



**National
Trust**

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10th February 2023

Huw Williams
Development Management
Dorset Council

Dear Mr Williams,

Planning application ref. P/FUL/2022/06840 | Proposed redevelopment of existing hotel to provide new tourist accommodation including: 30 hotel bedrooms, apartment and villa accommodation and associated leisure and dining facilities | Knoll House Hotel, Ferry Road, Studland, Swanage, BH19 3AH

Thank you for consulting the National Trust on the above application.

The National Trust is a conservation charity that looks after nature, beauty and history for the nation – for everyone, for ever. The Trust owns the land surrounding the Knoll House Hotel site, including woodland, heathland, grassland and the visitor facilities and car parking at Knoll Beach; as well as large tracts of the Purbeck Heaths ‘super’ nature reserve. This whole area is valued for the natural beauty of its landscape – it is designated as an Area of Outstanding Natural Beauty (AONB) and is part of the Purbeck Heritage Coast.

(For information, the National Trust leases an area of its land around the Knoll House site to the hotel. Part of the Trust’s freehold land also lies *within* the planning application site; namely in the curved area at the southern end on the location plan).

Knoll House Hotel has a long history as a hotel, providing accommodation to visitors to Studland. The property started off as a country retreat built by the Bankes family of Kingston Lacy. Since becoming a hotel in 1931, the built development at Knoll has been substantially altered and added to over the years. The current condition of the buildings suggests that the built fabric is in need of renewal. However, the core structure of the hotel retains its traditional charm and would merit retention in a re-development scheme.

With the previous application (ref. 6/2018/0566), the Trust accepted the principle of re-developing the majority of the hotel site, but raised an objection to the development being proposed, in terms of its landscape and visual impacts, the ecological implications and highways and parking. Our initial feedback on the current proposal follows.

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Scale, design and appearance

Positives to note:

- The involvement of new architects and the apparent emphasis on a more 'landscape-led' approach. There is also a greater focus on sustainable design.
- The reduction in the number of proposed residential units, compared to the number proposed in the previous scheme.

Concerns / matters needing attention:

- We do still hold specific concerns about the overall scale of development – see matters raised under landscape, ecology and transport. In addition we have not found the proposed floorspace figures for the development in the application.
- Whilst the structure at Knoll has been substantially changed over the years the core still retains its charm. The 'Voysey-style' rough cast render, casements and simple columns enclosing the open porch are very much part of what Knoll is about, as is the principal room behind this elevation. Although elements may be being retained under this scheme, it is lost within a modern design. From our perspective, the meaningful retention of this identifiable core with its charm and character is important.
- The proposed use of zinc standing seam cladding is noted, as are the AONB's concerns that this is a relatively smooth and reflective material.

Landscape and visual impact

Positives to note:

- Compared to the previous application, the current proposals reduce the overall impression of large blocks of buildings across the whole site. The massing of buildings at the southern end of the site may also be lessened.
- The use of green roofs should help to ameliorate wider landscape impacts.
- The proposed covering / concealment of some car parking should lessen the perception and visual impact of parked vehicles on site.

Concerns / matters needing attention:

- Whether the proposed development is 'major development' in the AONB, and if the relevant tests would be met, is ultimately a matter for the decision-maker.
- Having studied the elevation drawings and colour 3D drawings, we continue to have concerns about the height of certain buildings, including the proposed four storey block. This might not be visible from right in front of the hotel, due to the intervening trees and three-storey apex roofs, but could be prominent from other perspectives. It would also be sited close to the northern boundary, meaning that it – and the scheme as a whole – is heavily reliant on the trees and woodland to the north of the site, continuing to offer screening for the lifetime of the development.
- The three storey curved building to the rear is also a cause for concern, due to its height, which means that it protrudes in views from the south.

- Green roofs – These would need careful specification and management to sustain their appearance during the year, especially in this coastal environment.
- Extent of glazing – The architects have sought to reduce the visual impact and potential lightspill from the windows, including with use of external timber slats, roof overhangs and tinted glazing. However the front elevation still retains substantial glazing. Inserting solid sections of panelling or masonry into elevations that look outwards could reduce this impact. Having an appropriate specification for the glazing to reduce lightspill is also important. As a general rule, mitigation should be inherent in the design, and not rely on sustaining certain management practices over time.
- Planting proposals – It is not easy to establish what tree planting is being proposed to mitigate the new accommodation within the red line. Elevation drawings show planting of new trees that are hard to track elsewhere in the application.
- Woodland Management Plan – This is the applicant's plan relating to the NT land leased to the hotel. It is as per the previous application, and needs updating to ensure consistency and succession in planting and management.

Ecology / biodiversity

Positives to note...

- As already noted, the number of proposed residential units has been reduced, compared to the previous scheme (from 63 to 48). The overall occupancy on-site is a significant factor in determining recreational impact on the heathlands.

Concerns / matters needing attention:

- Notwithstanding the above, there is a clear presumption against a net gain of C3 residential dwellings within 400 metres of the Dorset Heathlands. This is due to likely significant effects on the designated sites. Many other landowners and developers in Purbeck have had to adhere to these protective provisions when it comes to diversification and development projects close to the heathlands.
- Natural England and Dorset Council should carefully consider whether the proposed development would lead to an increase in recreational impacts on the heathland. Should the inclusion of some C3 units been deemed as policy complaint, there should be robust and inviolable mechanisms in place to ensure that the units remain as holiday units integral to the hotel complex, and would not become independent dwellings in future. The same applies to any essential controls such as a ban on cats.
- Surface water drainage is still shown as going north into Pipely Swamp and thence Little Sea, which are part of the designated sites (SSSI/SAC/SPA/Ramsar) to the north of Knoll House Hotel. Whilst this may reflect the current arrangement, the proposed development involves a significant increase in floorspace, heightening the risk of a change in nutrient levels in the designated sites. This is unacceptable from a National Trust perspective. An alternative solution to the south is required.
- Several measures proposed as mitigation are now proposed as enhancements in the "wider study area" (NT land leased by the hotel). As landlord, the Trust could agree to some of these measures, although beyond their initial implementation, it is not clear how they could be secured for the lifetime of the proposed development.

- Moreover, the Trust could not support the proposed dog-walking route, in particular the part that runs on the seaward side of Ferry Road. And as already noted, the Woodland Management Plan for the leased land needs updating.

Transport and parking

Concerns / matters needing attention:

- The proposals involve a major increase in built floorspace on-site, whilst the number of car parking spaces would reduce compared to the current situation. Practical experience suggests this would have implications on NT car parks and parking on public highways which would be outside control and influence of hotel.
- Whilst a staff shuttle bus continues to be proposed, and may help to avoid some staff car parking requirements, it is likely that some hotel staff would choose to drive to work, for example if they lived away from the bus route, or needed to drop off or pick up their children from school. We have continued concerns that overspill parking pressures in the local area are likely with the proposed development.
- Lastly, whilst the use of helicopters does not form part of this planning application, any guest travel to the property should be in keeping with the local area.

Conclusion

In conclusion, from a National Trust perspective, there are good reasons to pursue the re-development of the Knoll House Hotel site. Given the important landscape and ecological designations, it is crucial that any development proposals are of an appropriate scale, design and appearance, and that the landscape and visual impacts are effectively assessed, minimised and mitigated, and that ecological impacts on the Dorset Heathlands would not increase compared to the existing operation. Overall, the Trust still has significant concerns about key aspects of the proposed development. We would want to see these matters addressed before any re-development of the site could be undertaken.

Yours sincerely

Mark Funnell MRTPI
Planning Adviser – SW Region