



Dorset AONB Partnership  
**Hosted by Dorset Council**  
1<sup>st</sup> Floor East, Environment Directorate  
County Hall  
Dorchester  
Dorset DT1 1XJ

Dorset Council  
Development Management  
County Hall  
Dorchester  
Dorset DT1 1XJ

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**Application number:** P/FUL/2022/06840

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

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

Dear Mr. Williams,

Thank you for consulting Dorset AONB Team. This application proposes the redevelopment of the Knoll House Hotel site, at Studland. The redevelopment proposals comprise a hotel, apartments, villas, a bar/restaurant and a spa building, as well as areas of parking and landscaping. This is a relatively large and complex proposal, and we would like these comments to be treated as our initial review of the design proposals (noting that pre-application advice has not been sought). Overall, it is our opinion that the proposals would not conserve and enhance that character of the designated landscape, primarily because of the scale of the redevelopment and overtly modern characteristics of the design.

This proposal follows the refusal of an application submitted in 2018 (reference 6/2018/0566). The decision notice, issued in February 2022, contains two reasons for refusal. The first reason relates to the application having failed to overcome the 'major development test' relating to AONBs, with the reason noting that: "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." The second reason for refusal relates to impacts on protected heathlands, which are also within the AONB. There were specific concerns about the impact of C3 uses close to the heaths and the reason notes: "Mitigation measures have been identified but do not address all matters and have not currently been secured in perpetuity."

Following the refusal of this earlier application it is our understanding that the applicant has engaged a new design team and landscape consultant. Consultation with the local community and some wider stakeholders has taken place prior to the application being submitted, although this activity has not extended to the AONB Team. Furthermore, it is also our understanding that the applicant has decided to submit the revised plans without engaging with the pre-application advice service offered by Dorset Council.

In this letter I will provide an opinion as to whether the revised proposals, by virtue of their scale, form, massing and overall design, are appropriate within the sensitive AONB and Heritage Coast location. The

issue of heathland impacts and mitigation will be responded to by the Council's Natural Environment Team and Natural England. However, the conservation and enhancement of the heaths clearly relates to the special qualities of the AONB and can be considered an important consideration in the context of NPPF para 176.

Overall, it is considered that the redevelopment proposals are likely to be a form of 'major development', in relation to NPPF paragraph 177, largely due to the apparent increase in internal floorspace and resultant built mass (the increase, as compared to the existing hotel, does not appear to be quantified within the various reports). Additionally, the striking, modern character of design further suggests that it should be classified as a major development. Whilst the AONB Team is generally supportive of the principle of redeveloping and modernising the Knoll House Hotel site, we have previously indicated that the sensitivity of the location requires a restrained and creative design response. Unfortunately, we do not consider that the revised plans can yet be considered a suitable solution for the site's redevelopment and, as such, we object to the application. However, within this response, we offer a range of observations that could inform potential revisions to the design.

Turning to the details of the proposal, the development is comprised of the following elements:

- A central reception building, which partly retains an element of the existing hotel.
- A two-storey restaurant to the south of the central reception area, connected using a two-storey glazed link.
- A three-storey hotel, containing 30 bedrooms, predominantly located to the north of the reception building, connected by a two-storey glazed link.
- A four-storey apartment complex, located to the rear (west) of the hotel, comprising 22 apartments.
- A crescent terrace of three-storey villas, located on the most elevated part of the site, to the west of the hotel/reception/restaurant/apartment development. This block of development includes 20 units.
- A terrace of six two-storey villas, located to the south of the larger crescent terrace.
- A predominantly spa building, that has a prevailing height that is comparable to a two-storey building, located in the south-eastern portion of the site.
- Areas of internal landscaping, particularly between the three-storey apartments and main hotel complex.
- Surface and basement parking areas, with the main surface level car park being in the southwestern corner of the site and a basement car park being situated beneath part of the crescent terrace of three-storey villas.
- Internal access routes, including vehicular access to a central drop-off point and to the car parks. Service routes are also including, notably a peripheral ramped route that rounds the western extent of three-storey villas to reach a service area close to the northern boundary of the site.

As can be understood from the above, there is a relatively wide range of interventions proposed. Each of the built accommodation and leisure elements described above has its own character, with a distinctive and modern architectural approach. Within this range of buildings, there are a number of interesting choices concerning materials, roofing and walls (with the proposal incorporating a number of green roofs and walls). Overall, there are aspects of the design which have the potential to be considered as positive, in relation to moderating landscape and visual effects. However, the overall scale of the redevelopment and its highly modern character, including a prevalence of high impact features such as extensive amounts of glazing and standing seam, make it impossible for us to support the design. Although secondary mitigation measures, including green walls and roofs, as well as the use of timber cladding, are broadly welcomed, the

inclusion of these does not obviate the need for effective primary mitigation (including appropriate scale/mass) and an overall design that is more in keeping with the character of the wider area, whilst also having its own identity. Furthermore, it is questionable whether the green architecture that is proposed is positioned in a manner that sufficiently counterbalances the impacts of other materials, such as extensive glazing and zinc roofs, in relation to views of the development from the surrounding landscape. Although the green roofs appear extensive on plan, these are largely flat areas that will often not be seen from the surrounding area, particularly the immediate environs. Overall, less overt modernism in the design, alongside a reduction in scale/mass should be considered, as well as the increased use of 'natural' materials and outwardly visible green architecture, better counterbalancing the extensive amounts of glazing/zinc (N.B some specific recommendations are made later in these comments).

Concerning the site's landscaping, it is also important that this is arranged in a manner that enhances the appearance of the site from external viewpoints. The LVIA's recommendations for planting locations and concepts are commonly expressed in writing, with occasional statements that the planting (within and off site) is shown on the drawings. The specific drawings are not referenced and, overall, the plans presently do not appear to demonstrate all of the concepts that are referred to within the LVIA. Overall, the specific details of the onsite and offsite planting proposals are not particularly clear within the documents provided and the provision of an overall landscape strategy for the site is recommended. Furthermore, the suitability of some proposed mitigation (including conifer tree planting) may not accord with the landscape planning and management guidelines for the area and therefore requires further consideration.

From the information on planting that is presented, it appears that the development is unlikely to provide an acceptable amount and appropriate spatial distribution of this in relation to external views. As highlighted in our response to refused scheme, sufficient landscaping toward sensitive edges of the site, particularly the southern edge, is a requirement for this project. Furthermore, given the reliance of the proposal on screening from trees that are on land owned by the National Trust, suitable long-term management is an important consideration. I note that a Woodland Management Plan (WMP) has been produced (although I am unsure of the status of this in relation to support from the National Trust and/or Forestry Commission). The WMP makes proposals relevant to enhancing the structure and diversity of the woodlands, which will be of particular interest to consultees considering ecology and biodiversity. The Plan also suggests a programme of phased felling within the woodlands, the specifics of which are not clear (the applicant would presumably be required to apply for felling licences, which may provide further details in due course). Whilst the potential to secure positive management and enhanced resilience for the woodland is broadly welcomed, the prospect of felling does raise some questions as to the potential alterations to the existing screen in the longer term. This matter broadly supports the need, as stated in the AONB's response to the refused application, for the development to be of suitably restrained scale, with a sufficient amount of additional landscaping that is positioned in a manner that responds to existing and potential visibility from outside of the site area.

Turning to the design of the buildings, an observation which is of central importance, is a matter of coherence and identity. This can be considered in two ways. Firstly, the coherence of what is a strikingly modern design in relation to its wider context, considering its relatively isolated rural location, within the fringes of the village of Studland. Secondly, there is a matter of internal design consistency – i.e. degree that the various element of redevelopment sit together and achieve a harmonious whole. It is our opinion that the design could be improved on both fronts. Whilst there are some examples of bold modern design within the wider landscape, particularly some recent residential redevelopments, these have been much smaller scale interventions that have been more readily absorbed. Implementing these architectural proposals at such a substantial scale within the Knoll House Hotel site would result in a transformative outcome at something of a gateway location to the village. Although responses to design may vary,

depending on taste, we believe that it is reasonable to conclude that the approach would not be regarded as being 'in keeping', not least due to the impact of the near continuous glazed frontage that is proposed along Ferry Road (notwithstanding the nuances within the building line). Concerning the internal coherency of the design, it is our opinion that the variety of components and their spatial relationship with one another does not appear to be optimal, from a visual perspective. To take one example, the sectional elevation from the south appears to show how the various elements would sometimes not sit together in a manner that could be described as harmonious. In this instance, the contrasting architectural forms of the spa and two-storey villas is appreciable. Added to this, the potential visibility of the taller and more elevated three and four storey elements, (the villas and apartments, respectively), results in a relatively eclectic range of built forms.

The suitability of the design relative to its setting and its ability to exhibit a harmonious overall appearance are of importance to the assessment of landscape and visual impacts. It is apparent that the LVIA that has been submitted takes a very positive perspective on the design proposals, at least in relation to the baseline position. Overall, the opinion of the LVIA author is that the redevelopment would have beneficial impacts on the site, the wider landscape character units and views. The judgements provided include the rather controversial opinion that the development should be considered to have a major benefit to the special qualities of the AONB in the longer term, which is an opinion that we would refute, based on the concerns that I have outlined.

An aspect of the LVIA that requires further work is the photography and montages, which do not appear to be presented in a format that conforms with the Landscape Institute's guidance. Appendix 6.5 mixes both single frame and panoramic images, with no information provided concerning the scale of the images and the viewing distances. Furthermore, the resolution of the images available via the planning webpages is relatively low. The use of single frame images, at higher resolution, potentially utilising a 150% enlargement factor should be considered. The rendering of the development within the images may also require further consideration, as from what can be understood of the images at the resolution presented, there are aspects of the development that appear to be rendered in a manner that does not illustrate the worst-case scenario, in relation to the reflectivity (i.e. zinc roofs and glazing). Furthermore, based on the extent of glazing that is proposed, further evaluation of night-time effects may be needed, as these are not presently visualised. Moreover, there is some concern that the application has not sufficiently considered the lighting and night-time effects (N.B. The LVIA refers to the D&A Statement concerning mitigation of effects on dark skies through lighting design. However, the D&A Statement contains little information on this subject). We would emphasise the need for lighting across the site to be carefully considered, to minimise outward visibility of this. The production of a professional lighting assessment may be necessary to achieve an appropriate lighting scheme for the site.

Instead of responding to the detailed opinions of the LVIA at this juncture, we would like to focus on some specific aspects of the design that we consider could be amended, in order to explore whether a more acceptable adaptation of the design proposals could be brought forward. Our key points of feedback are as follows:

- The redevelopment of the hotel itself, which was one of the better received aspects of the previous design, has changed quite dramatically. The proposed frontage to Ferry Road appears too impactful, particularly due to the extensive glazing and some aspects of the architecture that are considered somewhat unsympathetic to the wider rural setting, e.g.:
  - It is suggested that the restaurant, spa and aspects of the glazed links be reviewed, alongside the introduction of 'softer' building materials and more green architecture along the frontage to Ferry Road. Concerning the southern 'wing', rationalising the bar and restaurant could reduce this element to being single storey, which would go some way to

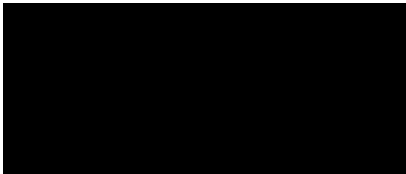
reducing the overall impact of the frontage. Alternatively, a revised design for the first floor could be considered, potentially setting this back further and removing the external terrace and glazed balustrades. In either case, reducing the perceived/actual scale of this element could be combined with a better balance between glazing and 'softer' features, such as green wall/roofs, timber cladding, etc. This amendment should be considered alongside changes to the proposed second storey glazed links between the central element of the hotel and the two wings, as despite being set-back these notably add to the impression of a continuous glazed frontage along Ferry Road. If, for example, these could be single storey links, or be revised to be predominantly green walls, the result could be a frontage in which glazing is less dominant.

- Concerning the spa building this appears to be too novel, particularly considering the sensitive location of this at the relatively exposed south-eastern corner of the site. A somewhat more conventional built form might be more appropriate, incorporating a pitched green roof, that could rise from a single-storey height in the south-western corner, to approx 1.5 storey height in the north-eastern corner. The roof should achieve a good degree of overhang and external facing walls would require appropriate materials e.g. timber or natural stone, interspersed with green wall elements within the elevations, particularly benefiting views from the south and west.
- There are aspects of the development that are considered to be too tall, particularly, the 3-storey villas to the west of the hotel and the 4-storey apartments. The villas are located in a relatively elevated position within the site, where development should be limited to a maximum of 2-storeys, making the redevelopment to the rear of the hotel of subservient scale. In our opinion, it would be appropriate for this amendment to be conducted in parallel with a reduction in the height of the apartments to a maximum of 3-storeys.
- The preference to provide the villas as a single crescent terrace of 20 units is not advisable, as this foreseeably results in a single building that is too dominant and bold. It appears that the design process considered separating the villas into smaller, separate units with varied roofs during an earlier stage and it is considered that this would be a more suitable approach, in combination with a reduction in height.
- In addition to amending the height of the crescent terrace of villas and apartment block, and distributing the villas in a more diffuse layout, it is considered that the visual impact of these could be further mitigated were some of the pitched sections of zinc standing seam amended to be green roofs, e.g. the leading pitches at the southern/western edges of the rearranged layout of villas and also the terrace of two-storey villas. Furthermore, depending on the positioning of the rearranged group of villas, there may be merit in using some green walls within those elevations that will be visible from the south and west.
- Overall, the development includes a large amount of zinc standing seam roofing. This material is relatively smooth and reflective and therefore likely to result in some heightened visual impacts, as compared to traditional, textured roofing materials. A review of the extent of standing seam roofing is therefore recommended.
- The development also includes numerous PV panels, particularly on top of pitched sections of the villa roofs and on the roof of the apartment building. There may be opportunities for some of the standing seam roofing to utilise an integrated PV system, rather than roof mounted panels. It is our understanding that flexible PV strips are available, which can be used on metal roofs as an alternative to mounted panels.

- Built development continues to push toward the edges of the site, with the majority of new planting seemingly being proposed between the villas and hotel complex and along the frontage to Ferry Road (as stated earlier, the provision of a landscape strategy for the site, including onsite and offsite planting, would aide review of this topic). Based on the information provided it appears that enhanced planting is likely to be required, particularly toward the southern boundary. Furthermore, revising the layout of the villas (as suggested above with specific reference to the crescent terrace) could result in additional soft landscaping being more widely dispersed across the central area of the site, rather than being bracketed between the tallest buildings.

In conclusion, it is the opinion of the AONB Team that there is some considerable way to go before the submitted proposals could be regarded as an acceptable solution. We remain open to considering amendments and hope that the applicant and their design team will take substantive positive steps to review the design in light of our concerns.

Yours sincerely



Richard Brown CMLI  
Dorset AONB Landscape Planning Officer