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(Via email)

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Dear Huw,

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 the submission of the detailed planning application in November 2022, the applicant has been reviewing respective consultation responses received. Accompanied with this Covering Letter is a pack of amendments proposed to the planning application, to address those comments received. The letter also provides an overview of the key changes made and, where necessary, a direct response to matters relevant to the determination of the planning application. It should be read alongside the following information enclosed:

- Design and Access Addendum, dated 2023;
- LVIA Views document, July 2023;
- The following Plans:
 - Site Ground Floor – Proposed (AWW-SI-00-DR-A-20002-P011);
 - Site Lower Ground Level – Proposed (AWW-SI-LG-DR-A-20001-P09);
 - Site Roof Plan – Proposed (AWW-SI-RF-DR-A-20003-P07);
 - Extended Site Sections (AWW- SI-ZZ-DR-A-35000-P06);
 - Extended Site Sections Sheet 2 – (AWW-SI-ZZ-DR-A-35001-P04);
 - Hotel Ground Upper Floor – Proposed (AWW-T3-00-DR-A-10003-P07);
 - Hotel First Floor – Proposed (AWW-T3-01-DR-A-10004-P07);
 - Hotel Basement – Proposed (AWW-T3-B1-DR-A-10001-P06);
 - Hotel Lower Ground – Proposed (AWW-T3-LG0DR-A-10002-P06);
 - Hotel Roof – Proposed (AWW-T3-RF-DR-A-10006-P06);
 - Hotel Elevations – Proposed (AWW-T3-X-DR-A-30001_P07); and

- Hotel Sections – Proposed (AWW-T3-X-DR-A-3002-P05).
- Landscape Visual Impact Assessment Addendum, July 2023;
- Revised Drainage Strategy, July 2023;
- Drainage Strategy Plan (No: KHS-PPC-XX-XX-DR-C-0210 P3); and
- Ecology Solutions Response.

It is pleasing to see that a number of the consultees recognise the principle of redeveloping the Hotel, to bring it up to a standard required in the modern tourism market. The buildings are in need of renewal, which is also a matter without dispute. The substantive amendments made relate to the scale of the development, removing the four-storey component of the scheme. In turn, this has resulted in a reduction in the capacity of the proposal, removing 4no apartments or 16no bed spaces. There will also be a reduction in the level of employment, albeit the proposal will continue to make a substantial contribution to the local and wider county economy delivering a high-class tourism facility that Dorset can be proud of. The amendments also include changes relating to the detail of the scheme, such as material specification and the extent of glazing. These are set out in more detail as part of the accompanying DAS Addendum, prepared by AWW.

The applicant has sought to engage with the issues raised, continuing discussion with those stakeholders who are willing to do so. This is reflected in the revised proposals. It is hoped that the scheme can be supported moving forward and a positive resolution to the accompanying planning application reached. This covering letter provides an overview of the key issues pertinent to the amendments and planning application moving forward. It is considered that the planning policy analysis set out in the Planning Statement, October 2022, remains relevant.

The Proposal

The proposal seeks planning permission for the comprehensive redevelopment of Knoll House Hotel. The description set out as part of the planning application remains unchanged. However, the scale of development proposed has been revised, following the removal of the fourth storey of apartments. This has resulted in the removal of 4no 2 bedroomed apartments. Accordingly, the proposal includes the following:

- A 30 bedroom hotel;
- 18no apartments – a reduction by four;
- 26no villas; and
- 75 parking spaces – a reduction by four.

Further amendments have also been proposed to facing materials and a reduction in glazing to respond to comments raised. The southern end of the ‘crescent’ of villas has also been revised, to soften its appearance.

The proposed amendments do not require any change to the description of development set out as part of the planning application. It is also considered that there is no need to amend the extent of information before the Council, in the context of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. This is considered further, below.

Change in Capacity

The amendments to the proposal have resulted in the removal of 16no bed spaces (4no 2b4p apartments). However, it will also result in the reduction of employment, conservatively estimated at a reduction of 4FTE positions (a reduction from 116 FTE to 112FTE). Table 1, below, provides a relative assessment of existing and proposed overnight accommodation.

Table 1: Existing and Proposed Capacity

	Existing	October 2022 Proposal	July 2023 Revised Proposal
No. of keys	163 (106 Guest and 57 Staff)	78 (30no hotel and 48 villas/apartments)	74 (30no hotel and 44no villas/apartments)
No. of staff living on site	66	0	0
No. of guests	273	296	280
Total	339	296	280
Difference vs existing	0	-43	-59

It is recognised that comments have been raised in respect of how existing staff may use the surrounding heathland and other designated areas locally and whether there is potential for future staff to have a recreational impact on the local area. However, there are a number of material factors in how this issue is assessed in considering any potential for impacts, including:

- None of the proposed staff will be living on site, as they do currently;
- After redevelopment, staff will live within the community and will utilise the staff transport to access the site, this will constrain any ‘dwell time’ in the local area before and after work (this will also be a contractual matter), it may also mean, in a number of cases, that staff are accounted for within the existing community and will not be ‘net additional’ people; and
- The Staffing Strategy focuses on more local recruitment (apprenticeships and career training), whereas existing contracts are predominately temporary with many staff recruited from abroad, which necessitates on site accommodation.

The changes in staffing strategy and removal of on-site accommodation will substantially remove the opportunity of staff to utilise the heathland for recreational purposes in conjunction with their work at Knoll. Notwithstanding this, the nature of the existing on-site accommodation is also relevant. Existing staff have no onsite amenity area (no lounge, no communal space, not garden), which heightens their desire to actively seek alternative means of recreation, this is consistent with the survey results which identify a high usage of the surrounding area for recreational purposes.

There will be a significant reduction in overnight capacity following redevelopment from 339 currently down to 280 (a reduction of 59 people). Whilst staff numbers may increase, their opportunity to access the local heathland for recreational purposes will be much reduced, from a staffing cohort accommodated on site who's circumstances encourages recreation in the local area, to a cohort who will be actively managed away from the local area outside of working hours.

The reduction in accommodation on the site is consistent with the redevelopment model to introduce luxury accommodation which offers more space per guest, rather than an intensive regime of a greater number of visitors at cheaper rates.

The existing hotel is opened 12 months of the year and has been since it was acquired by Kingfisher in 2017. Whilst comments have been raised in respect of a shorter operational season, that is no longer the case. In practice, the gaps between peak, off peak and shoulder seasons has been narrowing and whilst there will always, inevitably, be variations in demand, when assessing existing and future development scenarios will be comparable.

The proposal also significantly reduces the level of car parking on site from 86no spaces currently to 75no spaces. These will be reserved for guests only. This will further limit the opportunity for staff to access their place of work other than by the formal transport provisions (the staff bus) which forms part of the proposal.

Landscape Visual Impact

The Landscape Visual Impact Assessment Addendum (the LVIA Addendum) prepared by Richard Sneesby, provides an update to the full LVIA, which comprises part of the Environmental Impact Assessment. It includes updated LVIA views with photomontages.

The LVIA Addendum recognises the beneficial effect the amendments will have in LVIA terms, but given the distance of the visual receptors, the changes do not alter the findings of the October 2022 Assessment.

EIA Development

The planning application was submitted alongside a detailed Environmental Impact Assessment. It was considered to provide sufficient information against which to assess the potential for the development proposed to have environmental impacts. The reduction in scale and quantum proposed as part of these revisions is not considered to prejudice the assessment of potential effects undertaken. They also do not change the conclusions reached. If, however, the LPA is of the opinion that the Statement requires supplementing with further information, as set out in Regulation 25, the LVIA Addendum is capable of comprising 'further information' referred to in the Regulations. It has been prepared using a consistent methodology, in updating its findings.

Control Over Use

The proposal includes provision of new holiday accommodation which will function as part of a boutique resort. The servicing and operation of the resort has previously been set out in the submitted Operations Report.

The applicant recognises that it would be appropriate to control the use of the proposed holiday accommodation in a robust form, to ensure that it continues to function as part of the resort. This is commonly secured by way of a planning condition. Similarly, a comparable form of control could also be included within a Planning Obligation (legal agreement). The applicant is agreeable to this approach and there has been discussion with officers on this matter

Woodland Management Plan

It is recognised that the Woodland Management Plan has not been updated since the submission of the original planning application and it will be necessary to do so to reflect an evolution in management strategy since. It is considered that this could be reasonably secured by way of a planning condition.

The proposal approach to Woodland Management will reflect the strategy of succession planting and management to retain the woodland adjacent to the site.

Drainage

The drainage strategy proposed includes an opportunity to introduce a controlled discharge and sustainable drainage systems. It will result in beneficial effects when compared to the existing situation and has not raised any objection from the drainage officer. It is also recognised that the proposal will be nutrient neutral. This includes improving the quality of surface water drained off site, by sustainably filtering water through a sustainable treatment train, including permeable paving and filtration. There is no mechanism in place to treat surface water currently.

However, comments have been raised about the direction of the surface water discharge which will run north, as per the existing situation. A southern discharge has been expressed as the preference. This has now been incorporated into a revised Drainage Strategy and plan.

Summary and Conclusion

The amendments proposed include the removal of the fourth storey of apartments and a total of four apartments (all 2b4p) from the proposed resort inventory. The reduction in scale of development will have further beneficial effects in long distance views, which raised comments from consultees previously. The findings of the visual impact assessment are set out in the accompanying LVIA Addendum and DAS Addendum, respectively.

Similarly, the capacity of the proposal will also be reduced. A total of 16no bedspaces will be removed as a result of the amendments and approximately 4no FTE positions. Whilst the reduction does not change the conclusions reached in respect of the significant socio-economic benefits which will be derived from the scheme, the proposal now includes a significant reduction in the overnight capacity of the site when compared with the current hotel, a total of 59 fewer residents and staff. Alongside a programme of proposed enhancements, such as education packs, control over the number of dogs on site when compared to existing, a woodland walk and limiting permeability to the heathland, the proposal will have a positive effect on the nature conservation objectives for the area.

It is requested that the Local Planning Authority progress consultation on these revisions as part of the determination of the planning application. It is considered that proposal represents a high-quality development which will be an asset for Dorset, representing a sustainable and responsible approach to the tourism market of the area.

Yours sincerely



Ben Read MRTPI
Director