

Planning Statement

Knoll House Hotel, Ferry Road, Studland BH19 3AH

Prepared by Black Box Planning
on behalf of Kingfisher Resorts Studland Ltd



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Appendix 1: Proposed Site Levels for Original Redevelopment Scheme

Appendix 2: Proposed Site Levels for Revised Redevelopment Scheme

1. Introduction

1.1. This Planning Statement has been prepared by Black Box Planning Ltd on behalf of Kingfisher Resorts Studland Ltd (the applicant) in support of Full planning application for the redevelopment of Knoll House Hotel, Ferry Road, Studland (the 'Site'), which seeks full planning permission for:

- The erection of a new hotel extension to include 30 hotel rooms and ancillary accommodation;
- 22 apartments;
- 26 villas;
- Spa and outdoor pool;
- 79 parking spaces
- 36 cycle spaces; and,
- Associated landscaping, public realm, biodiversity enhancements, drainage, access and servicing infrastructure.

1.2. The proposed description of development, for the purposes of the accompanying planning application will be:

'Redevelopment of existing hotel to provide new tourist accommodation including: 30 bedroom hotel, apartments and villa accommodation, associated leisure & dining facilities'

1.3. The application has been prepared following the decision to refuse planning permission (ref: 6/2018/0566) for a slightly larger proposal, in February 2022. However, the revised proposals seek to address the reasons previously identified. In doing so, have adopted a fresh approach to the form, design and scale of the development proposed.

The Applicant

- 1.4. With their unique knowledge of the tourism sector, Kingfisher Resorts Studland Ltd (referred to hereafter as Kingfisher Resorts) are committed to delivering and operating a high-quality, well designed holiday resort that contributed to both the local community and the economy.
- 1.5. The future operation of the proposed resort is a material consideration in the determination of this planning application. It has played a key role in the design development and the scale of development proposed to underpin its delivery. As Kingfisher Resorts redevelop sites to operate themselves in the long-term, creating a resort which is sustainable in economic, social and environmental terms is the key focus of this proposal. The accompanying Operations Report provides an overview of the approach to operating the proposal to be adopted by Kingfisher. In addition, it sits alongside a sustainable Staffing Strategy.
- 1.6. Kingfisher Resorts are experienced in redeveloping sites in highly sensitive locations and take pride in creating successful resorts which integrate and respond sensitively to the surroundings in which they sit.
- 1.7. They recognise the valuable contributions local residents can have in creating an integrated and sustainable development within their community and this has been key to their approach with engaging the public.

The Proposal

- 1.8. The proposal seeks to deliver a high-quality tourism development that will secure the role of Knoll House as an asset to the tourism offer in Dorset and the wider South West region. It will provide the basis of a sustainable business in the long term. In essence it will provide a modern equivalent to the initial conception of Knoll House as a tourist destination.

- 1.9. Following a detailed review of the previous scheme, this revised proposed, has sought to retain the core elements of the scheme, delivering substantial economic and social benefit to the locality, but doing so in a more effective manner, with greater focus on the environmental components of sustainable development.
- 1.10. A full description of the proposal is set out in the accompanying Design and Access Statement prepared by AWW.
- 1.11. This Planning Statement considers the proposal in the context of the adopted Development Plan, having regard to relevant policies and, where relevant, other material considerations including the emerging Purbeck Local Plan and national policy pertinent to the determination of the accompanying planning application. It demonstrates that the principle of development is entirely appropriate and the development proposals will deliver a range of social, economic and environmental benefits and in doing so, constitutes sustainable development, in accordance with the Development Plan and the National Planning Policy Framework (NPPF).

Content of the Planning Application

- 1.12. The planning application has been prepared alongside a suite of detailed assessments and supporting information, set out in the accompanying Document List.
- 1.13. In addition, in light of the Environmental Impact Scoping Opinion received from Purbeck District Council on, 19th June 2018 and irrespective of the environmental assessment information already held by the Local Planning Authority, in respect of the Site, the decision was taken to prepare a new Environmental Impact Assessment, having regard to the scope previously agreed. This provides a consolidated assessment wholly relevant to the current scheme.

2. Site Description and Context

The Site

- 2.1 The Site was built in the early 1900s and subsequently became a small country hotel in 1931. During the Second World War the hotel was requisitioned for troops erecting beach defences and following the war the hotel reopened in 1946.
- 2.2 The Site covers an area of 2ha and is located 400 metres inland of Studland Bay. The hotel and grounds lie to the west of Ferry Road, which connects the village of Studland to Studland Beach and the Shell Bay ferry terminal 2.5 miles to the north. An additional recreational area operated by the hotel and accommodating tennis courts and a small golf course, alongside general recreational space is located to the east of Ferry Road.
- 2.3 There are currently approximately 30 buildings onsite including the main hotel building, additional accommodation, an indoor swimming pool and storage sheds, in addition to a significant amount of hardstanding which make up the site access and site car park area.

Existing Use

- 2.4 Currently, the hotel comprises of 106 guest bedrooms alongside ancillary facilities such as indoor and outdoor pools and restaurant.
- 2.5 Traditionally, and prior to Kingfisher's acquisition in 2017, the hotel operated seasonally, closing for a period in the winter. Staff have been predominantly employed on a contract basis, arriving when the hotel opened and leaving the area again when the hotel closed. This necessitated the provision of 57 on-site staff accommodation units, in addition to the 106 hotel rooms for guests and equating to 163 rooms in total.

- 2.6 The Hotel is now operated year round, and has been for five years. The year on year occupancy during the shoulder and off peak seasons have shown steady growth, save for the interruption by Covid and the associated lockdown.
- 2.7 An overview of the maximum existing occupancy rates is set out in Table 1 identifying that the existing capacity of the Hotel amounts to space for 339 staff and guests to reside on site.

Surroundings

- 2.8 The Site is immediately bordered to the east by the B3351 Ferry Road, with land associated with the hotel beyond, accommodating an informal golf course, tennis courts and space for informal recreation. To the immediate south are open fields and to the west and north are heavily wooded areas. These areas are held on a long-term lease from the National Trust, the boundaries of which are shown on the Site Location Plan.

Access and Parking

- 2.9 The car parking spaces currently provided on site are informal and unmarked. Vehicles utilise gravelled areas to the west and block paved areas near to the existing buildings. It has been estimated that existing parking areas would allow for 86 vehicles to be parked within the whole site. Parking has been estimated using a topographical survey of the existing site, assuming spaces measure 2.4m x 4.8m with a 6m clearance.

Constraints

Ecology and Landscape Designations

- 2.10 The Site is located within the Dorset Area of Outstanding Natural Beauty (AONB) and in close proximity to the Dorset Heathlands Ramsar site, the Studland and Godlingston Heaths Site of Special Scientific Interest (SSSI), the Dorset Heaths (Purbeck and Wareham) and Studland Dunes Special Area of Conservation (SAC) and the Dorset Heathlands Special Protection Area (SPA).

Topography

2.11 The Site is at a local high point at about 25m AOD, with the ground dipping in all directions. The crest of the hill is at the southwest portion of the Site at above 30m AOD, with the steepest slopes towards the northwest. The gradient is lowest towards the south.

Heritage

2.12 The accompanying Heritage Statement prepared by (EDP 2018), sets out an appraisal of principal heritage considerations pertinent to the Site and the surroundings. The Site lies within the Purbeck Heritage Coast and is in close proximity to the designated UNESCO World Heritage Site Dorset and Devon Jurassic Coast (Natural Site December 2021).

Flooding

2.13 There is no risk of flooding from the sea in the area, and no fluvial flooding anticipated within the redline boundary. However, a Flood Risk Assessment has been prepared alongside the current proposals.

Planning History

2.14 Of most relevance is the previously submitted redevelopment scheme that was coordinated by Black Box Planning on behalf of Kingfisher Resorts. A full planning application (ref. 6/2018/0566) was submitted in November 2018 for the redevelopment of Knoll House Hotel. This application was refused at committee on the 9th of February 2022 for the following reasons:

- *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.*
- *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.*

2.15 This current proposal has been prepared to address the previous reasons for refusal. It does so by adopting a fresh approach to the development proposed, including its scale, massing and appearance. In doing so, it has reduced the inventory of accommodation proposed by 15no units, reducing the scale of the buildings proposed and adopting a landscape led approach to the design. A detailed overview of the design rationale is set out in the accompanying Design and Access Statement.

2.16 The reduction in accommodation has also reduced the relative guest capacity, resulting in a clear reduction in capacity. Whilst a comparison between existing and proposed capacities was a matter of dispute historically, in the context of potential for adverse effects on the neighbouring Heathland, the issue is now much more conclusive with a total of 43 fewer people residing on site compared to the existing capacity.

2.17 Prior to this there is no preceding recent planning history, as previously discussed, the hotel has been extensively developed since its establishment in 1931. Buildings of varying architectural styles and appearances have been developed over the years, the historic planning applications submitted to redevelop the Site are listed below:

- In February 1990, planning permission (application reference: 6/1989/1133F) was granted to erect a first-floor extension to provide staff accommodation.
- In July 1987 planning permission (application reference: 6/87/402F) was granted to demolish the existing staff accommodation and erect a new building to accommodate the permanent and temporary staff.
- In October 1984 planning permission (application reference: 6/84/737F) was granted to erect a new detached health spa to the south of the main building.

3. The Development Proposal

3.1 The proposed redevelopment of Knoll House Hotel adopts a landscape-led design approach to deliver a high-quality leisure and tourism resort, more suited to the modern tourism market. The redevelopment would focus on the delivery of a high-quality tourist accommodation, with proportionate facilities to support a new development in a resort format, meeting the demands of the tourism market and provide high quality accommodation in a range of formats for guests to enjoy. Notwithstanding this, it will deliver a range of social and economic benefits to the locality, enhancing the variety, quality and availability of amenities on site, which will also be accessible to local residents (living within a defined catchment).

Uses

3.2 The redevelopment of Knoll House Hotel reconfigures the Site to provide a range of accommodation types including:

- Extension and refurbishment of existing hotel to provide 30 new hotel rooms (C1); and,
- Provision of 48 units of accommodation comprising garden villas (26 units) and holiday apartments (22 units) to provide a range of accommodation types (C3) and sizes to cater for families down to individuals. These, in operational terms, will function as part of the resort collectively. The accompanying Operations Report provides an overview of how these units will function.

3.3 The additional buildings proposed will also accommodate the leisure facilities associated with the operation of the resort including: indoor and outdoor pool, spa treatment facilities, jacuzzi and sauna/steam room, fitness studio, café/juice bar and fine dining restaurant.

3.4 A central garden area is proposed at the heart of the Site, allowing for informal recreational activity and relaxation, whereas the formal planting and landscaped area to the front of the hotel and adjacent to Ferry Road, will remain as existing to retain the character of the hotel frontage.

Design

3.5 The revised design has taken a strongly landscape-led approach to the form and layout, focusing on low density site coverage and integration into local context.

3.6 Additionally, the design process has principally incorporated sustainability into its approach, utilising the 'fabric first' concept as the key means of achieving sustainable practices. Promoting biodiversity and resilience to climate change are key considerations within the revised scheme. Key sustainable strategies to be implemented are:

- Additional tree planting;
- Providing green roofs for enhancing biodiversity and carbon sequestration;
- The reduction and attenuation of surface water run off through absorption by green roof substrate;
- Habitat creation for invertebrates; and,
- A community heating system.

Access and Parking

3.7 The existing access off Ferry Road is to be retained and will be used by visitors and delivery vehicles. The existing layout including kerb radii and visibility are sufficient to support all likely vehicles without detriment to the adjoining public highway. The priority T-junction has been subject to a full swept path analysis utilising the largest vehicles that will require access to the Site.

3.8 Servicing will be carried out entirely within the Site boundary and all vehicles will enter and exit the Site in a forward direction. A swept path assessment has been conducted demonstrating all servicing vehicles which will visit the Site and have been included within the appendices of the submitted Transport Statement.

- 3.9 The Proposed Development will slightly reduce the existing quantum of parking spaces on site. The existing provision of 86 parking spaces is informal and does not promote an efficient use of space, currently the number of spaces available is dependent on how considerably vehicles are parked on site. The new car parks shall accommodate 79 spaces and localise vehicles to a small number of locations within the site, and principally within the purpose designed car park.
- 3.10 In addition, with the capacity of the Site reducing and the removal of staff parking spaces there will proportionately be more car parking spaces available per key (a lettable unit of accommodation). In practice, the resort would not exceed 90% occupancy, even at peak times and this has been reflected in the number of available spaces on site. It should be noted that this assessment reflects highway usage and should not be conflated with the assessment of potential effects, which adopts a worst case scenario.

Landscaping and Boundary Treatments

- 3.11 The proposal has been designed in a manner which responds directly to the surrounding landscape character of the site. The use of green roofs and a low site coverage shall deliver an integrated built form, harmonious with its wider surroundings.
- 3.12 The landscaping strategy is an integral element in the delivery of the proposed redevelopment, it adopts a concentric ring structure, which was designed in conjunction with the key stakeholders to sensitively integrate the site with its surroundings.
- 3.13 The outer circle will reproduce the native character of the adjacent land through the use of local species to 'blur the edges' between the Site and its surroundings.
- 3.14 The inner circle shall adopt more formalised planting by way of a central open green space, which will form the heart of the site. Planted terraces and paved pedestrian routes shall be woven into the open green space to create a tranquil environment for guests to enjoy. Further details are outlined in the accompanying Design and Access Statement.

Ecology

- 3.15 There is an aspiration to incorporate ecological enhancements into the Site's development to augment the species-richness from what is currently existing. These items are identified on the Ecological Enhancement Plan prepared by Ecology Solutions. However, to be clear, the acceptability of the scheme is not dependent on them as mitigation to offset impact elsewhere. They have been included as enhancement as a matter of good practice.
- 3.16 To enhance the long-term management of the adjacent woodland a Woodland Management Plan has been prepared that will implement preservation measures. This is within an area currently leased from the National Trust, for the long term. It is considered that the provisions proposed align with the nature conservation objectives of the Trust and also Natural England.
- 3.17 Similarly, designated dog walking areas have been proposed to reduce the possible effects on designated sites.
- 3.18 Additionally, measures to increase staff and guests' knowledge and awareness of surrounding sensitive areas are to be implemented to further reduce potential impacts.

Proposed Significant Changes

- 3.19 Following the refusal of the previous application (ref. 6/2018/0566) and the continued dialogue with key stakeholders (during the course of its determination), in particular Natural England, the National Trust and the Council, the revised proposal has been prepared to comprehensively address all previous matters of concern. The summary, below, details how the revised redevelopment scheme has evolved, with regard to previously identified issues:

Height

- 3.20 The Site's topography is undulating, to better accommodate topographical variations across the Site the design approach proposes building levels reflective of these changes, whilst also considering previous height concerns. The revised Proposed Development shall adopt an integrated approach that establishes appropriate elevations, the majority of 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.
- 3.21 Appendices 1 and 2 are illustrative in showing the significance in the change of site elevation levels, the revised scheme's highest point shall be at 38.613m AOD (Figure 1), a decrease of 2.276m AOD from the highest proposed point of the refused scheme. Additionally, Appendix 2 portrays how the majority of building's elevations have been reduced from those proposed in the previous application.
- 3.22 The spa elevations have been decreased most significantly as this is the most exposed area of the Site, this reduction seeks to retain key distant views to the fullest extent. The proposed building's elevation is 27.636m AOD (Figure 2), a reduction of 5.474m AOD from building B1 at 33.110m AOD within the original scheme. A substantial reduction, alongside the fresh approach.
- 3.23 Unlike the refused scheme, units to the south of the Site shall be sunken by way of shielding them from wider viewpoints. Additionally, roofs and visible site boundaries shall be better integrated with the landscape through the use of primary landscape mitigation integrated within the design, this is considered to be extremely effective.

Capacity

- 3.24 The proposed redevelopment of Knoll House will change the way the Site operates as a resort, in terms of the range of accommodation types available to guests but will result in a decrease in the number of keys (number of accommodation units) from what was previously proposed and what is currently existing.
- 3.25 The new proposal has a reduction of 15 units, and a proportionate reduction in communal and leisure space accordingly.

3.26 As is observable in Table 1 below, the quantum of development now accommodates a significant decrease in on-site numbers.

	Full Capacity	Peak Season (August/ Christmas)
Existing Bedrooms	163 bedrooms in total (106 Guest bedrooms and 57 staff bedrooms)	90% Occupancy currently experienced = 147 occupied bedrooms
Existing no. of Guests/ Staff	Staff: 66 Guests: 273 <u>Total people on site:</u> 339	Staff: 59 Guests: 246 <u>Total people on site:</u> 305
Proposed Keys	78 Keys in Total	90% Occupancy Expected = 70 Keys
Proposed Guests	<u>296 Guests on site</u> (a decrease of 43 people on site from existing)	<u>266 guests on site</u> (a decrease of 39 people on site from existing)

Table 1: Revised Proposal Occupancy Rates

3.27 Observably, the amendments to the revised scheme result in a reduction in scale of both built form and capacity, directly addressing the Officer’s previous intensification concerns.

Impact on Designated Sites

3.28 Potential adverse impacts on nearby European and Internationally designated sites attributed to one of the main reasons for the refusal of the previous scheme. In particular, concern was centred around the impacts on the integrity on 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/ SSSI.

- 3.29 It was thought that the scale of development proposed would lead to an increase in guests and people residing on site and therefore would lead to additional recreational impacts on designated sites. As outlined in Table 1, under the revised scheme there is predicted to be 296 people residing on site at full capacity, compared with the current potential occupancy of 339 under the existing hotel arrangement, equating a reduction of 43 people.
- 3.30 It is also proposed the existing staff accommodation would be removed as part of the redevelopment, further reducing the Site's occupation capacity.
- 3.31 The inclusion of some C3 accommodation remains, as before. 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 such a way which is intrinsically linked with the hotel and leisure in terms of access arrangements and servicing.
- 3.32 Referring to the refused scheme Natural England have previously discussed the C3 units as self-catering accommodation. However, in practice, they will not operate 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.
- 3.33 A further reduction in the scale of the proposed redevelopment from the refused scheme is proposed with specific regard for potential impacts on designated sites. Whilst some trips to the designated areas around the Site are inevitable, it is now strongly considered there will be no adverse increase in the number of trips to the surrounding designated land, particularly due to the fact the internal facilities are to be upgraded to increase the self-containment of the Site.

Pre application Discussions

- 3.34 The refused scheme undertook an extensive engagement programme with key stakeholders and the Council throughout its determination period. These discussions have formulated guidelines through which the evolution of this proposal has subsequently followed.
- 3.35 A pre-application letter was sent to the Council at the start of August. Notwithstanding that no formal response was issued within the pre-application timeframe, there have been some positive informal comments exchanged that indicate the revised proposal has been positively received.
- 3.36 Some feedback from the Council has shaped the design of the scheme at various stages and has been influential in realising the final proposed design. As such, the scheme's design responds to its brief and issues that have been highlighted by the Local Planning Authority. The revised redevelopment has therefore been designed in such a way to provide an appropriate and positive contribution to the village of Studland, with close regard to feedback from the Council.
- 3.37 Pursuant to paragraph 42 of the NPPF engagement with other consenting bodies has enabled further consideration of the constraints relevant to the revised proposal. Continued informal engagement with key stakeholders, such as Natural England, has aided the progression of the redevelopment proposal, in keeping with the inputs from key consultees.
- 3.38 Additionally, engagement with the Parish Council and local community have been central considerations of the scheme. Prior to submission a Public Exhibition at Knoll House was well received by the community. The Statement of Community Involvement submitted with this application outlines this in further detail.
- 3.39 Alongside historic engagement, Kingfisher now have a detailed portfolio of comments and productive inputs from various stakeholders and the local community. This has helped to evolve the scheme.

4. AONB Major Development Considerations

- 4.1. The following Chapter sets out the scope of redevelopment for this proposal does not constitute major development in the context of the Area of Outstanding National Beauty.
- 4.2. The proposed redevelopment of Knoll House Hotel seeks to replace an existing tourist destination, with a modern luxury resort. The existing buildings are already visible within the landscape and are of deteriorating quality, without redevelopment there will be further decline. In doing so, the proposal rationalises the distribution of development, proposing buildings which incorporate primary landscape mitigation.

National Policy Context

- 4.3. As set out at NPPF 176 great weight should be given to conserving and enhancing landscape and scenic beauty in Areas of Outstanding National Beauty. It goes on to set out at NPPF 177 that:

When considering applications for development within National Parks, the Broads and Areas of Outstanding Natural Beauty, permission should be refused for major development⁶⁰ other than in exceptional circumstances, and where it can be demonstrated that the development is in the public interest. Consideration of such applications should include and assessment of:

- a) The need for the development, including in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;*
- b) The cost of, and the scope for, developing outside the designated area, or meeting the need in some other way; and,*
- c) Any detrimental effect on the environment, the landscape and recreational opportunities, and the extent to which that could be moderated.*

- 4.4. There is no definition of what constitutes 'major development', but NPPF footnote 60 sets out that:

'For the purposes of paragraphs 176 and 177, whether a proposal is major development is a matter for the decision maker, taking into account its nature, scale and setting, and whether it could have significant adverse impact on the purposes for which the area has been designated or defined.'

The Development Context

- 4.5. Knoll House Hotel is currently an operational tourist destination and has been for the last 90 years. Over that period, it has played a vital role as a vibrant holiday destination for many, providing access to the locality and coastal stretch of Studland and the surrounding area. However, the buildings are now in need of modernisation and are in poor condition and inefficient. The Hotel, from a commercial and operational perspective, needs to be modernised to provide a holiday destination which is fit for purpose in the existing holiday market.
- 4.6. Within the determination of the previous planning application, in assessing the impact of the proposal on the AONB, the AONB partnership response did not take into account the visual prominence of a declining building stock on the landscape. The 'do nothing' approach foresees far greater adverse visual impacts than appropriate redevelopment.
- 4.7. Additionally, the existing development associated with the hotel is contained within approximately 30 buildings covering a footprint of 4,817 sqm. In total the existing area of hard landscaping amounts to 8,283sqm across the Site area of 2ha. The proposal seeks to rationalise the Site area through the sustainably-led approach it adopts.
- 4.8. The role and character of the Site from a use perspective will not change as a result of the proposal. It is currently a tourism destination and will continue to be so, with a reduce number of people on site.

4.9. It is clear that in assessing development proposals, proper regard should be given to the development context as set out above. It is also incumbent on the decision maker, as set out at Footnote 60 of the NPPF, to have regard to the nature, scale and setting of the proposed development and whether it would have a significant adverse impact on the purposes for which the area is designated or defined. In this case, that is an already developed site, in declining condition, which is in use as a tourism destination, synonymous with the local area. It is not an undeveloped greenfield site.

Assessment of Proposal Against Major Development Tests

4.10. Knoll House Hotel is already a major previously developed site in the AONB that already features in viewpoints from the surrounding area. As such any assessment of whether it constitutes major development for the purposes of paragraph 177 should be in the context of the existing site and its active use.

4.11. The continued use of the Site for tourism purposes, the extent of existing structure, the proposed reduction in developed area of the Site and the use of primary mitigation within the design to lessen visual scale and appearance of development are all key considerations which lead to the conclusion that the proposal does not constitute major development. Notwithstanding this, when the three exception tests outlined in paragraph 177 are applied to the scheme, they can be satisfied. The tests are:

- The need for the development, in terms of any national considerations and the impact of permitting it, or refusing it, upon the local economy;
- The cost of, and scope for, developing outside of the designated area, or meeting the need for it in some other way; and,
- Any detrimental effect on the environment, the landscape opportunities, and the extent to which that could be moderated.

4.12. These are matters considered by the Planning Officer in respect of the previous proposal and set out in the Officer Report to Committee.

4.13. Within his report the Officer concluded that the previous scheme would satisfy tests (a) and (b) due to the significant and established economic benefits of the scheme and that the bespoke location of Knoll House was the prime reason for proposing redevelopment there. Regarding test (c) the Officer concluded that the proposed mitigation would not suffice moderating the adverse impacts upon the AONB. Citing the AONB Officer, it was highlighted that the built form proposed would undermine the special qualities that form the AONB's designation. The below sets out how this has been addressed with the fresh approach.

Need

4.14. The framing for this development test is around the identified need for housing and the economic benefits of a proposal. The Proposed Development will not contribute to the local housing land supply as the apartments and villas are to be rented solely as holiday accommodation, not on a permanent basis.

4.15. The proposed redevelopment is however supplementing an identified tourist economic input in the area. It constitutes an economic form of development. The need for additional tourism accommodation is linked to the growth of the local economy and also, directly, to the need to invest in Knoll House to make it fit for purpose in the tourism market.

4.16. Socio Economic Assessment set out in the accompanying Environmental Statement provides an overview of the likely economic impacts of the proposal. In doing so, it sets out an employment baseline assessment which identifies that tourism accounted for 10% of employment in Purbeck.¹

4.17. With regard to Gross Added Value (GVA), a measure of economic output, the proposal will result in £15 million and year-on-year of £7 million GVA of direct and indirect spending locally.

¹ The Economic Impact of Dorset's Visitor Economy (2020)

- 4.18. This was highlighted in the refused schemes Officers Report in which it was stated that there '*would be significant investment proposed into the Site and significant employment and indirect benefits.*' It is strongly considered this principle continues to apply to the proposed scheme as the GVA value is comparable to the refused scheme.
- 4.19. Additionally, the redevelopment of Knoll House proposes a model of development based on a resort, rather than the traditional hotel model. This includes a range of facilities to 'weatherproof' the attraction and therefore make it operational year round. This will underpin the provision of high quality facilities and stable employment for the local community, but also deliver a key missing component to the offer in the area.

The Cost and Scope of Developing Elsewhere

- 4.20. The proposal seeks the redevelopment of an existing site which is already tourist accommodation, it is location specific. Accordingly, regard should be given to the real context, in doing so it would be impractical to redevelop Knoll House in another location. Similarly, an alternative location would not address the required redevelopment of Knoll House in a commercially viable form to meet the demand of the modern tourism market.
- 4.21. Notwithstanding the above the proposal is also a coastal tourist resort, no alternative locations have been identified within reasonable proximity to the coast. The prospects of identifying an alternative location outside the AONB would be unrealistic as it covers approximately 60% of the former Purbeck District and 40% of Dorset, including almost the entire coastal area.
- 4.22. The proposed redevelopment of Knoll House is essentially a modernisation of the destination, seeking to deliver a resort of exceptional quality. The delivery of such a high-quality proposal would not be possible beyond the AONB as the economic benefits associated with the proposal area closely related to the unique location of the Site.

Effects on the Environment, Landscape Opportunities and Mitigation

- 4.23. As set out in national policy, developments should maximise the use of previously developed land to minimise the effects on the environment. In this case, the proposal has been accompanied by an Environmental Impact Assessment (EIA) following a screening and full scoping process. The conclusions drawn from the EIA demonstrate that the proposal is considered unlikely to give rise to significant effects on the environment.
- 4.24. Specific to the landscape a full LVIA adopts a robust approach to assessment and also concludes that there will not be significant adverse impacts on the designated landscape.
- 4.25. Whilst the previous proposal was concluded to be major development and was ultimately refused planning permission because the conclusion was reached by the decision maker that, by virtue of its scale, form and massing, it failed to ensure no detrimental impact on the environment and natural landscape. This relates to the bullet point of NPPF 177. Whilst that issue was contested by the applicant in that case, they have noted the reasoning and have adopted a fresh approach to the design of the proposed development.
- 4.26. This proposal adopts a wholesale change to the approach to scale, form and massing of the proposals. In the context of the existing development already on the site, it is considered that the effects are appropriate for the location and, in a number of instances, as set out in the accompanying Environmental Statement, are positive effects.
- 4.27. The proposal is consistent with and meets the major development tests.

Major Development Summary

- 4.28. Referring to the above the proposed redevelopment of Knoll House Hotel as proposed will not constitute major development in the context of paragraph 177 of the NPPF. The application site is not an undeveloped greenfield site, it already accommodates a large hotel. The assessment of major development should be considered in that context.

- 4.29. Notwithstanding the contention in respect of whether it is major development in the AONB or not, the proposal has been considered against, and meets, the exceptional tests set out at NPPF 177.
- 4.30. There is a clear need for the form of development being proposed in the local area, where tourism plays a major role in the local economy and there is a recognised shortage of high quality accommodation. A short term boost of £25m GVA with a further £7m boost year-on-year is significant, in addition, the creation of 152 permanent jobs in the local community represents a substantial economic package, as such there is a clear identified need for the Proposed Development.
- 4.31. There is no opportunity to deliver the Proposed Development in a n alternative location, as the AONB covers practically the entire coastal stretch of Dorset. The development proposed is the redevelopment of an existing tourism facility and, both commercially and operationally, the location on the coast are central components of viability.
- 4.32. In landscape terms, the accompanying LVIA and associated assessment of effects in the Environmental Statement provide a robust assessment of potential impacts. The mitigation measures proposed shall minimise the impact on the landscape more sensitive to the local context than the existing built form of the Site.
- 4.33. In light of the information set out in this chapter and presented in the application submission as a whole, there is no reason in the context of the AONB to withhold planning permission for the Proposed Development. It is consistent with the objectives of the NPPF, including paragraph 177.

5. Planning Policy and Context

5.1. The National Planning Policy Framework provides up to date Government policy for decision taking and plan-making, consistent with the Act. It places the presumption in favour of sustainable development at its heart and advises local planning authorities that in relation to decision making this means:

- approving development proposals that accord with an up-to-date development plan without delay; or
- where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:
 - i. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - ii. specific policies in the Framework indicate that development should be restricted (NPPF Paragraph 11).

The Development Plan

5.2. The starting point for the consideration of Knoll House Hotel must be the Development Plan, the status of its policies as well as any other material considerations which should be taken into account. In this case, the statutory Development Plan in the adopted Purbeck District Local Plan. At present, this comprises the Purbeck Local Plan Part 1: Planning Purbeck's Future (PLP1) (adopted in November 2012) and the Purbeck Local Plan Proposals Maps.

Purbeck Local Plan Part 1: Planning Purbeck's Future (November 2012)

5.3. The Purbeck Local Plan was formally adopted on 13 November 2012. Policy SD: Presumption in Favour of Sustainable Development is an overarching policy in favour of sustainable development in line with the NPPF paragraph 8 and the consideration of the three overarching objectives: economic development, social development and environmental protection and improvement.

5.4. The following policies within the Local Plan are also of relevance to the consideration of this application and are explored in further detail below.

Policy LD: 'General Location of Development'

5.5. Policy LD identifies a settlement hierarchy for the District, directing development towards the most sustainable locations. Studland is identified in the fourth hierarchical tier as an 'Other Village with a Settlement Boundary'. It should be noted that whilst the existing hotel site is located outside of Studland's Settlement boundary and therefore considered to be open countryside.

Policy SE: South East Purbeck'

5.6. South East Purbeck covers the area known locally as the Isle of Purbeck and is the focus for tourism within the district. It includes the settlements of Swanage, Corfe Castle, Langton Matravers, Church Knowle, Harmans Cross, Kingston Kimmeridge, Studland and Worth Matravers.

5.7. The policy reemphasises that to ensure new development is focused in the most sustainable locations, proposals in South East Purbeck and outside of settlement boundaries will be strictly controlled in accordance with Policy CO: Countryside.

Policy CO: 'Countryside'

- 5.8. Countryside is defined as all land outside settlement boundaries and therefore the application site falls within this consideration. This policy states that development outside of a settlement boundary will only be permitted when it does not have a significant adverse impact either individually or cumulatively in the environment visually, ecologically, or from traffic movements. The refused scheme was considered to be conflictive with Policy CO insofar that it would 'substantially increase the size and impact of the development'. As previously discussed, this redevelopment proposal shall further reduce the number of accommodation keys and shall replace the currently under used buildings with modern, attractive buildings more sensitive to the landscape character. This approach has evolved specifically to address this concern.
- 5.9. Additionally, effect of the Proposed Development on the surrounding landscape, ecology and local highway network is thoroughly assessed in the technical reports that accompany this planning application and in further detail in the submitted Environmental Statement. It is therefore considered that the revised proposed redevelopment of Knoll House Hotel is now in accordance with Policy CO.

Policy AH: 'Affordable Housing'

- 5.10. Policy AH requires developments that result in an increase of 2 or more dwellings or are on a site area of 0.05 hectares or more to provide 50% affordable housing contribution in Swanage and the surrounding coastal area. The proposed redevelopment of the hotel will improve the range of accommodation offered to guests and include the provision of some holiday apartments and villas, which will wholly operate as holiday accommodation alongside the hotel rooms provided and would not be used as a principal residence. As such, it would not be appropriate to provide affordable housing on site in this context.

Policy BIO: ‘Biodiversity and Geodiversity’

- 5.11. Policy BIO sets out that new development is required to ensure that there are no adverse effects upon the integrity of European protected sites including Special Protection Areas (SPAs), Special Areas of Conservation (SACs), Ramsar Sites and Sites of Specific Scientific Interest (SSSI). Due to the Site’s close proximity (within 400m) to several designated sites, an Environmental Impact Assessment has been undertaken to assess the impact of the Proposed Development on these designations.
- 5.12. An Environmental Statement (ES) has been submitted as part of this planning application. The ES also further sets out the conclusions of the assess of the direct, indirect and cumulative impacts relative to the significance of the nature conservation value of the surrounding designations, including a detailed assessment of ecology.
- 5.13. As such it is considered the proposed redevelopment of Knoll House Hotel complies with Policy BIO.

Policy DH: ‘Dorset Heaths International Designations’

- 5.14. Policy DH states that development will not be permitted unless it can be ascertained that it will not lead to adverse impacts upon the integrity of the Dorset Heaths International Designations. It also sets out the forms of development which would not be permitted within 400m of the protected heathland. In addition, it is stated that any development which includes the increase in C1 and C3 units may directly or indirectly result in an increased adverse impact on the heathland, should not be permitted. The aforementioned refused scheme was considered contrary to Policy DH as it failed to present evidence to demonstrate that the proposal would not *‘adversely affect the integrity of the Dorset Heathlands European sites and International sites.’*

5.15. Accordingly, this revised proposal has extensively engaged with various stakeholders as to how to address this important issue, as discussed in Chapter 3, the scope of development for the revised application has been scaled down to reduce the recreational impacts on the designated sites. This includes a reduction in the number of people residing on the site overnight. This is a significant reduction from the current capacity of 339 people to 296 following redevelopment. This quantitative assessment has been supported by qualitative considerations including visitor surveys and an assessment of operational matters, to understand how people currently use the site in the context of the designations and also how the change in 'offer' will retain more people on site for longer rather than encouraging use of the surrounding heathland.

5.16. In addition, the proposal also comes forward alongside a range of enhancements measures which will help educate and further reduce impact on the surroundings.

Policy FR: 'Flood Risk'

5.17. Policy FR seeks to manage the impacts of flooding and sets out the requirements for a Flood Risk Assessment (FRA).

5.18. The Site falls in Flood Zone 1 and as outlined in FRA prepared by Patrick Parsons the Site is not at risk of flooding, therefore the proposed redevelopment Of Knoll House Hotel is in accordance with Policy FR.

Policy D: 'Design'

5.19. Policy D sets out the criteria for ensuring high quality, sustainable design for all development. It is considered that the proposed redevelopment positively integrates itself through the delivery of a sustainable-led approach that delivers appropriate site layout and building design.

5.20. The refused application did not comply with Policy D according to the Officer's Report on the basis that it would fail to positively integrate into its surroundings due to an increased built form and greater height of development. As discussed above, the revised scheme proposes a design approach that robustly addresses concerns for integration utilising measures such as a low density site coverage and a significant reduction in the height and density of the proposed buildings. As such, we can now consider that the revised redevelopment of Knoll House Hotel is in compliance with Policy D.

Policy LHH: 'Landscape, Historic Environment and Heritage'

5.21. Policy LHH requires developments to conserve the appearance, setting, character, interest, health and vitality of landscape and heritage assets. The previous scheme was considered to conflict with policy LHH for the following reasons:

- Potential adverse impacts on the AONB landscape; and,
- Failure to effectively propose mitigation measure to enhance the character of the Heritage Coast.

5.22. The Landscape and Visual Impact Assessment has been submitted with the planning application which assesses the proposed redevelopment's impact on the designated AONB landscape. The accompanying ES also considers this impact in the form of an Environmental Impact Assessment. This concludes, following mitigation, no significant adverse landscape, seascape or visual impacts would arise in the long term as a result of the proposed redevelopment, this includes the AONB and Heritage Coast.

5.23. The submitted Heritage Statement sets out the findings of a review of relevant records related to heritage assets to assess the potential for the Proposed Development to result in a change to the setting of the surrounding designated heritage assets; and the potential for the Site to contain unrecorded archaeological remains and, if so, what their likely level of significance is.

5.24. The Site does not include any designated heritage assets, such as scheduled monuments or listed buildings. In the wider study area, there are two scheduled monuments, 24 listed buildings and one conservation area. Previously the Officer concluded that the refused scheme complied with Policy LHH inasmuch that there would be no significant impacts on designated heritage assets. It is strongly considered that this principle applies to the revised scheme and due to the amendments as discussed above the proposed redevelopment complies with Policy LHH.

Policy TA: ‘Tourist Accommodation and Attractions’

5.25. Policy TA emphasises the importance of the tourism and visitor economy as an input into the economy of Purbeck and how Purbeck will seek to build upon its position as a leading visitor destination through the promotion of visitor experiences of exceptional quality and distinction.

5.26. The policy makes reference to the Tourism Strategy for Purbeck (2008), which proposes that development which will help to diversify Purbeck’s accommodation and attraction assets to meet tourism trends should be considered in appropriate locations. The proposed redevelopment of the Site provides the opportunity to enhance an existing site of tourism accommodation by not only improving the quality for the accommodation on offer but also diversifying the accommodation types available for guests.

5.27. The existing hotel primarily offers accommodation of a ‘hotel room’ nature only. The redevelopment will allow the Site to include both hotel rooms suitable for individuals and couples, in addition to accommodation more suited to family holidays including ‘suite’ style accommodation in the form of apartments and villas. This diversification will provide added flexibility for guests and respond better to the tourism market demand.

5.28. Importantly, the proposal will also stem the steady decline in the existing hotel offer which, in correlation with the quality of the building stock, is changing to a lower market offer. The redevelopment of the site will deliver luxury accommodation and facilities. The aspiration of Kingfisher is for the proposal to be of unrivalled quality.

5.29. It is noted that the previous scheme did not comply with Policy TA according to the Officers report, as proposals shall only be supported by Policy TA provided they are consistent with Policy CO, which as discussed above, the refused scheme did not. Contrastingly, the revised scheme has developed to address the concerns held within Policy CO, as such it is now understood to comply with Policy CO and subsequently Policy TA.

Policy IAT: ‘Improving Accessibility and Transport’

5.30. Policy IAT seeks to improve accessibility in Purbeck through the better provision of local services and facilities that reduce the need to travel, especially by car. Although outside of the settlement boundary for Studland, the redevelopment proposed is on an existing Hotel site and previously developed land. Once operation, the resort aims to provide on-site facilities, including dining options, reducing the need for guests to leave the Site.

5.31. The development will maximise the use of alternative and sustainable forms of travel by improving the safety and convenience of travel by cycle and public transport in a number of ways:

- Secure cycle parking for employees, guests of the hotel and non-guests using the on-site facilities;
- Shower and changing room facilities for employees;
- A shuttle bus to be used by employees living in the local area and for guests to travel to nearby attractions; and
- Provision of sustainable travel advice to guests and visitors on the website and around the hotel.

5.32. The proposed redevelopment will also provide 79 car parking spaces on site. Based on an anticipated occupancy level of 90% at peak times, this is in line with the Dorset County Council Non-residential Parking Guidance.

5.33. It is noted that the previous proposal was considered to comply with Policy IAT. The proposed amendments to the scheme do not direct that an alternative conclusion is reached this time around. The approach to sustainable travel is entirely appropriate.

Neighbourhood Development Plan

5.34. Studland Parish has not begun to prepare a Neighbourhood Plan for the area to date. As such, there is no Neighbourhood Plan area covering the application site that provides policy guidance or allocations for the identification of housing or employment growth.

5.35. From the above assessment, the Proposed Development accords with the adopted Development Plan and therefore, in accordance with paragraph 11 of the NPPF should be granted planning permission without delay.

5.36. To comprehensively assess the planning balance, a range of additional material considerations have been considered.

Material Considerations

5.37. Paragraph 47 of the NPPF makes reference to the plan-led system and legal requirements for applications to be determined in accordance with the Development Plan, unless material considerations indicate otherwise. For this application, there are several other material planning considerations that need to be taken account of.

5.38. The Council are in the process of undertaking a Local Plan Review, the revised Purbeck Local Plan was due to be implemented in 2019. However, following examination, it has now been submitted for further rounds of modifications that are ongoing, albeit the plan is now at an advanced stage of preparation. It is considered in more detail, below.

5.39. Other material considerations will include the requirements of current supplementary planning documents, the NPPF and the National Planning Practice Guidance (NPPG) as well as the various technical reports and guidance published at local and national levels that have informed the preparation of the application and that are referred to within the relevant technical reports and the submitted Environmental Statement (ES).

Dorset Heathlands Planning Framework 2020-2025 Supplementary Planning Document

5.40. As set out in the Framework, Natural England have rising concerns relating to the intensification of residential development in South East Dorset and the resultant pressures placed upon the protected heathland by new occupants of these developments living in close proximity. A potential increase in public access to lowland heathland from nearby development, could lead to an increase in wild fires, damaging recreational uses, the introduction of incompatible plants and animals, loss of vegetation, soil erosion and disturbance by humans and pets having an adverse effect on the heathland ecology.

5.41. The proposed redevelopment of Knoll House Hotel will change the way the Site operates as a resort, decreasing the occupation capacity of the site and diversifying the types of accommodation available to guests. Traditionally, the hotel has operated seasonally with staff predominantly employed on a contract basis, arriving when the hotel opened and leaving the area again when the hotel closed. This necessitated the provision of 57 on-site staff accommodation units (providing accommodation for 66 staff), in addition to the 106 hotel rooms for guest and equating to 163 Keys in total.

5.42. As part of the proposal, the resort will operate on a year-round basis, with staff on permanent, full-time (or equivalent) contracts. As such, staff will be recruited from the surrounding area and accommodation will not be provided on site resulting in the risk of any recreational impact from anyone permanently residing on site being removed. The number of accommodation Keys proposed for guests is 78 in total, as outlined in Table 1 the Site's capacity can currently accommodate 339 people on site, whereas the proposal will reduce occupancy to 296 at full capacity.

5.43. The change to how the Site will operate as a resort is considered to be of benefit to the surrounding environment. Presently, the existing hotel offers a very limited range of onsite facilities for guests. With specific regard to eating options, currently all guests of the hotel eat at the one restaurant on site or travel off site to alternative options, predominantly by car. As part of the Proposed Development, 48 accommodation units will be C3 units with 'eat-in' options which will include a 'room service' and also a private chef/dining option, the proposals will also, include provision of two new dining options on site, reducing the need to travel to nearby towns by car. The increase in onsite facilities generally will significantly improve the self-containment of the resort, which is a key part of its business model and therefore seek to retain a high proportion of guests onsite. Whilst there will inevitably be a number of linked trips providing benefit to local expenditure it is not considered this will have a direct impact on the heathland given the existing use and mode of operation of the hotel currently.

5.44. In terms of the onsite facilities that will be available to be used by non-guests, such as the restaurant and bistro/café or fitness facilities, it is wholly expected that users will primarily be from Studland and the immediate surrounding area as these facilities currently do not exist within the vicinity, rather than from other urban areas where these facilities already exist. As such, users will already be living within close proximity to the Heathland and would not be adding to the visitor pressure solely by using the resort. However, the delivery of an additional recreation facility for use by residents in the local area may divert some existing use of the heathland to the resort.

5.45. Some positive design features and enhancements will also be beneficial in protecting the heathland, such as:

- Restricting access from existing paths to the west of the site, making it less permeable to the heathland;
- Introducing signage;
- providing education packs to educate guests on the sensitivity of the heathland and surrounding environment; and

- providing staff training.

5.1. Kingfisher would also like to deliver further enhancements, as set out on the Enhancement Plan prepared by Ecology Solutions. However, these are located on land within the long lease Kingfisher hold with the National Trust. Whilst measures could be secured by planning condition and Kingfisher are agreeable to them forming part of the development proposed, they will only be committed subject to Natural England and National Trust agreement by way of consultation response. The proposal is not reliant on them as a form of mitigation. The measures include:

- Implementing a Woodland Management Plan;
- Provision of a dedicated dog walking area;
- Mire restoration in the woodland to the west of the hotel; and
- Additional planting.

Purbeck Local Plan Review

5.1. NPPF Paragraph 48 states that Local planning authorities may give weight to relevant policies in emerging plans according to:

- the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given)

5.2. The Draft Local Plan has not yet been adopted but is projected to do so by early 2023, as such the relevant emerging policies relevant to the Proposed Development have been examined. Referring to the above and National Planning Guidance (Paragraph 049 Reference ID: 61-049-20190315) document, the emerging policies have been attributed weight according to their stage of preparation.

Policy E1: ‘Landscape’

5.3. Policy E1 establishes that development, other than major development, shall be permitted in the AONB provided the proposals are sympathetic to their character. As outlined above, it is not considered that the redevelopment of Knoll House Hotel constitutes major development. It is a previously developed site which already accommodates a large development. The condition of the existing site is the correct baseline from which to consider the issue of major development, not considering it as akin to an undeveloped greenfield location – which clearly it is not.

5.4. The conspicuous and sightly existing building already have an impact on the landscape character. The revised design, which now forms the subject of the accompanying planning application, has evolved to specifically reduce impact to the wider landscape, providing opportunity to deliver a range of enhancements and benefits. In doing so, the proposal is consistent with emerging Policy E1.

Policy E8: ‘Dorset Heathlands’

5.5. Policy E8 states that tourist accommodation developments that involve a net increase in dwellings will not be permitted within 400 metres of heathland, *unless, as an exception*, the type and occupier of residential development would not have an adverse effect upon the Sites' integrity. The regeneration of Knoll House is consistent with the exception provisions within E8. The existing hotel already has an impact on the surrounding area, including the Heathlands given its existing use. In quantitative terms, the proposal will reduce the number of people staying overnight on the site. In qualitative terms, the proposal will also operate in a more considered basis providing a greater range of onsite facilities to retain guests and providing alternatives to recreational activity on the heathland. The result will be to have positive effects upon the integrity of the heathland.

5.6. The Proposed Development complies with emerging Policy E8.

Policy E12: Design

5.7. Policy E12 outlines the design principles the council expects all new development proposals to demonstrate. Of key importance is that proposals positively integrate with their surroundings and reflect localised traditions through the use of local building materials. Additionally, it is highlighted that new developments should make efficient use of land taking into account the capacity of existing infrastructure, access to sustainable means of transport, the local area's prevailing character and the requirement to deliver high quality places. The proposed redevelopment's bespoke design has evolved with close regard to these principles, as such the scheme is considered to be in accordance with emerging Policy E12.

National Planning Policy Framework, July 2021

5.8. The NPPF aims to strengthen local decision making and reinforce the importance of up-to-date plans. The policies are material considerations when determining planning applications.

5.9. The NPPF sets out the Government's planning policies for England and how they will be applied in terms of securing sustainable development. The NPPF is underpinned by a presumption in favour of sustainable development.

5.10. Paragraph 7 of the NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. The NPPF states that the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs. Paragraph 8 confirms that there are three overarching objectives to sustainable development: economic, social and environmental. Elaborating on these matters, the NPPF confirms that the planning system performs a number of roles:

- Economic – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;
- Social –to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering a well-designed and safe built environment, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and
- Environmental – to contribute to protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

5.11. Chapter 14, ‘Meeting the Challenge of Climate Change Flooding and Coastal Change’ specifically paragraph 153 states that plans should take a proactive approach in mitigating and adapting to climate change, taking into account the long-term implications for flood risk and coastal change. It should help to: shape places in ways that contribute to radical resolutions of greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.

5.12. In order to achieve the delivery of sustainable development, the NPPF sets out several underpinning aims, which provide the context for the assessment of development proposals. The different aims, insofar as they are relevant to the assessment of this application, are set out in turn below.

Building a Strong, Competitive Economy

5.13. Paragraph 81 confirms that the Government is committed to ensuring that the planning system does not act as an impediment towards sustainable economic development. Significant weight should therefore be placed upon the need to support economic growth through the planning system.

5.14. Paragraph 83 establishes that policies and decisions should recognise and address the specific locational requirements.

Supporting a Prosperous Rural Economy

5.15. Paragraph 80 confirms that planning policies and decisions should help create the conditions in which businesses in rural areas can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 85 goes on to state that planning policies and decisions should recognise that sites located beyond rural area boundaries should be designed sensitively to its surroundings. It also encourages the use of previously developed land, and sites that are physically well related to existing settlements, where suitable opportunities exist.

Achieving Well-Designed Places

5.16. The NPPG states that good quality design is an integral part of sustainable development; the NPPF recognises that design quality matters and that planning should drive up standards across all forms of development. At paragraph 126 it states that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.

- 5.17. Paragraph 126 of the NPPF states that effective engagement between applicants, communities, local planning authorities and other interests throughout the process is essential in achieving high quality design and places. Paragraph 127 goes on to state that Design policies should be developed with local communities, so they reflect local aspirations, and are grounded in an understanding and evaluation of each area's defining characteristics. It also identifies that neighbourhood plans can play an important role in identifying the special qualities of each area
- 5.18. In determining applications, paragraph 134 of the NPPF states that great weight should be given to development which reflects local design policies and government guidance, as well as outstanding or innovative designs which promote high levels of sustainability or help to raise the standard of design more generally in an area as long as they fit in with the overall form and layout of their surroundings.
- 5.19. Paragraph 135 of the NPPF sets out that local planning authorities should also seek to ensure that the quality of approved development is not materially diminished between permission and completion, as a result of changes being made to the permitted scheme.

Consultation

- 5.20. The NPPF outlines the importance of early engagement with the local community in association with the preparation of planning applications. In particular, at paragraph 41, it is noted that the more issues that can be resolved at pre-application stage, including the need to deliver improvements in infrastructure and affordable housing, the greater the benefits and for this to be effective and positive, statutory planning consultees will need to take the same early, pro-active approach, and provide advice in a timely manner throughout the development process.

Socio-Economic Benefits

5.21. A material consideration when determining this planning application is the socio-economic benefits arising from the redevelopment of the Site. The delivery of 152 and more jobs indirectly through supply chain and visitor spend will make a major and meaningful contribution to the local and Dorset wide economy. It will also be a strong sign of investor confidence in the Dorset brand, providing a major boost.

5.22. The delivery of careers, and not just jobs, through a bespoke and forward thinking staffing strategy will also help retain a cross section of the demography locally.

Economic

5.23. The change to the way in which the Site will operate by offering a range of accommodation types will allow the resort to remain open on a year round basis. Although it is inevitable that peak time will be the summer months owing to its coastal location, the introduction of facilities such as the spa, gym, indoor swimming pool and variety of dining options will increase visitors within the off-peak months, adding to the economic vitality of the area. Guests of Knoll House Hotel will generate increased expenditure within the local area, using local services and attractions such as pubs, restaurants, shops and attractions, which traditionally rely on a seasonal tourism trade.

5.24. The hotel has traditionally operated seasonally. This has meant that staff were predominantly employed on a contract basis and often sourced through agencies including a large number of international employees. The provision of onsite accommodation for the staff is a major benefit of that type of contract. However, it means that there is limited expenditure retention when compared with a member of staff who will be living in the local (or wider) area permanently.

5.25. Kingfisher Resorts also pride themselves on using local skills, services and produce where possible and the economic benefit of the proposal will therefore be twofold, during the initial construction phase of the development and, then, the ongoing operational phase. Strong community links and a local employment plan are integral to supporting the business and will include a number of key elements including:

- A Human Resources Director will build a framework and strategy to achieving a centre of employment excellence;
- Employment and training opportunities for local people from base level employees through to management positions, to include full and part time positions;
- Links with local schools such as Swanage Secondary School, Poole High School and Purbeck View School will be developed;
- Links with Bournemouth University's Hospitality Programmes and Bournemouth and Poole College Catering to provide workplace experience programmes and end of programme career opportunities;
- Employee Training and Development Programme to support and create staff advancement routes, linking with the other Kingfisher Resorts, such as Una. St Ives in Cornwall;
- Social enterprise activities to improve local employment opportunities and the health and wellbeing of the community. Kingfisher Resorts will help to build the skills, capacity and resilience with the community and opportunities for personal growth;
- Provide progressive employment plans with flexible work strategies to maximise adaptable employment options;
- A wide range of diversified employment opportunities including accounts and office staff, gardens, maintenance, housekeeping, chefs, wait staff, bar staff, spa, fitness and leisure staff.

- 5.26. Kingfisher Resorts will also promote and operate a sustainable travel plan to enable staff to access the development by modes of transport other than the private car. On-site parking will be limited to guest and visitors. Further details of the approach to accessibility are set out in the accompanying Travel Plan. The location and stability of employment opportunities will enable staff to live within the locality on a more permanent basis, providing greater job security and also greater re-investment into the local economy.
- 5.27. In providing a more stable mode of operation, Kingfisher are able to pay competitive salaries that will further enhance the local economic benefit derived through employment provision. The proposal will also deliver a sustainable business model in the medium and long term, responsive and appropriate to the tourism market.
- 5.28. The change from the existing mode of operation will not result in an increase in capacity of the existing hotel but will change the form of accommodation providing for a range of accommodation for a number of groups, including more appropriate provision for longer stays (1 to 2 weeks). This will also provide a range of beneficial transport impacts by reducing the number of short trips to and from the resort and promoting more sustainable forms of travel. This issue is considered further in the accompanying TS and TP.

Social

- 5.29. Paragraph 93 of the NPPF states that planning policies and decisions should plan positively for community facilities and other services to enhance the sustainability of communities and residential environments and ensure an integrated approach to considering the location of housing, economic uses and services. A key element of Kingfisher Resorts' business model is to encourage the use of the Site's facilities by local residents as this helps to ensure the resort remains open and operational year round. Therefore, the enhancement of the quality and availability of the onsite facilities would increase opportunities for local residents to undertake recreational activities, contributing to improved physical health, mental health and well-being. A high-quality environment also provides opportunities for social interaction, fostering social inclusion and community development. The redevelopment will also provide additional areas for local residents to socialise and meet.

- 5.30. Through the extensive consultation undertaken within the local community and collaborative working with both the Studland Parish Council and other key stakeholders, the Proposed Development has received general encouragement and support from the local community. Further details of the approach to public engagement and the outcomes of that engagement, in demonstrating how it has played a key role in influencing and shaping the scheme evolution, is set out in the accompanying Statement of Community Involvement.
- 5.31. It has been recognised from the outset, by the development team, that there is affection for Knoll House Hotel and its role in the locality. However, there is also recognition that the hotel is now of some age and in need of major investment if it is to survive as a tourism facility in the future. It will not do so unchanged. This proposal seeks to do just that, which has been recognised locally.
- 5.32. The proposal will provide a material benefit to the local community with facilities open to non-resident use, where currently a number of local residents may have to travel much further afield to access leisure and recreational facilities. The facilities will be available to non-residents on a membership basis.

Environmental

- 5.33. The Proposed Development would improve the environmental quality of an existing hotel site which, over recent years, has had a number of extensions and ad hoc buildings erected to accommodate additional guest rooms. In addition, a large amount of hardstanding exists both within the Site and extending beyond the Site boundary that is not utilised for guest amenity nor has any environmental value. The existing buildings are also incredibly inefficient.
- 5.34. As part of the redevelopment, an ecology-led landscaping strategy has been developed to increase both guest amenity and biodiversity onsite.

- 5.35. As set out previously, the change to how the Site will operate as a resort is considered to be of benefit to the surrounding environment by reducing the need to leave the Site by foot or vehicle. Sustainable transport options will be also be provided to guests. Whilst there will inevitably be a number of linked trips providing a benefit to local expenditure it is not considered this will have a direct impact on the heathland given the existing use and mode of operation of the hotel currently.
- 5.36. The layout of the Proposed Development incorporates a significant amount of connected open spaces for different uses, adding to the existing network of green infrastructure in the area. These include a strong landscaped buffers and wildlife corridors which will also provide visual screening to the perimeter of the Site, increased native planting to encourage biodiversity across the Site and the central open green space and ‘gardens’ which offer a range of landscape types and styles and informal recreational uses.
- 5.37. Sustainable Urban Drainage Systems are to be incorporated into the overall landscaping scheme to manage water from hard landscaped areas such as roads, paths and terraces. It will incorporate a range of different methods for managing runoff on site including soakaways; permeable pavements and surfaces across the site; large areas of open spaces and gardens to incorporate swale drains; use of absorbent soil layers on green roofs.

6. The Planning Balance

- 6.1. Paragraph 11 of the NPPF states that the planning permission should be granted where the development proposal accord with the development plan and the benefits of the proposal outweigh any adverse impacts when assessed against the NPPF as a whole. The proposed redevelopment of Knoll House Hotel is a unique opportunity to revitalise the Site and enhance the quality and variety of tourist accommodation available in the local area.
- 6.2. A comprehensive assessment of the impacts of the Proposed Development on the environment has been summarised in this Planning Statement and set out within the submitted Environmental Statement. There are no residual adverse technical, environmental or design impacts arising from this proposal that cannot be satisfactorily avoided or mitigated which would outweigh the wider socio-economic benefits of redeveloping the Site.
- 6.3. The extent of mitigation and long-term management measures highlighted within the accompanying Biodiversity Management Plan (prepared by Ecology Solutions) and the Sustainable Transport Plan (prepared by Exigo) would be secured through planning conditions. These address all of the previous concerns that were raised by consultees and provide commitments to mitigation and management measures where it has been requested.
- 6.4. As set out above, it has been demonstrated that the proposals are consistent with the aims and objectives of both the adopted Local Plan, the emerging Local Plan and the requirements of the NPPF, and that when combined with the material benefits associated with the Proposed Development these outweigh the close proximity to the adjacent ecological designations, particularly in the context of South East Purbeck, which has been identified as the focus for tourism in the district.

- 6.5. The Proposed Development supports many of the key aims of the NPPF, such as the redevelopment of an underused site, improved provision of community facilities, improvements to the local economy, good access to local services and facilities and the promotion of travel by foot, cycle and public transport.
- 6.6. The proposal represents a high-quality development consistent with the key objectives of sustainable development. It is considered that it has potential to represent an exemplar development for the local area and Dorset as a whole.
- 6.7. In assessing the planning balance there are number of significant material considerations which weigh in favour of the proposal, and it is consistent with the key objectives of the Development Plan. In the absence of any identified harm of material weight, the balance lies firmly in the favour of the grant of planning permission.

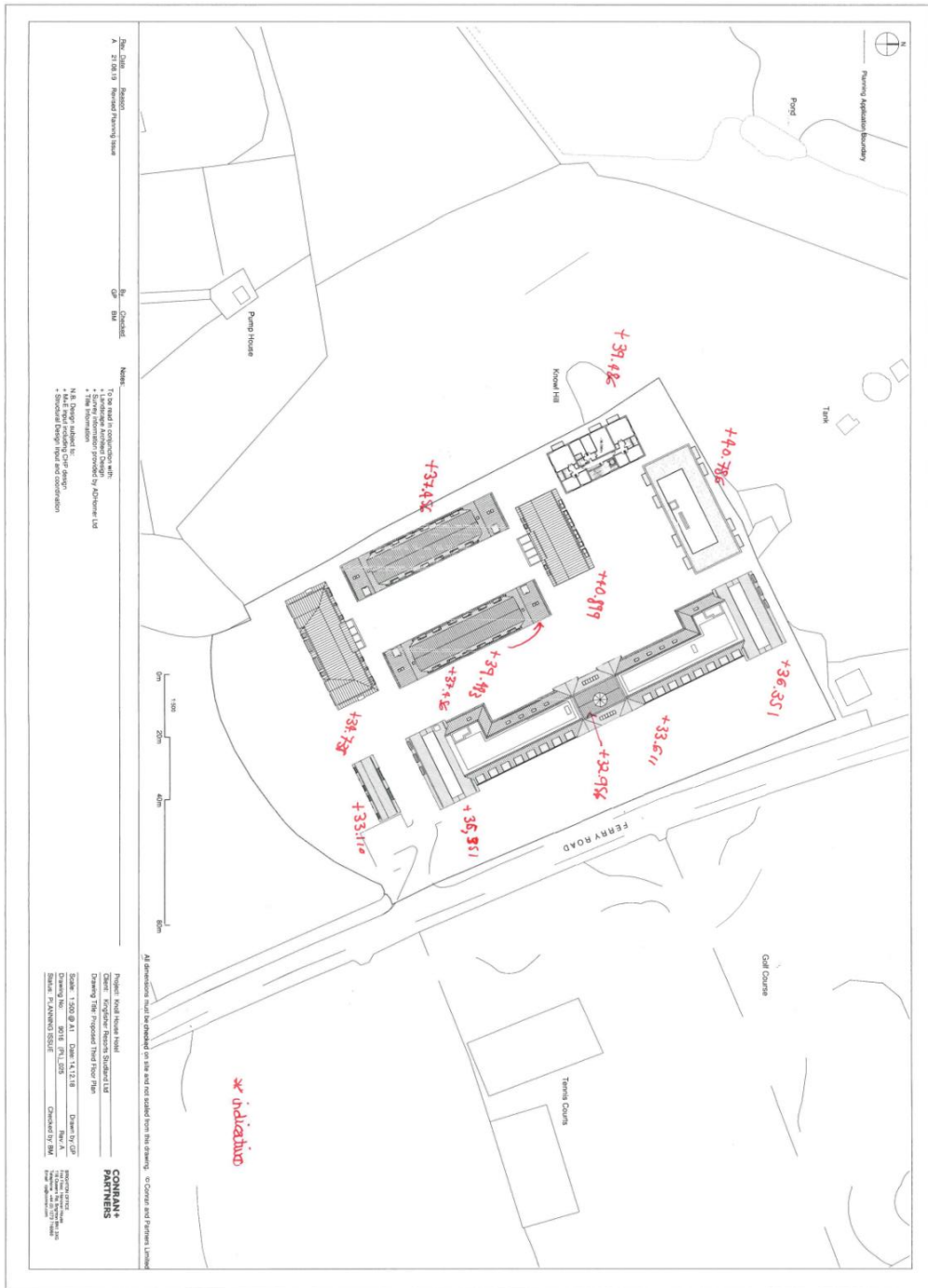
7. Conclusion

- 7.1 This Planning Statement and the documents that accompany the application confirm that the Proposed Development has been created following a thorough analysis of the application site and its context, both physical and socio-economic.
- 7.2 Following an extensive period of master-planning, the development proposal responds comprehensively to previously raised concerns and the range of constraints and opportunities presented at the Site. The application accords with the Council's adopted and emerging planning policies, as well as national policy and guidance.
- 7.3 The landscape-led approach site layout has evolved through a collaborative process which has included working with the National Trust and Natural England and other key consultees to obtain insight on the best amendments to the proposed scheme.
- 7.4 The accompanying technical reports reaffirm that the principle of development is acceptable in this location and that no further constraints have been identified which should prevent development from progressing. The Environmental Impact Assessment (EIA) process has demonstrated that no significant adverse impacts are predicted to arise subject to the appropriate mitigation and management strategies being secured either through the design process, planning conditions or S106 agreement.
- 7.5 The Site is considered to be brownfield land, previously developed as a hotel and has been a long-standing part of the community of Studland for over 90 years. The condition of the Site is now deteriorating and the redevelopment presents an opportunity to enhance the tourism offer within Studland by providing a year round resort.
- 7.6 The proposals would have significant sustainability benefits in terms of social, economic and environmental measures when assessed against the NPPF.

7.7 In conclusion, it has been demonstrated that the proposals accord with the Development Plan and meet the government's objectives for sustainable development.

7.8 In accordance with the procedure set out under Section 38(6) of the Planning and Compulsory Purchase Act 2004, the assessment set out in this Statement indicates that the proposal is consistent with the relevant provisions of the Development Plan, when read as a whole. In accordance with NPPF 11(c), permission should be granted without delay.

Appendix 1: Proposed Site Levels for Original Redevelopment Scheme



Figures:

Figure 1: Referenced AOD Levels



Figure 2: Referenced AOD Levels

