectivity.**
- *Protect acid grasslands from further scrub encroachment.*
- *Restore mires back to functional ecosystems.*

- *Maintain the balance and monitor heathland mosaics from scrub encroachment, bracken and woodland succession, particularly where these buffer existing heathlands through promoting grazing regimes. Encourage woodland thinning within and around the wooded heath habitats.*
- *Conserve and enhance extensive grazing regimes.*
- *Enhance the function of habitats in supporting the wider ecological network, where appropriate.*
- *Protect stands of mature broadleaved woodland along roadsides and create glimpses of open heathlands through scrub clearance.*
- *Soften edges of existing woodland blocks to follow landform and protection of important views.*
- *Manage the impact of rising sea levels through creation of flood marsh around Arne Moors.*

6.3.12 The overall landscape is judged to have a **moderate** character and, “*As much of the area has lost its traditional heathland character, overall landscape condition is judged to be moderate and stable.*” The proposed development will not alter or affect the described characteristics. In respect of the planning guideline to “*Resist new proposals that result in significant harm to the character and appearance of the National Landscape and/or its setting*” the proposal replaces an existing which avoids harm to the described landscape characteristics. In respect of the planning guideline to “*Encourage the use of native planting in any landscape scheme associated with new development*” and the management guideline to “*Restore heathland habitats to improve extent and connectivity*” the proposed development adopts an approach to onsite planting which favours native species and habitat creation whilst acknowledging the amenity required by the hotel and guests. This is in stark contrast to the baseline condition which has little ecological value and a disconnection with the surrounding area and biodiversity.

6.3.15 In respect of the landscape character description of “*Wide open views of colourful and textured heathlands with tranquil experience*”, the LVIA describes the effect of the proposed development upon views experienced as part of the wider landscape, especially those from higher ground to the south. The LVIA assesses that the effect will be an improvement to the views when compared to the baseline condition.



6.3.16 In respect of the planning guideline to “*Avoid unnecessary and prolonged noise and light pollution. Require good design to limit the impacts and use appropriate planning conditions to secure ongoing control*”. This will be dealt with by the Architect’s Proof of Evidence presented by the Appellant’s witness Mark Alkerstone.

#### CHARACTER DESCRIPTION: NATIONAL CHARACTER AREAS

6.3.17 The site lies within the Dorset Heaths National Character Area (NCA 135). Key characteristics of the Dorset Heaths NCA include:

- *The landscape is predominantly of low relief. In places erosion has left incised but shallow valleys, now dry or holding small watercourses, sometimes with associated mires.*
- *There are large tracts of gently undulating, less-fertile marginal land dominated by conifer plantations or by heathlands of international importance (Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar site) for populations of nightjar, woodlark, Dartford warbler, sand lizard, smooth snake and Dorset heath, as well as a rich assemblage of heathland and mire invertebrates and lower plants.*
- *Soils are predominantly sandy, susceptible to erosion and relatively unproductive. Agriculture is generally pasture, with fields bounded by hedgerows or fences. There is some arable cropping, especially maize.*
- *Settlement is mostly sparse, with historic settlements generally associated with the rivers or harbourside...*
- *The heathlands can provide a real sense of remoteness combined with bleakness or tranquillity, depending on the weather.’*

6.3.18 These described characteristics are unaffected by the proposed development

#### *Character description: Rempstone Wooded Pasture LCA*

6.3.19 The Rempstone Wooded Pasture LCA lies approximately 0.7km to the south of the site. Landscape guidelines for this LCA that are relevant to the Proposal include:

- *Protect important views of the surrounding open heathlands and views towards the Purbeck Ridge.*

6.3.20 In respect of the Policy to '*Protect important views of the surrounding open heathlands and views towards the Purbeck Ridge*' the LVIA describes the effect of the proposed development upon views experienced as part of the wider landscape, especially those from higher ground to the south. The LVIA assesses that the effect will be an improvement to the views when compared to the baseline condition.

*Character description: Purbeck Ridge LCA*

6.3.21 The Purbeck Ridge LCA lies approximately 1.2km to the south of the site. Landscape guidelines for this LCA that are relevant to the Proposal include:

- *Protect and enhance important views to and from the ridge/escarpment.*

6.3.22 In respect of the Policy to '*Protect and enhance important views to and from the ridge/escarpment*' the LVIA describes the effect of the proposed development upon views experienced as part of the wider landscape, especially those from higher ground to the south. The LVIA assesses that the effect will be an improvement to the views when compared to the baseline condition.

*Character description: Dorset Coast Seascape Character Types*

6.3.23 The coastal environment in the wider area to the east, north-east and south-east of the site includes several seascape character types (SCTs) and LCTs, as described in Dorset Coast, Landscape & Seascape Character Assessment (LDA Design, 2010).

6.3.24 The Sandy Beach SCT extends around the coastline to the east and north-east of the site at an approximate minimum distance of 0.4km from the site. Key characteristics of this SCT that are relevant to the Proposal include:

- *Predominantly sandy beaches generally not associated with extensive sand dune systems, except at Studland.*
- *Important recreational beaches for passive recreation, swimming and watersports.*

6.3.25 These described characteristics are unaffected by the proposed development

6.3.26 The Hard Rock Cliffs SCT extends around the coastline to the south-east of the site at an approximate minimum distance of 1.4km from the site. Key characteristics of this SCT that are relevant to the Proposal include:

- *Hard cliffs generally of sandstone, chalk and limestone with vertical or near vertical faces and ledges, often dramatic, with pinnacles and pillars;*
- *Often highly visible from long distances due to height and colour;*
- *Clifftops provide significant panoramic views especially when associated with high points.*

6.3.27 These described characteristics are unaffected by the proposed development

#### 6.4 Summary assessment of impacts upon landscape character in response to Dorset Council's Statement of Case Paragraph 6.8

6.4.1 The LVIA considered predicted effects upon landscape character and visual receptors within the study area. The area is highly designated and popular with visitors pre-occupied with enjoyment of the scenery. Nearly all sensitivity values are high.

6.4.2 For landscape character this means assessment of the predicted effects upon the described landscape character, landscape designations, and particularly the special qualities of the Dorset AONB.

6.4.3 The proposal involves changing one complex of buildings for another within the same site boundary. No changes are proposed to land outside the existing site which will remain as the baseline condition.

6.4.4 The latest proposal benefits from consultee feedback on an earlier application which was refused in 2019. This has enabled a detailed iterative design response to the site and its surroundings resulting in a wholesale re-design for the site to reduce adverse effects which were identified as major shortcomings in the previous scheme.

6.4.5 The tables below are extracted from Richard Sneesby Landscape Architects in-house LVIA methodology. The values attached to the landscape are outlined in the tables below in red. The LVIA does not shy away from the value of the host landscape and its sensitivity to change. The host landscape has a High value at a national level and High/Medium at regional and local level with the High national level value surpassing the regional value.

**Table 1 – Value assigned to landscape receptors with designations**

| <b>Type and Name of designation</b>   | <b>Description of designation</b>   | <b>Value</b>   |
|---|---|--|
| <b>International designation</b><br>World Heritage Site (WHS)   | A natural or man-made site or area recognized as being of outstanding international   | <b>Very high</b> due to their international importance                                 |
| <b>National landscape designation</b><br>National Park, Heritage Coasts and The Broads, Area of Outstanding Natural Beauty (AONB).  | Areas by virtue of their attractive landscape have national importance and typically benefit from settings of high landscape quality.                                 | <b>High</b> due to their national importance   |
| <b>National heritage designation or registration</b><br>The setting and extents of Scheduled Monuments, Listed Buildings and Structures, Registered Historic Parklands and Gardens, Ancient Woodlands | Assets and their settings or curtilage that have cultural or natural links to the landscape.  | <b>High</b> due to their national importance   |
| <b>Experiential classified landscapes</b><br>Identified Dark Sky Areas and CPRE and CPRW areas of high tranquillity and wildness.   | Landscape areas that have been mapped and defined for the quality of the experience that they evoke.  | <b>High / Medium</b> due to their national and regional importance                     |
| <b>Regional landscape designations</b><br>Special Landscape Area (SLA), Areas of Special County Value (ASCV) and similar titled areas.  | Areas designated at a county or local level on the basis of the quality of the landscape to the region or local authority area.                                       | <b>High / Medium</b> due to their regional and local importance                        |
| <b>Regional heritage designation</b><br>Conservation Area / Area of Archaeological Interest   | Areas designated at a regional or local level on the basis of the heritage importance including matters of setting and views.   | <b>High / Medium</b> due to their regional and local importance                        |
| <b>Local landscape designations</b><br>Public Open Space, Green or Blue Infrastructure, Areas of Local Landscape Importance, Tree Preservation Order and Ancient Hedgerow.                            | Area designated at a local level to reflect the importance of a landscape, area or features within it at a local level.   | <b>High / Medium / Low</b> depending on their assessed importance within the locality. |
| <b>No formal designation or registration</b>  | The lack of a formal designation does not immediately make the value of the landscape or feature low as local importance has to be judged in the assessment of value. | <b>High / Medium / Low</b> depending on their assessed importance within the locality. |

6.4.6 The LVIA summarises the sensitivity of the assessed landscape against each landscape type with High sensitivity values for all landscape types.

### Summary of the Sensitivity of Assessed Landscape Units

| Landscape                                  | Value  | Susceptibility | Sensitivity    |
|--|--|----------------|----------------|
| The Site                                   | Medium to high                                     | Medium to high | Medium to high |
| Purbeck Heaths LCA (host)                  | High   | Medium to high | High           |
| Purbeck Ridge LCA                          | High   | High           | High           |
| Active Coastal Waters and Sandy Beach SCTs | High   | Medium to high | High           |
| Rolling Wooded Pasture LCT                 | Not assessed due to likely limited intervisibility |                |                |
| Hard Rock Cliffs SCT                       |  |                |                |

6.4.7 Replacing the existing buildings with new architecture and the effects this will have upon the site designations is described in Sections 6.129 – 6.137. The descriptions are summarised in tabulated form as follows:

| Assessment of the effect of building elevations and materiality   |                 |                    |
|---|-----------------|--------------------|
| Landscape sensitivity   | <b>High</b>     |                    |
| Magnitude of effect   | <b>Moderate</b> |                    |
| Significance of effect  | <b>Moderate</b> | <b>Not adverse</b> |
| Recommended mitigation measures to reduce any adverse effects   |                 |                    |
| Visual effects are assessed later in this chapter.<br>The effect of the proposed buildings, developed through a detailed iterative design process and including inherent mitigation, is not assessed as requiring specific mitigation measures. |                 |                    |

| Assessment of the World Heritage Site designation  |                   |                    |
|--|-------------------|--------------------|
| Landscape sensitivity  | <b>Very High</b>  |                    |
| Magnitude of effect  | <b>Negligible</b> |                    |
| Significance of effect   | <b>Slight</b>     | <b>Not adverse</b> |
| Recommended mitigation measures to reduce any adverse effects  |                   |                    |
| No adverse effects upon the World Heritage Site (WHS) designation were found. The development replaces one form of architecture with another within the site boundary with no change from the baseline condition. The potential interconnection between the site and the WHS (restricted to a short section of coastline close to Old Harry Rocks) is visual with no adverse effect upon the designated characteristics. No further mitigation measures are recommended. |                   |                    |

| Assessment of the effect of the proposal upon seascape characteristics  |                           |                    |
|---|---------------------------|--------------------|
| Landscape sensitivity   | <b>High</b>               |                    |
| Magnitude of effect   | <b>Minor</b>              |                    |
| Significance of effect  | <b>Slight to Moderate</b> | <b>Not adverse</b> |
| Recommended mitigation measures to reduce any adverse effects   |                           |                    |
| The hotel site is set back from the coastline in a slightly elevated position relative to the shoreline. The development replaces one form of architecture with another within the site boundary with no change from the baseline condition. The potential interconnection between the site and the sea and shoreline is visual and receptors will be able to view the development from recreational boats and cross-channel ferries. It is assessed that changes to the site will not adversely affect the seascape characteristics. No further mitigation measures are recommended. |                           |                    |

| Assessment of the effect of the proposal upon tranquillity and remoteness   |                           |                    |
|---|---------------------------|--------------------|
| Landscape sensitivity   | <b>High</b>               |                    |
| Magnitude of effect   | <b>Minor</b>              |                    |
| Significance of effect  | <b>Slight to Moderate</b> | <b>Not adverse</b> |
| Recommended mitigation measures to reduce any adverse effects   |                           |                    |
| The development replaces one form of architecture with another within the site boundary. The use will be similar, albeit with higher visitor numbers and popularity of the hotel more likely throughout the year possibly extending the tourist season. The inherent design measures which have adopted a landscape strategy to make the site more open, and with a focus on open landscape within the site and which will encourage more passive outdoor recreational activities, means that the site should not change perceptions of tranquillity and remoteness compared to the baseline condition. No further mitigation measures are recommended. |                           |                    |

## 6.5 Dorset Council’s Statement of Case Paragraph 6.9

6.5.1 Paragraph 6.9 continues that “*Since the proposal does not conserve and enhance the landscape and scenic beauty of the area, for the avoidance of doubt it follows that it does not positively integrate with its surroundings and is therefore contrary to Policy E12 on this basis as well.*”

6.5.2 Policy E12 (Design) states:

*“The Council will expect proposals for all development and other works to demonstrate a high quality of design that: (relevant clauses included only)*

- a. positively integrates with their surroundings;*
- b. reflects the diverse but localised traditions of building materials found across Purbeck;*
- f. supports biodiversity through sensitive landscaping and in-built features;*
- h. supports the efficient use of land taking account of capacity in existing infrastructure and services, access to sustainable means of transport, the local area's prevailing character and the requirement to deliver high quality buildings and places; and*
- i. provides buildings which are accessible to all”.*

6.5.3 The council has offered no consideration of the condition of the site as it is now, and has offered no analysis of the effect that the existing hotel is having upon the AONB designation, landscape character or visual receptors. The existing hotel complex is in poor condition and its replacement is not in question. In contrast, the LVIA has undertaken a detailed analysis and assessment considering matters of site design, architectural style, scale, massing, and materiality. In all cases it is assessed that the Proposal will provide (post construction phase) a short, medium, and long-term benefit to the landscape compared to the existing baseline condition.

6.5.4 The table below outlines a comparison between the baseline condition and the proposed development when assessed against the above statements within Policy E12.

| <i>Policy E12 criteria</i>  | <i>Baseline condition</i>  | <i>Proposed development</i>   |
|---|--|---|
| <i>a. positively integrates with their surroundings;</i>  | NO. Apart from the original historic eastern façade, the existing development is randomly and incrementally unplanned and is incongruous with its surroundings.  | YES. A well-planned coherent development better integrates with its surroundings and provides an open landscaped courtyard with strong visual and biodiversity connections to its surroundings.                         |
| <i>b. reflects the diverse but localised traditions of building materials found across Purbeck;</i> | PARTIALLY. The historic eastern façade is well known locally and would be considered part of the local early 20 <sup>th</sup> century vernacular. All other buildings are constructed using non-vernacular styles and methods. | PARTIALLY. The proposed development retains the main historic façade and changes the built form elsewhere into a coherent collection of buildings using traditional and re-imagined architectural styles and materials. |
| <i>f. supports biodiversity through sensitive landscaping and in-built features;</i>                | NO. The existing site, excepting the contribution made by the trees, is not valued for its biodiversity.   | YES. The proposed development includes substantial areas of biodiversity enhancements and new tree planting.  |

|   |   |   |
|---|---|---|
| <p><i>h. supports the efficient use of land taking account of capacity in existing infrastructure and services, access to sustainable means of transport, the local area's prevailing character and the requirement to deliver high quality buildings and places; and</i></p> | <p>HOTEL CONTAINED WITHIN THE OWNERSHIP BOUNDARIES. Poor quality buildings with low energy efficiency and excepting the eastern façade, out of character with its surroundings.</p> | <p>HOTEL CONTAINED WITHIN THE OWNERSHIP BOUNDARIES. High quality sustainable buildings, retaining the eastern façade and with no change to the site boundary.</p> |
| <p><i>i. provides buildings which are accessible to all”.</i></p>   | <p>PARTIALLY. Mid-late 20<sup>th</sup> century buildings were not designed for accessible access. Retro-fit solutions have been put in place where possible.</p>                    | <p>YES. A fully accessible development to current design standards.</p>   |

6.5.5 The table above shows how the proposed development will result in an overall betterment of the site, tested against Policy E12, when compared with the baseline condition.

6.5.6 In Sections 6.156 - 6.192 the LVIA summarises the significance of effect upon landscape character arising from the development’s height, scale, massing and as between slight and moderate and not adverse. The conclusion is that “Moderate: These beneficial or adverse effects may be important but are not likely to be key decision-making factors. The cumulative effects of such issues may become a decision-making issue if leading to an increase in the overall adverse effect on a particular resource or receptor”. And “Slight: These beneficial or adverse effects may be raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project”. These assessment descriptions are expanded below by



including reference to our (Richard Sneesby Landscape Architects) methodology which is abbreviated in the ES.

#### LVIA ASSESSMENT OF EFFECTS UPON LANDSCAPE CHARACTER

- 6.5.7 The development proposal replaces an existing hotel. The existing baseline condition of the Hotel and grounds to the west of Ferry Road is in poor condition. Incremental and unplanned random additions to the hotel buildings and its associated infrastructure in the second half of the 20<sup>th</sup> century has led to a complex which is inherently harmful to the landscape character visual receptors. The LVIA Assessment (CD1.59) of the effect of the baseline development without the works is described in Sections 6.97-6.109.
- 6.5.8 A landscape-led approach has sought to result in the reduction of baseline harmful effects upon the AONB designation.
- 6.5.9 No development is proposed outside the existing hotel boundary and there will be no changes to the physical landscape beyond the red line boundary. This means that landscape and visual matters can focus upon effects upon the published described landscape characteristics of the landscape designations, character area descriptions for the wider host landscape and effects upon visual receptors.
- 6.5.10 The LVIA has considered the susceptibility of the landscape to accommodate change. Judgements on susceptibility are presented in a three-point scale of Low, Medium or High with definitions for each of these grades presented in Table 2 below. The assessment found the landscape to have a Medium susceptibility to change.

**Table 2 – Definitions of landscape susceptibility**

| <b>Scale</b> | <b>Description of susceptibility</b>  |
|--------------|---|
| High         | Little or no ability to accommodate the proposed development without adverse consequences for the retention of the existing landscape baseline or the delivery of landscape planning policies and strategies. |
| Medium       | Some ability to accommodate the proposed development without adverse consequences for the retention of the existing landscape baseline or the delivery of landscape planning policies and strategies          |
| Low          | An ability to accommodate the proposed development without adverse consequences for the retention of the existing landscape baseline or the delivery of landscape planning policies and strategies            |

- 6.5.11 The LVIA assessed the magnitude of change leading to an overall assessment of significance of impact.

**Table 4 – Description of magnitude categories for landscape effects**

|            |   |
|------------|---|
| Major      | Loss of resource and/or quality and integrity: severe damage to key characteristics, features, or elements (Adverse)<br>Large scale or major improvement of resource quality: extensive restoration or enhancement: major improvement of attribute quality (Beneficial).<br>The Development would result in a substantial alteration to key landscape character or characteristics of the receptor.   |
| Moderate   | Loss of resource, but not adversely affecting integrity: Partial loss of/damage to key characteristics, features, or elements (Adverse)<br>Benefit to, or addition of, key characteristics, features, or elements: improvement of attribute quality (Beneficial).<br>The Development would result in a partial loss of or alteration to key landscape character or characteristics of the receptor.   |
| Minor      | Some measurable change in attribute's quality or vulnerability: minor loss of, or alteration to, one (or maybe more) key characteristics, features, or elements (Adverse)<br>Minor benefit to, or addition of, on (or maybe more) key characteristics, features, or elements: some beneficial impact on attribute or a reduced risk of negative impact occurring (Beneficial).<br>The Development would result in a minor alteration to landscape character or characteristics of the receptor. |
| Negligible | Very minor loss or detrimental alteration to one or more characteristics, features, or elements (Adverse)<br>Very minor benefit to or positive addition of one or more characteristics, features, or elements (Beneficial).<br>The Development would result in a negligible alteration to landscape character or characteristics of the receptor or below perceived levels of change.   |
| None       | No loss or alteration to characteristics, features, or elements: no observable impact in either direction.<br>The Development would not change the landscape character or characteristics of the receptor.  |

6.5.12 A comparison between the baseline condition and the proposed development is summarised below:

| <i>Criteria</i>          | <i>Baseline condition</i> | <i>Proposed development</i>                      |
|--------------------------|---------------------------|--|
| Landscape value          | High                      | High   |
| Landscape susceptibility | Medium                    | N/A  |
| Landscape sensitivity    | High                      | High   |
| Magnitude of development | N/A                       | Major/Moderate                                   |
| Significance of impact   | Moderate (adverse)        | Moderate/Slight (beneficial)<br>Slight (adverse) |

6.5.13 The LVIA concluded that the development would have an effect upon the landscape character in the range Moderate Beneficial, Slight Beneficial and Slight Adverse. The Slight Adverse assessment is for the effect of the proposal along its southern boundary where the site meets the surrounding landscape. The slight adverse effect created by the height of the building at the western side of the site which will be a change from the baseline condition of lower-level buildings and, in the short term, be more dominant when experienced from land immediately south of the site. Mitigation measures will, within 10 years reduce this effect to Slight and not adverse.

**Table 7 – Definitions of the significance ratings for landscape effects**

**VERY LARGE** – a Very Large significance of effect is rarely assessed. The development would result in a total alteration to the landscape character of an area. Only adverse effects are normally assigned this level of significance. They represent key factors in the decision-making process. These effects are generally, but not exclusively, associated with sites or features of international, national, or regional importance that are likely to suffer a most damaging impact and loss of resource integrity. However, a major change in a site or feature of local importance may also enter this category.

| <b>Rating</b>  | <b>Description of rating</b>  |
|--|---|
| <b>Large (rarely very large) beneficial landscape effect</b> | These beneficial or adverse effects are considered to be very important considerations and are likely to be material in the decision-making process.<br>The proposals will result in a large positive change in the key characteristics of the landscape receptor arising from either large-scale improvement or introduction of extensive new positive elements to it to improve the notably improve its quality and integrity as a landscape receptor. The proposals may also be in full compliance adopted planning objectives for the landscape.  |
| <b>Moderate beneficial landscape effect</b>                  | These beneficial or adverse effects may be important but are not likely to be key decision-making factors. The cumulative effects of such issues may become a decision-making issue if leading to an increase in the overall beneficial effect on a particular resource or receptor. The proposals will result in a positive partial change in the key characteristics of the landscape receptor arising from either their partial addition or improvement in quality or introduction of some positive elements to it to moderately improve the quality and integrity of the landscape receptor. The proposals may also comply with adopted planning objectives for the landscape.      |
| <b>Slight beneficial landscape effect</b>                    | These beneficial effects may be raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project. The proposals will result in small positive change(s) in the character of the landscape receptor that is noticeable but does not alter its key characteristics. The change will arise from the addition or improvement of a small part of the receptor or through the introduction of some positive landscape elements to it to improve its integrity as a landscape receptor in a small way. The proposals may also be partly comply with adopted planning objectives for the landscape. |
| <b>Negligible landscape effect</b>                           | A neutral effect is one that has both beneficial and adverse in equal degrees and the two effects cancel each other out leaving a changed landscape receptor but one with equal quality.  |

|   |   |
|---|---|
| <b>No landscape effect</b>                                | No effects or those that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error. There is no apparent landscape effect on the receptor.  |
| <b>Slight adverse landscape effect</b>                    | These adverse effects may be raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project. The proposals will result in small negative change(s) in the character of the landscape receptor that is noticeable but does not affect its key characteristics. The change will arise from the loss or reduction of a small part of the receptor or through the introduction of some negative elements to it to reduce its integrity as a landscape receptor in a small way. The proposals may also be partly in conflict with adopted planning objectives for the landscape. |
| <b>Moderate adverse landscape effect</b>                  | These adverse effects may be important but are not likely to be key decision-making factors. The cumulative effects of such issues may become a decision-making issue if leading to an increase in the overall adverse effect on a particular resource or receptor. The proposals will result in a partial change in the key characteristics of the landscape receptor arising from either their partial loss, reduction or introduction of some uncharacteristic elements to it to moderately reduce or degrade the integrity of the landscape receptor. The proposals may also be partly in conflict with adopted planning objectives for the landscape.                |
| <b>Large (rarely very large) adverse landscape effect</b> | These adverse effects are considered to be very important considerations and are likely to be material in the decision-making process. The proposals will result in a large negative change in the key characteristics of the landscape receptor arising from either their loss, reduction or introduction of uncharacteristic elements to it to destroy it or seriously degrade the integrity of the landscape receptor. The proposals may also conflict with adopted planning objectives for the landscape.   |

**Table 6 - Valency of effect upon landscape character definitions**

| <b>Nature of Effect</b> | <b>Definition</b>  |
|-------------------------|--|
| Beneficial              | Effect that would result in improvement to the condition, integrity or key characteristics of the landscape or visual resource   |
| Neutral/<br>Not adverse | Effect that would maintain, on balance, the existing level of condition, integrity or key characteristics of the landscape or visual resource. Whilst the nature of the change may be significant, the proposal does not compromise the inherent qualities of the resource and can incorporate a combination of positive and negative effects. |
| Adverse                 | Effect that would result in damage to the condition, integrity or key characteristics of the landscape or visual resource  |

6.5.14 The LVIA contends that a change in architectural style is not inherently harmful. Indeed, many aspects of the new proposals are beneficial to the landscape character and its visual presence when viewed from the wider landscape when compared with the baseline condition.

## 6.6 Dorset Council's Statement of Case Paragraphs 6.10 and 6.12

### 6.6.1 Both 6.10 and 6.12 deal with the visual effects of the proposal

Paragraph 6.10 states “*The Appellant contends, at Para 7.10 of their Statement of Case, that the majority of visual receptors are distant and the effects upon them are largely either not adverse or beneficial. The Appellant further contends, at para 7.11 that the development ‘has been designed to be more visually recessive in the landscape than the existing baseline situation’. The Council disagrees with these assertions*”.

Paragraph 6.12 states “*The proposal also adversely affects the visual quality of the area. It is visible from a number of visual receptors including the publicly accessible heathland to the west and from various rights of way*”.

6.6.2 Particular sensitivity to development on this site comes from its visibility from the south. 14 viewpoints were assessed from the north, south and west. Those close to the site (Ferry Road and the footpaths and bridleways immediately south of the site) will notice a moderate to large change to the view. This is assessed as beneficial compared to the baseline condition.

6.6.3 The council has exaggerated the visual influence of the hotel, both existing and proposed, when viewed from more distant viewpoints south of the site, namely Godlingston Heath, higher ground above Agglestone Rock and from Black Down Mound, where the site is visible as a minor element within wide panoramic views. The council also fails to recognise that most of the buildings are, and will continue to be, screened by woodland from westerly and south-westerly directions. The most visible part of the site is along its southern boundary where the appellant has paid close attention to the effects upon visual receptors. From these viewpoints, the site design and architecture significantly reduce the adverse effects of the baseline view.

6.6.4 In order to interrogate the visual change to the views experienced by receptors at key viewpoints (VPs 5b, 6, 7b, 8 & 9), 5 photomontage studies were modelled by AWW Architects (CD2.27). These ‘before and after’ visualisations assisted the LVIA and were influential in the summary assessments of visual effects. The photomontage studies included in the core documents are to viewed at A3 size and show a small part of wider panoramic views. I have produced full-scale panoramas, including the A3 image, at a larger paper size (A0) without changing the scale or viewing angle as evidence at the inquiry. These are incorporated at CD10.007 to CD10.011

6.6.5 It must be acknowledged that the majority of the viewpoints are at distance (over 750m) and that more distant views are from locations where Knoll House Hotel appears as a small element within a wider panoramic view. It should further be acknowledged that the proposed scheme appears less apparent within these longer-distance than the baseline condition (see photomontage views). The LVIA assessments of significance are based upon the appearance of the application site within these wider views. It should be further acknowledged that, apart from

the locations illustrated from the representative viewpoints, views towards Knoll House Hotel are relatively hard to find.

- 6.6.6 Very high ratings are for large developments of national significance – for example a large wind farm, solar farm or power station. In the case of Knoll House Hotel, the proposals replace one form of development with another within the same site boundary. In non-designated landscapes the sensitivity would be Medium. The AONB designation elevates this to High. Comments upon the scale and massing of the proposed development have been addressed in the updated DAS Addendum (CD2.014) which includes detailed analysis of the current amended proposal which reduces the height of the development from 4 to 3 storeys.
- 6.6.7 The LVIA includes detailed consideration of the effect of the proposal upon visual receptors from all reported viewpoints and a developed narrative which considered the change from one style of architecture to another and the scale and massing of the proposal. The majority of this area of reporting is contained in Sections 6.199 – 6.259 of the Environmental Statement (ES) (CD1.059).
- 6.6.8 From the wider landscape (viewpoints beyond 775m from the site boundary which covers all viewpoints except VP1, VP 2a, VP2b and VP2c) the change to views experienced by visual receptors are all assessed as either slight (not adverse) or moderate to large (beneficial). The LVIA describes the effect at each viewpoint recognising that the change will be apparent, but at such distance to be only a slight change to the view. Where the assessment concludes that the effect will be beneficial the LVIA describes how the proposed building will appear to be more visually recessive in the landscape compared with the baseline situation.
- 6.6.9 In order to assess the effect of the proposal upon visual receptors and landscape character, inevitably the LVIA favoured views of Knoll House where it is visible. In reality the buildings are either not seen or very hard to find from the surrounding countryside. The viewpoints included, while representative of the effect upon visual receptors from selected locations (from where it can be seen), are not representative of the visibility of Knoll House from the surrounding area (from where it can't be seen). In this way the LVIA skews the assessment to being over-reported rather than under-reported compared to the reality of any visual change experienced from the surrounding area.
- 6.6.10 The tables below summarise the LVIA assessments and provide a narrative description of the assessment values which are highlighted in red. The LVIA finds the effect upon visual receptors to be in the range Moderate/Large Beneficial to Slight Not adverse. The beneficial effects arise from a comparison with the baseline condition which would be assessed as in the range Moderate/Large Adverse through Slight Adverse and Slight not adverse. The LVIA concludes that

overall, the effect upon visual receptors will result in a reduction of impact when compared with the baseline condition.

6.6.11 It must be noted that, in the absence of an existing baseline development, an LVIA would assess the effects upon visual receptors significantly differently. A new development in this landscape where no previous development was present would, most likely lead to a range of adverse effects with most in the range Large, Moderate.

6.6.12 The nature of the proposal as a replacement development, and one that is inherently incongruous in this landscape, gives rise to a valency value of **not adverse**. This is intentional and distinguishes between adverse, neutral and beneficial by focusing upon the real and perceived extent of change and how this will be received by people viewing the site post development. ‘Not adverse’ effects can be assessed as Large, Moderate, Slight or Negligible following the general criteria in assessment tables in respect of degrees of change, massing, scale, pattern and new features, but without reference to significant negative or positive effects. These are effects that would maintain, on balance, the existing level of condition, integrity or key characteristics of the landscape or visual resource. Whilst the nature of the change may be significant, the proposal does not compromise the inherent qualities of the visual resource and can incorporate a combination of positive and negative effects without causing harm.

**Table 8 – Value assessment of views and visual amenity**

| <b>Value</b> | <b>Indicative description</b>   |
|--------------|---|
| High         | Views from and visual amenity associated with viewpoints of regional or national importance, popular visitor attractions where views and visual amenity form a key part of the attraction or route. Inclusion within guidebooks or cultural references such as painting and poetry or as part of heritage character. Views from areas with national designations such as National Parks and National Landscapes (Areas of Outstanding Natural Beauty/AONB) or regional or local landscape designations such as Special Landscape Areas or equivalent. |
| Medium       | Views from and visual amenity associated with viewpoints of district or local importance, local visitor attractions or public open space and routes where views and visual amenity form an integral part of the attraction. Views from regional or local landscape designations such as Special Landscape Areas or equivalent.  |
| Low          | Views from and visual amenity associated with every-day locations or routes that do not benefit from any designation or cultural associations.  |

**Table 9 – Definitions of visual susceptibility**

| <b>Scale</b> | <b>Description of susceptibility</b>  |
|--------------|---|
| High         | Little or no ability to accommodate the change caused by the proposed development without adverse consequences for the receptor groups experiencing the view and/or general visual amenity. |

|        |   |
|--------|---|
|        | Typical receptors being residents at home, outdoor recreation groups whose attention is on the view e.g. walkers, visitors to heritage attractions, public park users, wider communities where setting of an area contributes to general visual amenity, travelers on recognised scenic routes.                                   |
| Medium | Some ability to accommodate the proposed development with some adverse consequences for the receptor groups experiencing the view and/or general visual amenity.<br>Typical receptors include users of transport routes and areas of outdoor recreation where the view is not the primary focus of attention e.g. sports pitches. |
| Low    | An ability to accommodate the proposed development without notable adverse consequences for the receptor groups experiencing the view and/or general visual amenity.<br>Typical receptor groups include people at work or going about business that is not focusing on views or general visual amenity.                           |

**Table 10 – Description of grades of visual sensitivity**

| <b>Grade description</b>   | <b>Typical indicators of sensitivity</b>  |
|--|---|
| <p><b>High</b><br/>A highly attractive view or visual amenity area with an obvious attraction and general lack of distracting or negative features.</p>            | <ul style="list-style-type: none"> <li>• Highly valued for its scenic quality.</li> <li>• Low tolerance to the type of proposed development.</li> <li>• Designed landscape of historical importance.</li> <li>• Other strong cultural or heritage associations.</li> <li>• Focus of a recreational resource.</li> <li>• Views and visual amenity that cannot be readily replaced.</li> <li>• Possibly benefitting from a national, regional or local landscape or heritage designation.</li> </ul>                                  |
| <p><b>Medium</b><br/>An attractive view or visual amenity area with an obvious attraction and general lack of distracting or negative features.</p>                | <ul style="list-style-type: none"> <li>• Some scenic quality but also some less scenic elements.</li> <li>• Some tolerance to the type of proposed development.</li> <li>• A recognisable area or piece of designed landscape.</li> <li>• Possible cultural or heritage associations.</li> <li>• Some appreciation as a recreational resource.</li> <li>• Views and visual amenity that could be recreated with some effort.</li> <li>• Possibly benefitting from a regional or local landscape or heritage designation.</li> </ul> |
| <p><b>Low</b><br/>An ordinary view with no differentiating character or an area with no increased visual amenity and general lack of positive visual features.</p> | <ul style="list-style-type: none"> <li>• Limited or no particular scenic quality or elements.</li> <li>• Tolerance to the type of proposed development.</li> <li>• Not a recognisable designed landscape.</li> <li>• No known cultural or heritage associations.</li> <li>• No obvious appreciation as a recreational resource.</li> <li>• Views and visual amenity that could be readily replaced or recreated.</li> <li>• Unlikely to hold any landscape or heritage designations.</li> </ul>                                     |

**Table 12 – Description of magnitude categories for visual effects**

|       |  |
|-------|--|
| Major | A total or major alteration to key elements, features, or characteristics of the view, such that post development the baseline situation will be fundamentally changed. The development would result in a substantial alteration to the identified view or visual amenity of an area, largely affect key visual features in the view or introduce new prominent features within the scene or alter the general composition or character of the view. |
|-------|--|



|          |  |
|----------|--|
| Moderate | A partial alteration to key elements, features, or characteristics of the view, such that post development the baseline situation will be noticeably changed. The development would result in a partial alteration to the identified view or visual amenity of an area, moderately affect key visual features in the view or introduce new notable features within the scene or alter some part of the composition or character of the view. |
|----------|--|

|            |  |
|------------|--|
| Minor      | A minor alteration to key elements, features, or characteristics of the view, such that post development the baseline situation will be largely unchanged despite discernible differences. The development would result in a minor alteration to the identified view or visual amenity of an area, may affect key visual features in the view or introduce new features within the scene or alter some small part of the composition or character of the view.                           |
| Negligible | A very minor alteration to key elements, features, or characteristics of the view, such that post development the baseline situation will be fundamentally unchanged with barely perceptible differences. The development would result in a negligible alteration to the identified view or visual amenity of an area and is unlikely to affect key visual features in the view or introduce visible new features within the scene which would visually read as discernible differences. |
| None       | No change from the baseline condition. The development would not change the appearance or characteristics of the view or an area's visual amenity.   |

6.6.13 The table below provides narrative descriptions of the assessed visual effects with each viewpoint identified against the relevant significance criteria.

**Table 13 – Narrative descriptions of visual effects**

**VERY LARGE** – a Very Large significance of effect upon visual receptors is rarely assessed. The development would result in a total alteration to the identified view or visual amenity of an area with very large affects upon key visual features in the view or the introduction of new prominent features within the scene or alterations to the general composition or character of the view. Only adverse effects are normally assigned this level of significance. They represent key factors in the decision-making process. These effects are generally, but not exclusively, associated with sites or features of international, national, or regional importance that are likely to suffer a most damaging impact and loss of resource integrity. However, a major change in a site or feature of local importance may also enter this category.

| <b>Category</b>   | <b>Description</b>  | <b>Viewpoints assessed in this category</b> |
|---|---|---|
| <b>Large (rarely very large) adverse visual effects</b> | The development would result in a substantial alterations to the identified view or visual amenity of an area with large affects upon key visual features in the view or the introduction of new notable features within the scene or alterations to some part of the composition or character of the view. These adverse effects are considered to be very important considerations and are likely to be material in the decision-making process.<br><br>The proposals will result in a substantial change in the key characteristics of the view or an area's visual amenity or will introduce elements uncharacteristic to the qualities |   |

|  |  |  |
|--|--|--|
|  | <p>of the scene such as scale, pattern; and/or the proposals may destroy or permanently degrade the qualities of the visual character; and/or the proposals and resulting effects are in large part in conflict with landscape planning objectives and/or result in a substantial or total loss, or alteration of key elements, features or notable characteristics in the view.</p>   |  |
| <b>Moderate adverse visual effects</b>   | <p>The development would result in a moderate alteration to the identified view or visual amenity of an area and may affect key visual features in the view or introduce new features within the scene or alter some small part of the composition or character of the view. These adverse effects may be important but are not likely to be key decision-making factors. The cumulative effects of such issues may become a decision-making issue if leading to an increase in the overall adverse effect on a particular resource or receptor.</p> <p>The proposals will result in a part change in the key characteristics of the view or an area's visual amenity or will introduce elements partly uncharacteristic to the qualities of the scene such as scale, pattern and some inappropriate features; and/or the proposals will notably reduce or degrade the integrity of the view or visual amenity; and/or the proposals and resulting effects are in some part in conflict with landscape planning objectives and/or result in a part loss, or alteration of key elements, features or notable characteristics in the view.</p> |  |
| <b>Slight adverse visual effects</b>     | <p>The development would result in a slight alteration to the identified view or visual amenity of an area with minor changes to key visual features in the view. These adverse effects may be raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project.</p> <p>The proposals will result in some small change in the key characteristics of the view or will introduce elements largely characteristic to the qualities of the existing scene such as massing, scale, pattern and some small inappropriate features; and/or the proposals will marginally reduce or degrade the integrity of view or visual amenity; and/or the proposals and resulting effects are in some small part in conflict with landscape planning objectives and/or result in a small loss, or negative alteration of key elements, features or characteristics in the view.</p>   |  |
| <b>Negligible adverse visual effects</b> | <p>The proposals will result in a some very small negative change in the key characteristics of the view or will introduce elements characteristic to the qualities of the existing scene such as massing, scale, pattern and features that can be considered inappropriate; and/or the proposals will very slightly reduce or degrade the integrity of view or visual amenity in a barely perceptible way; and/or the proposals and resulting effects are in some very small part in conflict with landscape planning objectives and/or result in a very small loss, or alteration</p>  |  |

|   |   |  |
|---|---|--|
|   | of elements, features or characteristics that is perceivable but not necessarily obvious.   |  |
| <b>Not adverse</b>                        | These effects should be assessed as Large, Moderate, Slight or Negligible following the general criteria in this table in respect of degrees of change, massing, scale, pattern and new features, but without reference to significant negative or positive effects. These are effects that would maintain, on balance, the existing level of condition, integrity or key characteristics of the landscape or visual resource. Whilst the nature of the change may be significant, the proposal does not compromise the inherent qualities of the visual resource and can incorporate a combination of positive and negative effects.   | VP1 Slight<br>VP3 Slight<br>VP4 Slight<br>VP8 Slight |
| <b>No visual effects</b>                  | The development would not change the appearance or characteristics of the view or an area's visual amenity or may result in changes that are beneath levels of perception, within normal bounds of variation or within the margin of forecasting error.<br><br>The proposals will result in no adverse or positive change in the key characteristics of view or visual amenity nor will it introduce any uncharacteristic elements to the view or visual amenity and/or the proposals will neither reduce or improve the integrity of view or visual amenity in a perceptible way; and/or the proposals and resulting effects neither conflict or contribute with landscape planning objectives and/or result in any alteration of key elements, features or notable characteristics of the view or visual amenity. | VP11b  |
| <b>Negligible positive visual effects</b> | The proposals will result in a some very small positive change in the key characteristics of the view or visual amenity or will introduce elements characteristic to the qualities of the existing view or visual amenity such as massing, scale, pattern and features that can be considered appropriate; and/or the proposals will very slightly improve or enhance the integrity of visual character in a barely perceptible way; and/or the proposals and resulting effects are in some very small part in compliance with landscape planning objectives and/or result in a very small gain, or positive alteration of key elements, features or notable visual characteristics that is perceivable but not necessarily obvious.  |  |
| <b>Slight positive visual effects</b>     | The development would result in a slight alteration to the identified view or visual amenity of an area with minor changes to key visual features in the view. These beneficial effects may be raised as local factors. They are unlikely to be critical in the decision-making process but are important in enhancing the subsequent design of the project.<br><br>The proposals will result in a some small change in the key characteristics of the view or visual amenity or will introduce elements largely characteristic to the qualities of the existing view or visual amenity such as massing, scale, pattern and some small appropriate features; and/or the proposals will marginally conserve or enhance the integrity of visual character; and/or the proposals and                                   |  |

|   |  |   |
|---|--|---|
|   | <p>resulting effects are in some part in compliance with landscape planning objectives and/or result in a small loss, or negative alteration of key visual elements, features or notable characteristics.</p>  |   |
| <p><b>Moderate positive visual effects</b></p>                  | <p>The development would result in a moderate alteration to the identified view or visual amenity of an area and may affect key visual features in the view or introduce new features within the scene or alter some small part of the composition or character of the view. These beneficial effects may be important but are not likely to be key decision-making factors. The cumulative effects of such issues may become a decision-making issue if leading to an increase in the overall adverse effect on a particular resource or receptor.</p> <p>The proposals will result in a notable beneficial change in the key characteristics of the view or visual amenity or will introduce elements that are largely in keeping with the qualities of the existing view or visual amenity with no inappropriate features; and/or the proposals will notably conserve or enhance the integrity of visual character; and/or the proposals and the resulting effects are largely in compliance with landscape planning objectives and/or result in the retention of key visual elements, features or notable characteristics.</p> | <p>VP2a<br/>VP2b<br/>VP2c<br/>VP5b<br/>VP6<br/>VP7b<br/>VP7c<br/>VP9<br/>VP10</p> |
| <p><b>Large (rarely very large) positive visual effects</b></p> | <p>The development would result in a substantial alteration to the identified view or visual amenity of an area with large affects upon key visual features in the view or the introduction of new notable features within the scene or alterations to some part of the composition or character of the view. These beneficial effects are considered to be very important considerations and are likely to be material in the decision-making process.</p> <p>The proposals will result in a wholesale beneficial change in the key characteristics of a view or visual amenity or will introduce elements that notably improve the qualities of the existing view or visual amenity with no inappropriate features; and/or the proposals will notably conserve or enhance the integrity of visual character; and/or the proposals and the resulting effects are totally in compliance with landscape planning objectives and/or result in the retention and improvement of key visual elements, features or notable characteristics.</p>   |   |

6.6.14 The table below is an abbreviated summary of the outcomes reported in the LVIA.

| <b>Viewpoint</b><br>(Baseline panorama or photograph) | <b>Location</b>   | <b>Distance to development (nearest point) from receptor viewpoint (m)</b> | <b>Visual assessment</b><br><br><b>Operational phase day and night</b>  | <b>Significance of Residual Effects</b>                      |
|---|---|--|---|--|
| 1   | Eastern road verge of Ferry Road, adjacent to site entrance to Knoll House Hotel<br><br>SZ 03173<br>83268 | 15m  | <b>Receptor sensitivity:</b> Low<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b> Slight (slightly adverse)                             | <b>Significance category:</b> Slight (Not adverse)           |
| 2a  | Bridleway SE22/38, south of Knoll House Hotel<br><br>SZ 03155<br>83100                                    | 105m   | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate to Large<br><br><b>Significance category:</b> Moderate to Large (slightly adverse Year 1) | <b>Significance category:</b> Moderate to Large (Beneficial) |
| 2b  | Entrance to Wadmore Lane<br><br>SZ 03251<br>82897   | 335m   | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate to Large<br><br><b>Significance category:</b> Moderate to Large (slightly adverse Year 1) | <b>Significance category:</b> Moderate to Large (Beneficial) |

|    |   |      |   |  |
|----|---|------|---|--|
| 2c | Bridleway SE22/38, south-west of Knoll House Hotel<br><br>SZ 03084 83104                            | 83m  | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate to Large<br><br><b>Significance category:</b> Moderate to Large (slightly adverse Year 1) | <b>Significance category:</b> Moderate to Large (Beneficial)   |
| 3  | Bridleway SE22/23, west of Knoll House Hotel<br><br>SZ 02618 83186                                  | 538m | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Negligible<br><br><b>Significance category:</b> Slight (Not adverse)                               | <b>Significance category:</b> Slight (Not adverse)   |
| 4  | View from Addlestone Rock: Bridleway SE22/24, south-west of Knoll House Hotel<br><br>SZ 02618 83186 | 755m | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Minor to Negligible<br><br><b>Significance category:</b> Slight (Not adverse)                      | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Minor to Negligible<br><br><b>Significance category:</b> Slight (Not adverse) |
| 5b | Black Down Mound. Footpath SE22/17 south-west of Knoll House Hotel<br><br>SZ 02527 82482            | 800m | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b> Moderate to Large (Beneficial)                       | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b> Moderate to Large (Beneficial)  |

|    |  |       |  |  |
|----|--|-------|--|--|
| 6  | View from<br>Bridleway<br>SE22/24, high<br>point above<br>Addlestone<br>Rock south-<br>west of Knoll<br>House Hotel<br><br>SZ 02182<br>82619 | 887m  | <b>Receptor<br/>sensitivity:</b> High<br><br><b>Magnitude:</b><br>Moderate<br><br><b>Significance<br/>category:</b><br>Moderate to Large<br>(Beneficial) | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b><br>Moderate to Large<br>(Beneficial)  |
| 7b | View from<br>Bridleway<br>SE22/12<br>Studland Hill<br><br>SZ 04386<br>81347  | 2268m | <b>Receptor<br/>sensitivity:</b> High<br><br><b>Magnitude:</b><br>Moderate<br><br><b>Significance<br/>category:</b><br>Moderate to Large<br>(Beneficial) | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b><br>Moderate to Large<br>(Beneficial)  |
| 7c | Ballard Down<br>Bridleway<br>SE3/6<br><br>SZ 03347<br>81303  | 2008m | <b>Receptor<br/>sensitivity:</b> High<br><br><b>Magnitude:</b><br>Moderate<br><br><b>Significance<br/>category:</b><br>Moderate to Large<br>(Beneficial) | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b><br>Moderate to Large<br>(Beneficial)  |
| 8  | South West<br>Coast Path,<br>Old Harry<br>Rocks,<br>Handfast Point<br>– Bridleway<br>SE22/9<br><br>SZ 05433<br>82469                         | 2400m | <b>Receptor<br/>sensitivity:</b> High<br><br><b>Magnitude:</b> Minor<br>to Negligible<br><br><b>Significance<br/>category:</b> Slight<br>(Not adverse)   | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Minor to<br>Negligible<br><br><b>Significance category:</b><br>Slight (Not adverse) |

|          |   |       |   |   |
|----------|---|-------|---|---|
| 9 and 10 | Near the obelisk western end of Ballard Down SE22/14<br><br>SZ 02525 81253  | 2024m | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b> Moderate to Large (Beneficial) | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> Moderate<br><br><b>Significance category:</b> Moderate to Large (Beneficial) |
| 11b      | Sand dunes west of litter bins on Knoll Beach, adjacent to Footpath SE22/1, part of the SW Coast Path<br><br>SZ 03504 84336 | 1000m | <b>Receptor sensitivity:</b> High<br><br><b>Magnitude:</b> No visual effects<br><br><b>Significance category:</b> No visual effects     | <b>Significance category:</b> No visual effects   |

6.6.15 Since the LVIA was submitted a further interrogation of the view from the beach east of Studland Heath (VP11b), captured in an LVIA Addendum (CD2.016) which includes a section of the South-West Coast Path, was jointly considered by the application team and the LPA and which concluded that Knoll House cannot be seen from this location. The assessment has been revised to a significance of None – no visual effects.



## 6.7 Dorset Council's Statement of Case Paragraph 6.11

Paragraph 6.11 states *“The proposal has a significant negative impact on the important features of landscape character identified in the relevant Landscape Character Assessment for this part of the National Landscape and conflicts with the reasons for the designation of the AONB for its landscape and scenic beauty. This includes the undeveloped coast, panoramic views, tranquility and heathlands amongst other characteristics, all of which contribute to the scenic beauty”*.

- 6.7.1 The appellant disagrees with this statement.
- 6.7.2 The Appellant and the AONB opened a dialogue about matters of landscape character during the determination period. The key discussion points are outlined below.
- 6.7.3 The AONB Team made repeated comments about the size of the buildings when viewed from Ferry Road and the footpath network and residential houses south of the site within 540m from the site boundary. The consultee response finds the resulting visual effect harmful to the AONB designation. We take this to mean that the AONB Team would prefer the buildings to be screened, or perhaps ideally hidden, by new planting as a form of camouflage mitigation. The imperative to minimise harm to the landscape is at the heart of the proposal, learning lessons from the previous application, and using a landscape-led approach to a new design for the site. The resulting buildings, when compared to both the baseline condition and the previous application, are a robust set of primary mitigation measures designed to minimise any adverse effects upon the landscape and visual receptors.
- 6.7.4 From viewpoints beyond 775m, all on high ground, the hotel sits with a backdrop of woodland. The existing building is apparent (albeit at distance) where it reads as a cluster of white forms with red roofs and a dominant southern elevation. In contrast the proposal favours visually recessive materials and colours, green roofs and an open landscaped courtyard so that the buildings are much less visible than the baseline condition. This has led to the LVIA assessing the residual visual effects as beneficial when compared to the baseline condition.
- 6.7.5 It is not the design intention to screen the proposed building from Ferry Road. Rather to develop the tree cover which filters views towards the buildings and to add to the existing shrub associations at ground level in a similar way to the existing condition, maintaining views from the hotel towards the east. The planting is located alongside Ferry Road and close to the buildings with a swathe of mown grass under the existing and proposed pine trees. This will provide low-level visual

privacy (at walking, cycling and car eye level) between the road users and the ground floor rooms while extending the grass/pine condition that exists currently.

#### AONB MANAGEMENT PLAN 2019-24 (CD5.001)

6.7.6 The AONB/National Landscape published policies contained within the AONB Management Plan 2019-24 (CD5.001). Section 9.3 covers Planning for Landscape Quality. The role of the published policies upon the development of the proposals, and the effect that the proposals would have upon these policies are responded to in turn below.

#### *C1 THE AONB AND ITS SETTING IS CONSERVED AND ENHANCED BY GOOD PLANNING AND DEVELOPMENT*

*a. Support development that conserves and enhances the AONB, ensuring sensitive siting and design respects local character. Development that does not conserve and enhance the AONB will only be supported if it is necessary and in the public interest. Major development decisions need to include detailed consideration of relevant exceptional circumstances*

6.7.7 The development replaces an existing collection of poor-quality buildings within the same boundary with no change to the physical surrounding landscape. The existing hotel complex is visible from the south where it appears as a minor but obvious incongruous element within the wider landscape.

*c. High quality design, materials and standards of workmanship are required of developments within the AONB. Good design and material use does not have to be a cost burden, however where this requirement affects development viability, consideration will be given to the balance between the public benefits of a proposal and the significance of its landscape and visual effects. When the landscape and visual effects of a development cannot be fully addressed through primary design measures, appropriate and robust secondary mitigation measures that can be delivered, enforced and maintained will be required.*

6.7.8 The LVIA describes an approach to protecting the character and appearance of the Dorset AONB in sections 6.279 – 6.316 Attention is drawing to the following extracts from the LVIA:

- 6.280 The application site (within the red line) currently contributes little to the AONB. However, the adjacent woodland (within the blue line), is leased from the National Trust on a long-term basis. A long-term management plan protects its condition and ensures that views from the north and west will remain unchanged for the lease period. To the east, the lease land is largely open grassland used for recreational purposes.
- 6.281 The development acknowledges that the trees at the site boundaries, and to a lesser extent within the site, are critical to the site's contribution to the local landscape. These trees are assessed as being more important than the buildings.
- 6.282 The trees which surround the site to the north and west also play a critical role in the way that the site is perceived from the surrounding area. From both north and west locations, the site is not read as part of the wider landscape. To maintain this real and perceived effect, the protection and continuity of the woodland will need to be ensured for the life expectancy of the development. This woodland is also subject to a woodland management plan which ensures that the woodland is not only protected but managed to ensure its health into the future.
- 6.283 The site sits within the wide-open landscape of Studland and Godlingston Heath National Nature Reserve, Godlingston Heath, Studland Heath, Studland Bay, the South-West Coast path, and the ridge along which the Purbeck Way runs east-west. Much of this landscape is open access land with a network of footpaths, bridleways and byways.
- 6.284 This landscape and its designations do not currently exhibit much influence upon the character of site which is largely independent of its host landscape. The exception are the trees discussed above.
- 6.285 Similarly, while the site does exhibit visual influence on its host landscape, it makes little contribution to its landscape character. Its main effect is through the built character of a short section of Ferry Road and its position on the ridgeline above Studland Bay.
- 6.286 The independence of the site from its surroundings is a missed opportunity.

#### 6.7.9 The LVIA recommends the following mitigation measures:

- 6.287 The inherent and primary mitigation achieved through a detailed iterative design process has resulted in a proposal which is assessed as beneficial to the landscape character when compared to the baseline condition. No adverse effects upon landscape character were assessed and therefore no specific further mitigation measures to reduce are recommended.
- 6.288 No adverse effects upon the World Heritage Site designation were found. The development replaces one form of architecture with another within the site boundary with no change from the baseline condition. The potential interconnection between the site and the WHS (restricted to a short section of coastline close to Old Harry Rocks) is visual with no adverse effect upon the designated characteristics.
- 6.289 Similarly, the hotel site is set back from the coastline in a slightly elevation position relative to the shoreline. The potential interconnection between the site and the sea and shoreline is visual and receptors will be able to view the development from recreational boats and cross-channel ferries. It is assessed that changes to the site will not adversely affect the seascape characteristics.

- 6.290 A decreased number of keys for the proposed development (including no longer having staff accommodation on site) compared with the existing situation means that overall visitor numbers are likely to be reduced.
- 6.291 The inherent design measures which have adopted a landscape strategy to make the site more open, and with a focus on open landscape within the site, will encourage more passive outdoor recreational activities, such that the site should not change perceptions of tranquillity and remoteness compared to the baseline condition.

*f. The AONB's coast will be conserved and enhanced, and significant weight will be given to maintaining its undeveloped and tranquil nature. The importance of the AONB's coastal areas as the setting for the World Heritage Site (WHS) will be recognised and the presentation and visitor experience of this asset will be protected from both individual developments and cumulative effects of incremental change.*

6.7.10 As a development which replaces an existing hotel it is assessed that there will be no change to the tranquillity of the site and area compared with the baseline condition.

**C2 LANDSCAPE ASSESSMENT & MONITORING IS EFFECTIVE AND**

*f. Proposals that are harmful to the character and appearance of the area will not be permitted unless there are benefits that clearly outweigh the significant protection afforded to the conservation and enhancement of the AONB. Where impacts cannot be mitigated, planning gain and compensatory measures will be considered.*

**C4 DEVELOPMENT WHICH HAS NEGATIVE EFFECTS ON THE NATURAL BEAUTY OF THE AONB, ITS SPECIAL QUALITIES, ECOSYSTEM FLOWS AND NATURAL PROCESSES IS AVOIDED**

*a. Remove existing and avoid creating new features which are detrimental to landscape character, tranquillity, and the AONB's special qualities.*

6.7.11 The LVIA has assessed the existing hotel as being in very poor condition and making a detrimental contribution to the site and locality.

*c. Protect and where possible enhance the quality of views into, within and out of the AONB.*

6.7.12 There are no views of the existing or proposed development from the west and north. Views towards the proposed development from higher ground to the south will be improved through the replacement of a collection of highly visible, poor quality and randomly located buildings with a coherent visually recessive suite of new architectural interventions.

6.7.13 Views of the southern boundary will change with a taller building on the western part of the site compared to the baseline view. The introduction of a more recessive green roof building on the southern boundary will be a significant change from the baseline view and less dominant than the baseline view. On balance this is assessed as not adverse.

6.7.14 Visual receptors viewing the site as the travelling public along Knoll Road will notice a change to the architecture, but not a wholesale change to the view. This is assessed as not adverse.

*d. Protect the pattern of landscape features, including settlements, that underpin local identity.*

6.7.15 The proposed changes are to the hotel buildings themselves, most of which are poor quality or incremental mid-late 20th century additions. The iconic historic eastern core façade is retained. This is assessed as not adverse.

*f. Avoid and reduce cumulative effects that erode landscape character and quality.*

6.7.16 The cumulative effect of incremental building at Knoll House Hotel over the years has led to an incoherent collection of random buildings surrounding its historic core. The development proposals provide an opportunity to rationalize the site into a new coherent set of complimentary buildings for future generations.

## 6.8 Dorset Council's Statement of Case Paragraph 6.13

Paragraph 6.13 states "*The Landscape Strategy Plan submitted in support of the proposal is, for a development of this size and impact, insufficient to demonstrate that the proposal would sit comfortably within the setting*".

6.8.1 This matter was discussed in detail with the AONB Unit and the Council's Landscape Officer. The communication thread was as follows:

6.8.2 Feedback was received from the AONB Unit (*in italics*). The appellant returned a set of responses outlined below:

*"The landscape strategy shows green roofs in areas where the roof plan for the overall site suggests a green roof will not be used. This remains a point of clarification"*.

6.8.3 The extent of green roofs has been clarified by AWW in the design response. The Landscape Strategy Plan is correct.

*"The strategy does not appear to include details of the proposed green walls included in the design"*.

6.8.4 The green walls will be achieved using climbing plants, planted at ground level and trained using training wires.

*"The strategy confirms an observation that the AONB Team previously offered concerning the majority of new planting being proposed between the villas and hotel complex and along the frontage to Ferry Road. It should be noted that the courtyard parking is enclosed by relatively tall structure and whilst this may offer amenity to the users of the site, the planting would not serve to substantively reduce the massing of the buildings when seen from the surrounding landscape. Overall, reductions to the scale/massing of the buildings are recommended, alongside redistribution of planting so as to better enclose and intersperse the structures"*.

*"There is a paucity of planting in in the southern extent of the site, where the two-storey villas, car park and spa are located. The refused application for this site identified the southern boundary as a priority for new planting, whereas the latest plans appear to give limited priority to this area"*.

6.8.5 The criticism of the refused scheme related to the scale of the buildings on the southern boundary of the site and the use of secondary mitigation, in favour of primary mitigation, to assimilate this boundary. This revised proposal uses primary mitigation in the form of the building design which, aside from the fundamental change in architecture to reduce scale and mass, relocates built development further from the southern boundary (refused scheme Block B1 was

located adjacent to the southern boundary and Block B2 within 9m, the appeal scheme now proposes a reduced scale accommodation 25m from the southern boundary with planting incorporated). The Spa has also been designed as primary mitigation, as a single storey building with a green roof and drop eaves to meet the ground. The submitted photomontages show the positive effect this will have in views from the south. Matters in respect of design specifically, whilst it is not explicit in the reasons for refusal, other than scale and mass, are dealt with by Mr Alkerstone in his evidence.

- 6.8.6 The primary mitigation approach reduces the need for boundary screen planting. The parking area is substantially screened, including a landscaped bank to the base of the stone wall, by shrubs and taller pine trees except for a length of boundary between the planting area shown on the drawing and the Spa. This short length, where the stair core to access the below ground parking abuts the site boundary, will be addressed through boundary walling with car parking set back from the boundary.

*“Concerning the frontage to Ferry Road, the plan appears to show that the approach will be to largely retain existing trees to the north of the access, with ribbons of ornamental shrub and herbaceous planting bordering the highway and the buildings. For the most part, this approach is similar to the existing position to the fore of the existing hotel building. The plans also show an area of new advanced stock conifer planting to the fore of the apartments. Furthermore, curtilage planting of ornamental shrub and herbaceous species are shown close to the spa building and between the access road and restaurant. Again, this is not a significant departure in terms of the quantum of landscaping, as compared with the existing position. However, as noted in my earlier response, the impact of the frontage to Ferry Road appears to be quite substantially increased and would appear unlikely fully mitigated by the proposed planting. Consequently, I remain of the opinion that further primary mitigation is required”.*

- 6.8.7 A response to these issues is set out in the DAS Addendum (CD2.014), in justifying the approach to the building frontage along Ferry Road. The proposal adopts a contemporary approach to architectural design, which has been supported by the LPA’s Conservation and Design Officer (refer Conservation and Design Officer’s response dated 19.12.22 (CD3.010)). The proposal has considered the existing building line and scale along the Ferry Road frontage (see DAS Addendum CD2.014 pp.4 – 7). Whilst the proposal adopts a more consistent approach to architectural form rather than the current organic evolution of architecture which are considered by officers to be of no architectural merit, it is recognised as a change in the existing character. However, it is unclear why such a change in character, given the existing poor quality of building stock is harmful

in landscape terms and, whilst the landscape proposals do introduce some further substantial planting to filter views, including the use of large nursery stock pines, why further mitigation is required.

#### 6.9 Dorset Council's Statement of Case Paragraph 6.14

Paragraph 6.14 states *“The Council also considers that reliance on existing trees together with proposed new planting, is unlikely to sufficiently offset the visual impact of the proposal, given the scale and massing of the proposed buildings and other proposals such as the car park”*.

- 6.9.1 The Arboricultural Impact Assessment (CD1.054) identifies 29 trees for removal: 16 Category B and 13 Category C. Plus further groups (Category C) located in the western sector of the site.
- 6.9.2 Apart from one (T34), all the eastern boundary trees and iconic conifers are retained.
- 6.9.3 The proposed Landscape Strategy Plan (CD2.001) shows as proposed: 20 large, advanced nursery stock conifers, 28 mid-sized conifers and 86 broadleaved trees totalling 134 trees across the site. This is an increase in tree numbers of around 80. The actual difference is 105, but this does not account for trees to be removed forming part of tree groups.
- 6.9.4 The trees to be retained are one of the most important parts of the project and the Scots pines along the eastern boundary are iconic local landmarks. The buildings have been strategically planned and located to minimise tree felling. New advanced nursery stock Scots pine trees are proposed along the northern end of the eastern boundary to supplement the existing ones and to create instant height and massing to the canopy in front of the new buildings. These will be relatively protected from prevailing winds and should establish as semi-mature trees. Elsewhere it is a balance of nursery stock sizes using larger nursery stock trees to achieve instant impact, height and screening/filtering of views, and younger trees which will establish as more natural forms in the long term.
- 6.9.5 Particular attention has been paid to the south boundary which is the most open to views and where larger Scots pine conifers have been included for speed of effect.
- 6.9.6 The whole site should develop a significant canopy cover within 10 years.



#### 6.10 Dorset Council's Statement of Case Paragraph 6.15

Paragraph 6.14 states *“The existing 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. The Council's concerns in relation to Trees are twofold. In the first instance, it has not been demonstrated that, given the size and scale of the proposed development, it would be possible to implement the proposals without damage to retained trees particularly where areas of excavation or fill are proposed. For instance, the T40 oak, one of the best trees on site, is a category B tree. Located close to south boundary and Ferry Road frontage, the proposed layout infringes the Root Protection Area, and the crown would require pruning to provide vertical clearance over proposed structure. This Tree is not yet mature and has the potential to increase in size and amenity value. The Council considers that the proposed building would be unacceptably close to the tree and will provide evidence to that effect”*.

6.10.1 Details of tree protection during the construction phase are outlined in the Arboricultural Impact Assessment (CD1.054).

6.10.2 Special engineering and construction measures have been taken to ensure the protection of the rooting zone for Tree T40.

#### 6.11 Dorset Council's Statement of Case Paragraph 6.16

Paragraph 6.16 states *“The reliance on existing trees together with proposed new planting, is unlikely to be sufficient to mitigate the harmful visual impact of the proposal and impact on character, given the scale & massing of buildings. This lack of evidence adds weight to the concerns regarding landscape impacts, as there is doubt regarding the deliverability and long-term retention of the mitigation proposed”*.

6.11.1 The approach to tree planting is common practice for this type of development and tree species and sizes have been selected for speed of impact and successful establishment in the medium (7-10 years) and long-term (25 years +). Tree species are those found locally and those that are predicted to be resilient to climate change.

6.11.2 The trees form an important part of site mitigation, especially to filter views from the south and along Ferry Road. Their successful establishment is not only a form of mitigation but an inherently critical part of the site strategy. Good horticultural practice will be adopted at all stages of the development to ensure that these trees establish well and remain healthy for the lifespan of the development and

beyond. A Landscape and Ecological Management Plan is proposed, and can be secured, to aid the ongoing management of the proposed tree planting. This is commonplace.

6.11.3 In contrast to the landscape management of the existing hotel, the proposed landscape within the site will be subject to a greatly enhanced management regime. This will combine both management of the habitat and biodiversity enhancements as well as amenity planting closer to the hotel curtilage.

## 7.0 Summary and conclusions

7.1 The district is heavily constrained by policies which protect the landscape character and value of the area.

7.2 The Council has not offered any professional analysis of the nature of the baseline condition or the nature of the proposals and effects upon landscape designations, landscape character, national and local policies and visual receptors. The LPA's Statement of Case makes a number of unsubstantiated allegations which are not borne out by proper analysis. Nor does it reference any findings within the LVIA.

7.3 The locational benefits of the appeal site can be summarised as:

- Replacement of an existing hotel complex within the same site boundary. No changes are proposed to land outside the existing site which will remain as per the baseline condition.
- The current hotel complex is in poor condition, has developed through incremental and unplanned random additions to the hotel buildings and its associated infrastructure in the second half of the 20<sup>th</sup> century, and is now a complex of buildings which are inherently harmful to the landscape character, visual receptors, and the AONB designation.
- The existing hotel complex (baseline condition) precedes the AONB designation and would likely be inviable when tested against current AONB, NPPF and local planning policies. This creates an opportunity, for the first time since the AONB designation, to reverse the harmful impacts caused by the baseline condition. This is achieved through a new planned high quality architectural proposals (presented by the design witness Mr Mark Alkerstone), and development that responds to current policies (presented by Mr Ben Read of Black Box Planning). The proposal avoids harms to the landscape character, landscape designations and visual receptors.
- The site is well screened from the surrounding areas and views towards the site are hard to find. Key representative views from the surrounding area are identified and agreed with the LPA and are assessed as having a beneficial or not adverse impact upon landscape designations, character area descriptions and visual receptors.

- 7.4 Having responded systematically to the Council's Statement of Case I conclude that there are no landscape and visual issues that substantiate an objection to the proposed replacement of a hotel in this location.
- 7.5 It is clear that the landscape has the capacity to accommodate this replacement hotel in a manner consistent with the landscape character and visual envelope.