

4<sup>th</sup> December 2023

Ursula Fay  
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(Via email)



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Dear Ursula,

**Re: Knoll House Hotel, Ferry Road, Studland – Proposed redevelopment of existing hotel to provide new tourist accommodation including: 30 hotel bedrooms, apartment and villa accommodation and associated leisure and dining facilities.**

Following receipt of a number of consultation responses to the amendments submitted in August, we have now had the opportunity to review the comments. I have provided responses and points of clarification below and attached, in respect of:

- AONB Unit;
- Landscape Officer; and
- The National Trust.

It is also pleasing to see the positive response from the Economic Development Team, who recognise the benefits that the proposal will bring to the area. Similarly, I also had the benefit of attending the Parish Council meeting on 16<sup>th</sup> October 2023 where Cllrs expressed their support for the scheme.

This letter should be read alongside the following information, enclosed:

- Appendix 1 – Design Response, prepared by AWW Architects;
- Appendix 2 – Landscape Response, prepared by Richard Sneesby Landscape Architects;
- Updated Viewpoint images (high resolution and low resolution versions submitted); and
- Individual Viewpoint Images submitted by WeTransfer.

### **AONB Unit, 24<sup>th</sup> October 2023**

The response, as with the comments raised in January 2023, is predominately focused on design-based matters. A response to the individual matters raised is enclosed at Appendix 1, prepared by AWW. The AONB comments in respect of design generally should be seen in the context of the approach to redevelopment of the site on a holistic basis. This is recognised by the LPA's Design and Conservation Officer comments, which state that:

*'The site, which is certainly a key one in the area, is generally in need of investment and reinvigoration, with a collection of tired buildings which have little or no architectural or historical value beyond the small central core, whose associative significance remains largely as an intangible characteristic rather than an association with the specific spaces. **The bold, modern approach is considered the right one overall in order to avoid a similar collection of non-descript, disconnected structures or one where pastiche of some selected element is the underlying philosophy.** In any case, the Arts-and-Crafts idiom plays overall very small part in the overall style of the site.'*

The approach to design has also been integrated with a landscape led approach, which includes primary mitigation in the design and use of materials proposed for the buildings.

The extent to which the AONB Unit comment on matters relating to landscape visual and character impacts, affecting the AONB, is limited save for some comments on the scale of photomontages. A response to these comments specifically prepared by Richard Sneesby Landscape Architects is attached at Appendix 2. However, from a planning perspective, the comments on the scaling of photomontages which were submitted electronically (and capable of being viewed without printing) do seem to be overstated, having read the LVIA and the conclusions reached. The proposal is not widely visible within the surrounding landscape and, as has been the assertion of the applicant from the outset of proposals for the redevelopment, should be seen in the context of the existing buildings on site which have a negative impact on the area, albeit they have become a familiar sight. It is considered that the AONB comments may be focused on the impact of the proposal on the 'intangible characteristic' of the existing hotel, recognised by the Design Officer.

The landscape response at Appendix 2 sets out cogent reasoning why the landscape effects have been considered robustly. The approach adopted, contrary to the allegation that they have been underreported, takes a precautionary approach which highlights visibility, where it may not otherwise be seen. This is more akin to over-reporting effects.

It is also noted that the comments have been made by the AONB Unit were initially done so without the benefit of the Landscape Strategy Plan which was submitted in February 2023, and again subsequently. A further email was received, dated 24<sup>th</sup> November, with a supplementary comments from them, and a response to those is also incorporated within Appendix 2.

### **Landscape Officer Comments, 26<sup>th</sup> October 2023**

The comments raised are broadly aligned to those made by the AONB Unit. Accordingly, the comments set out in Appendix 1 & 2 are also of relevance. It is recognised that the amendments are welcomed. Helpfully, the comments include elements which could make the proposal acceptable to the landscape officer, in landscape terms, including:

- A softer approach to the design of the hotel, and further reduction in the amount of glazing, especially along the Ferry Road frontage;

- Breaking down the massing and scape of the 3 storey villas to achieve a more diffuse arrangement;
- A reduction in the amount of rooflights/glazed roofing;
- The use of green wall construction and additional timber cladding and green roofs; and
- Consideration of alternatives to roof mounted solar panels.

All of these matters are considered in Appendix 1. It is noted that the issue of alternatives to roof mounted solar panels, whilst not accepting the impact of those proposed in visual terms (as demonstrated in the LVIA), the applicant would be agreeable to this amendment.

**Planning Officer email, dated 24<sup>th</sup> November 2023**

I appreciate that we have spoken since receiving your email, dated 24<sup>th</sup> November, and you will be providing a further response to me. However, I have provided comments, below, which I hope are helpful.

The enclosed landscape response identifies that the LVIA does not under report the impacts of the proposal and it does meet best practice, having been prepared in accordance with GLVIA 3. The issue raised by the AONB Unit in respect of the scale of the viewpoints has also been supplemented by revised photosheets which can be printed at A3.

The sensitivity of the AONB is recognised and been central in the design of the scheme, but the site is not widely visible from surrounding viewpoints, apart from those identified in the LVIA, many of which are viewed at considerable distance. They are also viewed in the context of the existing baseline, which includes the hotel in its current form. This does not appear to be recognised in the responses received to date. The LVIA has informed the approach to design, including scale, mass and use of materials in a landscape led approach. It is evident from the photos that the proposal will not be widely visible, especially in the context of the existing building, which is shown in the number of conclusions where there will be beneficial effects. However, despite this, comments persist in respect of the impact arising from the scale and bulk of the proposal, much of which is not visible from beyond the site. If there are specific comments on the views included within the assessment, I would be grateful if comments are provided with greater prescription to help focus matters, or possibly, an alternative assessment.

I would also be grateful for further commentary on why the proposal is unacceptable in character terms, when viewed from Ferry Road. As set out above, this should be seen in the context of the comments raised by the Design and Conservation Officer, who is of the view that the existing buildings are of no real architectural merit, and as an 'intangible characteristic'. Having listened to a range of views over the years, it is considered that the character of the existing hotel is driven by nostalgia and the, once thriving, location as a holiday destination. I also do not consider the existing form and appearance to reflect high quality design or the positive elements of local character, save for the original central element of frontage building. There are a number of examples of contemporary architecture locally,

which utilise high quality local materials, which have helped direct the architectural approach to the scheme, which is considered to be high quality. The DAS Addendum also provides analysis of the relative scale of the proposal compared to the existing buildings, which are comparable, albeit the existing buildings are ad hoc and encroach further towards Ferry Road.

### *Need for Renovation*

Your email states that the need for renovation could be met through a more moderated design. It is unclear whether this means that you consider that the existing hotel could be adapted or that a smaller scale redevelopment would be possible.

The approach to redevelopment, in principle, has been discussed at length since proposals were first submitted 6 years ago. I had thought that it was generally accepted that Knoll House was in need of redevelopment, from both a physical and operational perspective.

The existing hotel includes provision for a large number of keys (lettable rooms) with relatively few facilities. It is an intensive form of accommodation which was reflective of a tourism model which is now out of date in considering high quality provision. Today, the market demands more space per guest and a greater range of facilities (which is also helpful in weatherproofing visits). To include provision for such facilities, a critical mass of accommodation is required. The proposal has been prepared on the basis of the balance between the level of accommodation and facilities. Having reduced the level of accommodation significantly since the submission of the first planning application, it would not be viable to reduce it further. In such circumstances, the other, hypothetical, approach would be to intensify the existing hotel operation in a similar format to secure enough capital investment to upgrade the existing buildings (albeit operationally, this would not be desirable in market terms), but this would not improve the quality of provision and would serve the budget end of the market. However, critically, the intensification of use would not be acceptable in planning terms, because of the neighbouring heathland and associated Habitat Regulation issues.

In light of the above, and the extensive analysis, it is Kingfishers objective to improve the quality of tourism accommodation and deliver a luxury boutique resort. A series of case studies and more detailed overview of the operational considerations are set out in the submitted Operations Report. These include examples developed by Kingfisher and their partners, such as: Gara Rocks, the Polurrian and Una St Ives, and others such as: Soho Farmhouse and Carbis Bay Hotel.

Kingfisher are resort developers and operators with extensive knowledge of the tourism market. The approach adopted includes a symbiotic approach between guest numbers, accommodation quality and the range of facilities required to achieve a luxury standard. It is not an arbitrary formula but one which considers development viability and operational requirements. Accordingly, it is not considered that the scale of the proposal could be moderated further. However, I would welcome further comments from you to substantiate your views, if you consider more prescriptive amendments could be made broadly

maintaining the existing relationship of accommodation levels and facilities. Equally, I would be happy to meet with you to discuss these issues in more detail.

*Use Class*

The Operations Report, submitted with the planning application, provides a number of examples of existing resorts where the accommodation is provided as a mix of C3 and C1. It is commonplace within the industry and aids in the delivery of high-quality tourism developments. In practice, however, there is no difference in the way that the resort will operate whether it is C3 or C1 (or a mix). Guests will have the same experience, with all facilities centrally serviced and managed. The applicant has offered, and is agreeable, to the use of controls (either by legal agreement or condition) to control the use of the C3 accommodation, to ensure that it remains as holiday accommodation rather than principal living accommodation. This is also a commonplace means to control such uses, including within Dorset. This control is reflected in emerging Policy E8 of the Purbeck Local Plan (Main Modifications, November 2023) Main Modification 20 which sets out that:

*'To ensure that sites are not harmed, residential development involving the net increase in dwellings or other uses such tourist accommodation and equestrian-related development:*

- a. Will not be permitted within 400metres of the heathland, as shown on the proposals map, unless, as an exception, the type and occupier of residential development is restricted in perpetuity to those who would not have an adverse effect on the sites' integrity (e.g nursing homes such as those limited to advanced dementia and physical nursing needs).....'*

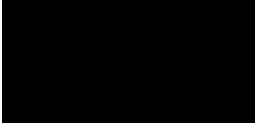
The approach adopted in this case, as a matter of principle, would not be in conflict with emerging policy subject to the control over use and concluding that the proposal would not have an adverse impact on the heathland. Given the stage of progress with the Purbeck Local Plan review, which has now reached a consolidated Main Modifications stage, it is a policy which can be given reasonable weight in the determination of planning applications. As with the HRA, it is a consideration of the impact which is critical, not the land use per se.

In light of the above, I would welcome further engagement with officers regarding the approach to appropriate assessment, because it is critically important to avoid any conflation between the judgements of policy and the assessment of evidence required to reach conclusions in respect of potential impacts on the Heathland. Even if officers were to conclude a conflict with policy, this should not necessarily adduce an adverse impact on the heathland. The shadow HRA submitted with the planning application sets out the approach in detail and is a matter which has been considered with the prescription required, given the recognised sensitivity of the local area. It is, however, worth noting that the most recent amendments to the proposal have further reduced the capacity of the proposal, to the extent that it now reduces the level of overnight accommodation to a level equivalent to 59 fewer people than the existing capacity. This is a significant reduction in impact terms.

I hope that the above is of assistance in progressing your consideration of matters. The applicant would welcome further discussion in order to progress the assessment as expeditiously as possible, and consider there is merit in such discussion. In the meantime, I

look forward to receiving your further response to my email, dated 24<sup>th</sup> November and any further matters raised in this letter.

Yours sincerely



**Ben Read MRTPI**  
Director

Appendix 1:  
AWW Design Response to AONB Unit

Appendix 2:  
Richard Sneesby Architects Landscape Response