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Research - Conserve - Campaign

5th April 2022

Ms Sarah Wilkinson
Isle of Wight Council
Seaclose Offices
Fairlee Road
Newport
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development@iow.gov.uk

Dear Ms Wilkinson,

Ref : 21/02437/FUL - Restoration & conversion of: Grade I Norris Castle to luxury hotel (C1); Grade I Norris Castle Farm, bailiffs house, cottage & walled kitchen arden to spa & wellness centre providing spa residences, treatment rooms, associated retail, restaurant & cafe facilities (sui generis); Grade II Pump House to clubhouse (E(f)); Grade II Cattle Shelters to a resort residence (sui generis), gatehouse & security building (E(g)(i)). Restoration of Grade I Registered Park & Garden including preservation of the grotto & ponds; 4 Grade II stone watering ponds. Construction of: spa residences within walled garden (suigeneris); two linked buildings to accommodate hotel services, amenities, swimming pool & additional hotel suites (sui generis); 4 seawall sentinel buildings containing resort residencies (sui generis); resort residences (sui generis), boathouse & slipway at harbourside; resort residences within Norris Castle Estate walls (sui generis); dwellings in South West Field (C3); parking areas, ancillary services, utilities, drainage works, SUDS & substations for resort. Repair and restoration of Seawall including Grade II elements to stabilise the Norris Castle Estate. Consolidation of Grade II Bathing House ruin & construction of associated restaurant (E(b)). Demolition of Modern Barn & change of use of existing barn for resort storage. Creation of resort access road from the Esplanade across Springhill Estate & demolition of section of Norris Castle Estate boundary wall to provide new entrance to resort. Hard & soft landscaping & all enabling & associated works. Outline Application: Construction on Springhill Estate of: senior living units with associated communal facilities (C2); dwellings (C3) including retention & conversion of existing buildings; associated drainage, services, utilities & SUDS; restoration of landscape; resort overflow car park & all enabling & associated works (all matters save for access reserved). Norris Castle With Springfield Estate, New Barn Road, East Cowes, Isle of Wight PO32 6AZ

Thank you for consulting The Gardens Trust (GT) in its role as Statutory Consultee with regard to proposed development affecting a site listed by Historic England (HE) on their Register of Parks and Gardens as per the above application. We have liaised with our colleagues in the Isle of Wight Gardens Trust and their local knowledge informs our response.

This major application contains a very large quantity of documentation and the relatively short consultation period gives us less time than we would like to assess fully the details of every part of the proposals. As our statutory responsibility lies with the impact upon the designed landscape the GT will primarily focus on this.

The Grade I registered park and garden (RPG) of Norris Castle lies within the Isle of Wight Area of Outstanding Natural Beauty (AONB) and is flanked to the west by The Springhill Estate (which lies outside the AONB) and to the south by the Grade II* RPG of Osborne Castle estate. This broad tranche of land, in particular Springhill and Norris Castle, represents a substantial area of virtually untouched landscape recognised for its picturesque views, especially to and from the Solent and Spithead, for at least the past

200 years. The significance of Norris Castle is heightened by its group value of castle, model farm and designed landscape, which together create an extremely fine example of Picturesque landscape style, crucially remarkably virtually unchanged since its creation c1799. Norris Castle's Grade I RPG ornamental pleasure grounds and park were most likely laid out by Humphry Repton, as a landscaped setting for a marine villa built in the form of a Gothic castle designed by James Wyatt, and a castellated model farm following the traditions of a ferme ornée. The GT has corresponded with Stephen Daniels, the Repton expert, about recent research undertaken by John Phibbs

<https://www.iowgardenstrust.co.uk/V2%20Repton%20on%20the%20IoW%20final%20for%20website.pdf>

and Mr Daniels endorses Mr Phibbs' conclusion that although no drawings by Humphry Repton relating to Norris Castle have come to light, Phibbs concludes he did work there: *'Besides the illustration in Peacock's Polite Repository, so much of what happened at Norris was recommended by Repton at Plas Newydd (1799) and Hooton (1802), where he was working at more or less the same time. It is as if he was trying to see how the same suite of ideas would play out with different buildings in quite different parts of the country'* (Phibbs 2017e)¹

Springhill shares the elevated views of Norris Castle and the former parkland surrounding the current house is now pasture with some remaining veteran trees. It is locally listed and its significance is enhanced due to its position and proximity to Norris Castle.

The cost of restoration of the landscape and numerous listed structures at Norris Castle will exceed the value of the property once restored, which is why the applicant has put forward an ambitious scheme for a large quantity of new buildings within the application site. Whilst the GT welcomes the restoration proposals, which include work on the listed buildings, walled garden, parkland, opening of vistas as well as woodland/understorey management etc, we have very serious concerns about the scale of development proposed to achieve this. For the reasons outlined below we feel that the proposals represent an overdevelopment of this extremely precious site which will irrevocably alter the character and spirit of place of both Norris Castle and Springhill.

The application documents state that the Sentinel buildings form part of the structural support system to the sea wall. The restoration of the sea wall, one of the most expensive parts of the restoration proposals, is in direct conflict with the IOWC's Shoreline Management Plan. If the seawall is not restored, then the Sentinels and the restaurant complex at the Bathing House will be unviable. The sea walls are eroding not due to land-slippage as suggested in the application documents, but instead we would argue, by the power of the sea. The monolithic Sentinel buildings would permanently alter what is widely considered the most famous and historic view towards the castle from the north, and we strongly oppose the construction of these and the other developments along the seashore.

Appendix A, Schedule of Accommodation Development Proposals (Structural Report) by Gurney Consulting Engineers, included within the online documentation, makes it clear that (p27) *'there is little evidence of foundation movement causing damage to the load bearing external walls'* (of the Castle). In order to clarify the crucial status of land stability Historic England (HE) commissioned their own report : *Environmental Statement Volume 3*, pp 57-62, Annex B, Historic England, Structural Engineering Team, Internal Report, 13th January 2021. HE's report recommends : *'The applicant's geotechnical engineer should consider the beneficial effect of the Bembridge Limestone formation on the stability of the castle, this appears to have been overlooked in the original report (Structural Report). Additional boreholes should be considered at the location which the applicant believes is vulnerable to slip as this would provide greater certainty as to the geology and the risk of the slope to instability.'* However, this is contradicted by another letter to the applicant from Wilson Bailey, Geotechnical and Environmental, dated 25th January 2020 (*Environmental Statement Volume 3*, Annex C, pp 63-65) in response to HE's structural report. This contradiction appears to be centred around the nature of what Bembridge limestone is, apparently the platform upon which the Castle sits, and which gives it considerable stability. Whilst unravelling these contradictions is beyond our technical expertise, the suggestions for further boreholes would appear sensible to clarify exactly how stable the site of the Castle is. If the Castle is stable, as per HE's conclusion *'I do not believe that this instability extends as far as the castle due to the presence of the Bembridge Limestone Formation, which has not been considered by the applicant's*

¹ Phibbs 2017e, 'Boundaries?' Posted August 21, 2017. Available from: <http://www.thebrownadvisor.com.gridhosted.co.uk/2017/08/21/1829-boundaries/>

geotechnical engineer, it follows that the applicant's statement D&A (Section 4, p 69) '*Apart from providing much needed accommodation, the Terrace rooms in particular allow structural stability for the Castle and the slope below the Castle*' is misleading. We would also therefore query the assertion (D&A, Sect 5, p88) that '*The Terrace (ie. subterranean Suites) also has a structural function in resisting landslide in front of the castle which would ultimately endanger it.*' What the reports do agree on is that vegetation on the hillside is extremely beneficial for slope retention. The GT also considers that the Terrace and Crescent developments are harmful to the setting of the castle and the RPG, regardless of any stability concerns.

For an application of such complexity and sensitivity, we would have expected to have seen examples of wire frame photo-montages taken from several crucial viewpoints, especially within the Norris Castle Estate. Without these, it is difficult to envision exactly how visible the numerous newly built structures will be within the landscape. Of paramount importance would be a wire frame photo-montage taken from the sea, as this has historically always been the set-piece view of the Castle and its surrounding parkland. With vegetation clearance (which we are told could jeopardise the stability of the slope) opening up historic views and also necessary for the construction of the Terrace, Castle Crescent, Restaurant by the Bathing House, Coastal Cottages, and their associated access roads, the newly built elements will become considerably more prominent within the landscape, negatively impacting its setting and significance. The many new roads throughout both estates plus the extensive new housing within Springhill will add to this negative, permanent impact upon the application site. Other introduced buildings which will be visible upon the approach to Norris Castle along the main drive : housing in the South West Field, the modern barn residences, car parking, and housing within the Walled Garden (which will be visible over the walls), will irrevocably adversely impact upon the way the various heritage assets are experienced within their setting.

Your officers will be familiar with Historic England's *The Setting of Heritage Assets, Historic Environment Good Practice Advice in Planning Note 3* (Second Edition), pub 2nd Dec 2017, Part I – Settings and Views (SHA). This advice states (p2) that '*buildings that are in close proximity but are not visible from each other may have a historic or aesthetic connection that amplifies the experience of the significance of each*'. Also pertinent in this unaltered Grade I RPG : (p2) '*A thorough assessment of the impact on setting needs to take into account, and be proportionate to, the significance of the heritage asset under consideration and the degree to which proposed changes enhance or detract from that significance and the ability to appreciate it*' and lastly (p2) '*When assessing any application for development which may affect the setting of a heritage asset, local planning authorities may need to consider the implications of cumulative change.*' All are relevant at Norris Castle.

When the estate at Springhill is included in the application SHA (p5) states that '*While many day-to-day cases will be concerned with development in the vicinity of an asset, development further afield may also affect significance, particularly where it is large-scale, prominent or intrusive. The setting of a historic park or garden, for instance, may include land beyond its boundary which adds to its significance but which need not be confined to land visible from the site, nor necessarily the same as the site's visual boundary.*'

Taking into account all the above excerpts from SHA it is clear that the proposed development in both Norris Castle and Springhill estates will be extremely harmful to the setting of the designated and non-designated heritage assets. This is amplified on p11, which deals with the Experience of the Asset, which will be hugely altered by the proposals set out in the application : *Views from, towards, through, across and including the asset; Noise, vibration and other nuisances; Tranquility, remoteness, 'wildness'; Busyness, bustle, movement and activity; Sense of enclosure, seclusion, intimacy or privacy.* During the long construction period the current tranquility will be lost and subsequently, the additional qualities of remoteness, seclusion and privacy will also vanish forever.

We also have great concerns about the lighting which will be introduced into the hitherto dark landscape at night. Even if the structures comply with Dark Sky lighting requirements, the numerous new residential dwellings and 'resort' buildings, most subdivided into units/suites, cannot help but drastically increase night-time light emittance. The housing proposed in the outline Springhill proposals as well as lights from residents' cars will add to this light pollution and should the scheme for whatever reason prove financially unviable, the inevitable request for additional development elsewhere within the application site, will add to the loss of darkness over this large area.

We also have concerns with regard to public access. The Norris Castle developments are in essence a private gated community which will be inaccessible to the general public. Within Springhill a few hectares

have been allocated as publicly accessible, but this a very small proportion of the entire application site. We therefore feel that the scheme provides insufficient public benefit.

The applicant is at pains to stress that the extensive new build is not enabling development. We struggle to accept this argument. The NPPF, para 208 states : '*Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.*' It would be extremely unlikely that the land at Springhill would ever be given planning consent if it were not as enabling development for the proposals at Norris Castle.

In our opinion, the proposals fail to comply with the NPPF para 189 as the development within Norris Castle estate will so change the character of the RPG that future generations will no longer be able to appreciate its contribution to the quality of life as originally designed. We consider that the development fails 190c & 190d of the NPPF as it does not make a positive contribution to local character and distinctiveness and changes that environment and the character of place forever. Paras 199 and 200 are also applicable in this case.

Cumulative harm is of particular influence within this application. The weight given to the harm is particularly high given the significance of the historic assets affected as an ensemble. It is the degree of harm to the asset's significance as a whole rather than the scale of the individual areas of development that we feel should be considered. The sum total of all these individual works add up to cause substantial harm to the assets and their setting.

In conclusion, the proposed development will be transformative, with the numerous new buildings damaging the setting and significance of a large and varied group of highly important designated and undesignated heritage assets, particularly their landscape frame. The Gardens Trust objects very strongly to this application and whilst the restoration aims of the applicant are laudable, the quantity of new building required to finance this represents an overdevelopment of the unaltered historic application site as a whole, and as such is not the Optimum Viable Use for the application site. A solution for the problems at Norris Castle is something we all desire, but unfortunately, in our opinion, the current proposals are not the answer.

Yours sincerely,

Margie Hoffnung
Conservation Officer