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BR/ref



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Dear Huw,

KNOLL HOUSE HOTEL, FERRY ROAD, STUDLAND – REVISED SCHEME - PRE-APPLICATION

Further to recent discussions, I am pleased to submit with this letter the emerging proposals for a revised redevelopment scheme at Knoll House Hotel. We would very much welcome the Council's feedback on these proposals at this pre-application stage.

Please find attached with this letter the following:

- *Knoll House – Pre-Application Presentation (Rev 06, July 2022)*
- *Site Location Plan*

A summary of the revised scheme is set out in detail within the accompanying presentation pack, prepared to address the reasons identified for refusing App Ref: 6/2018/0566 in February 2022. The proposals represent a reduction in scale compared with the previous scheme and include:

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

Background and Context

A full planning application (ref. 6/2018/0566) was submitted on behalf of our client, Kingfisher Resorts Studland Ltd. ('the applicant') in November 2018 for the redevelopment of the hotel. The application was subject to Environmental Impact Assessment (EIA). In response to consultation feedback an amended application with an Environmental Statement (ES) Addendum was submitted in September 2019. This application was refused at committee on the 9th of February 2022 for the following reasons:

- 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.*
- 2. The application site is located within 400m of protected heathlands and C3 use is proposed. Mitigation measures have been identified but do not address all matters and have not currently been secured in perpetuity. In this instance there is no overriding public interest and as such it cannot be certain, on the evidence presented, that the proposal would not adversely affect the integrity of the Dorset Heathlands European sites and international sites. Or, for that matter the Poole Harbour due to increase recreation in the harbour. The proposals are therefore contrary to Policies DH (Dorset Heathlands) and PH (Poole Harbour) of the Purbeck Local Plan Part 1 and Dorset Heathlands Planning Framework (2020 – 2025) SPD, Nitrogen Reduction in Poole Harbour (SPD 2017) and Poole Harbour Recreation Supplementary Planning Document (SPD) and the aims and objectives of the NPPF especially paragraphs 180 and 182.*

Revised Scheme

Following the refusal of the previous application and the extensive dialogue with key stakeholders (during the course of the determination), in particular Natural England, the National Trust and the Council, the applicant is seeking to address the matters of concern by way of a revised proposal. A landscape-led concept has been developed and a new team of architects has prepared a fresh architectural design approach.

The ways in which the revised scheme addresses the previous key areas of concern are as follows:

Major development within the AONB

The previous application was considered by the previous Case Officer to be ‘major development’ within the AONB due to its size, scale and impacts and was assessed not to pass the three tests for acceptability at paragraph 177 of the NPPF. The Case Officer concluded that the proposal would compromise the special qualities that underpin the AONB’s designation, albeit did recognise the need for the scheme and that it could not be accommodate outside of the designated area.

In response, the revised design has taken a strongly landscape-led approach to the form and layout, focussing on low density site coverage and integration into local context. A central open green space is proposed with the accommodation designed around it, interwoven with planting and landscaped pedestrian routes. Semi-extensive green roofs are proposed to most of the buildings to promote biodiversity and reduce visual effects of the development. As previously the site would be surrounded by the retained trees with the adjacent woodland to be enhanced via a woodland management plan.

In terms of heights, responding to the topography, the majority of the buildings are proposed at 1-3 storeys with lower heights at 1-2 storeys to the south of the site in order to retain key distant views to the site and coastline. The overall quantum of development proposed has been reduced and the mix of accommodation types altered to enable lower density of massing across the site:

Previous scheme:	Revised Scheme:
30 bed hotel	30 bed hotel
41 apartments	22 apartments
6 villas	26 Villas
16 maisonettes	0 maisonettes

This has resulted in a reduction of 15 units, and a proportionate reduction in communal and leisure space accordingly.

As shown on the viewpoint analysis the proposals are not considered to give rise to adverse effects within the AONB and the landscape-led design upholds the special qualities of the AONB's designation.

Impacts on Designated Sites

The second key area of concern with the previous scheme was the opinion that the scheme would have the potential to give rise to significant adverse effects on nearby European and Internationally designated sites. In particular, the Dorset Heathlands Special Protection Area (SPA) / Ramsar site (also designated as Studland & Godlingston Heath Site of Special Scientific Interest (SSSI), Dorset Heath and Studland Dunes Special Area of Conservation (SAC) and Poole Harbour SPA / Ramsar / Site of Special Scientific Interest (SSSI).

The contention was that under the previous application, the scale of development proposed would lead to a net increase in guests and people residing on site and therefore there would be additional recreational impacts on designated sites. Under the revised scheme there is predicted to be 296 people residing on site compared with the current potential occupancy of 339 under the existing hotel arrangement. A reduction of 43 people.

The existing staff accommodation (capacity of 66) would be removed as part of the redevelopment and the scheme prepared alongside a detailed staffing strategy, including sustainable transport strategy.

Whilst agreement was not previously reached with Natural England regarding the extent to which staff could be accommodated within the assessment, it was recognised that some could be. Discussion is ongoing, with the aim of reaching agreement on the issue prior to submission of a planning application.

The proposed reduction in capacity of the site will also aid the assessment of nutrient impacts on Poole Harbour. If agreement can be reached with Natural England in respect of recreational impacts derived from the capacity of the proposals, the same conclusion will be reached in respect of a nutrient budget. Again, discussion will continue directly with NE on this issue.

The inclusion of some C3 accommodation remains, as before. This is a matter which the applicant has provided a number of submissions on previously. It is commonplace within planning for C3 tourism accommodation to be controlled by use of occupancy restrictions. The proposed layout provides family accommodation that is set out in a way which is intrinsically linked with the hotel and leisure

in terms of access arrangements and servicing. As such it would not be appropriate to being used as private residential dwellings which was previously raised as a concern. It is integrated within the proposed resort.

Natural England have previously referred to the C3 units as self-catering accommodation. However, in practice, they will not function as such. They will form part of a luxury resort where guests demand space and flexibility. The C3 units will continue to be operated, including servicing, in the same way as the hotel accommodation and guests will book them on a half or full board basis, with flexibility to dine (on a private or informal basis) in their own villa or apartment.

Socio-economic Benefits

The substantial social and economic benefits of the redevelopment of this site were acknowledged through the determination of the previous application. An initial construction investment of approximately £40m (£15m GVA) and a year-on-year boost of £8.5m GVA of direct and indirect spending locally. 152 direct and 81 indirect jobs created. The revised scheme will continue to offer these significant benefits for the local area and sub-region which would be realised in the short-term. Work is ongoing to understand how the changes to the proposals and the time elapsed will have affected the social and economic benefits of the proposal. Whilst the scale of development may have reduced, the sums referred to will have been subject to inflationary pressure which may result in some change, but not significantly so. It remains, that the proposals will result in major investment in the local area, including job creation.

The full package of enhancement measures offered by the scheme can be secured in the usual way via a combination of planning conditions and S106 agreement.

Emerging Policy

The Purbeck Local Plan was originally submitted for examination in January 2019. Following further rounds of modifications, hearing sessions are currently ongoing.

The draft policy of particular relevance to this application remains Policy E8 which states that tourist accommodation developments that involve a net increase in dwellings “will not be permitted within 400 metres of heathland, as shown on the policies map, unless, as an exception, the type and occupier of residential development would not have an adverse effect upon the sites' integrity (e.g. nursing homes such as those limited to advanced dementia and physical nursing needs)”.

It is our contention that the regeneration of the Knoll House Hotel should be considered as an exception under this policy given that it is a brownfield site with ageing building stock urgently in need of replacement to bring it up to modern standards. As set out above, the quantum of development proposed would not result in a net increase of visitors compared with existing and the environmental enhancements package proposed will deliver an overall betterment particularly when combined with far more energy efficient building stock.

The use of the proposal, as a principle, was not previously contested by officers and the use of planning conditions was suggested to ensure that there was not departure from the use of the site as a tourism destination, rather than a location for principal residences. The applicant has, and continues, to support this approach.

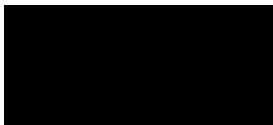
Conclusion

In summary, we welcome our continued dialogue with the Council and stakeholders on the redevelopment opportunity of this site and look forward to receiving your feedback on this pre-application submission. We would also welcome the opportunity to talk through the scheme with Officers and answer any questions. We also continue to engage with key stakeholders, such as Natural England and the National Trust, directly. However, we would welcome the assistance of the Council in arranging a meeting with the AONB Management Board to discuss matters relating to landscape impact. Similarly, it may also be considered productive to have joint meetings with other stakeholders.

I would also welcome an indication of the fees you consider to be appropriate in facilitating proportionate and effective pre-application engagement with officers.

I look forward to hearing from you once you have had a chance to consider matters. In the meantime, please let me know if you would like to discuss any of the issues raised in more detail.

Yours sincerely



Ben Read MRTPI
Director