



Historic England

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Our ref: L01461414

7 April 2022

Dear Miss Wilkinson

**Arrangements for Handling Heritage Applications Direction 2021
& T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**NORRIS CASTLE WITH SPRINGFIELD ESTATE, NEW BARN ROAD, EAST
COWES, ISLE OF WIGHT PO32 6AZ
Application Nos 21/02438/LBC & 21/02437/FUL**

Thank you for your letters of 22 February 2022 regarding the above applications for listed building consent and planning permission. This letter represents our initial response to the proposals which will be augmented by further advice, setting out our formal position, once the additional information requested has been provided and we have consulted the Historic England Advisory Committee.

Summary

Norris Castle is of outstanding importance as a particularly beautiful and unusually well-preserved picturesque ensemble of house, landscape and ancillary buildings. The current proposals would entail a very high degree of harm to its significance. Historic England anticipates objecting to these applications, but further information, particularly an independent assessment of the viability of the proposed scheme, is needed before we can issue our definitive advice.

Historic England Advice

The Norris Castle estate captures perfectly the ideals of the Picturesque movement, one of England's great contributions to western culture. Castle and farm, both of which date to c.1800, are important works by James Wyatt, one of the leading architects of the day. They are romantic evocations of an idealised past in a spectacular marine setting. Parkland and buildings combine to create a beautiful place that is all the more special for having changed little since it was built.



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Norris is one of the great treasures of the Isle of Wight and ought to be far better known nationally. Its importance is reflected in the listing of Castle and farm at Grade I and the inclusion of the park on the Register of Parks and Gardens at Grade I. It is also in poor condition and in need of extensive repairs.

The current application is to turn the estate into a resort. This would involve major change to the Castle and farm along with extensive development around these buildings and within the Registered Park. As this resort is not thought to be viable alone it is to be cross subsidised by market housing both within the registered area and on the neighbouring Springhill estate (a locally listed heritage asset).

Development on the scale envisaged would have a profoundly harmful impact on the Norris Estate. Its unaltered, tranquil character would be completely lost, and parts of the landscape and buildings would be altered to such a degree that they would become unrecognisable. We are particularly concerned about the impact of: building in the west field; constructing a terrace in front of the Castle; the method of conversion of the castle interior; building in the walled garden; the loss of agricultural character entailed by the conversion of farm buildings; the impact of the sentinel houses and coastal cottages on views of the estate from the sea; and impact of housing in the south-west field on views of the approach to the estate.

We consider that the proposals would cause substantial harm to the Registered Park. Harm of a very high order is likely to also be caused to the Castle and farm. At present we cannot come to definitive conclusions about the level of harm to both these Grade I listed buildings as important information on the precise nature of the proposals is missing from the application.

Nevertheless, it is already clear that if granted these proposals would be a very poor outcome for such an important place; the qualities that make it so special would be deeply compromised or lost completely. This cannot be meaningfully remedied by improvements in design; a different approach, based on minimising new development, is needed if this level of harm is to be avoided.

Furthermore, the proposals are a very inefficient means of raising the money necessary to repair the buildings. The costs of converting the Castle, forming the resort and building the market housing are vast: around £135 million (this excludes repair and restoration costs, but including a developer's profit of around £22 million). This is out of all proportion to the estimated repair costs of £16.55 million.

We also have doubts about the viability of a luxury resort in this location. A scheme that is unlikely to be viable does not represent a workable solution for the problems faced by the estate. We also need to be sure that any harmful development proposed is the minimum needed to secure the estate's future. Therefore, the financial information submitted by the applicant needs to be independently audited by a





specialist.

As the implications of the proposals are incompletely understood the requirement of the National Planning Policy Framework (paragraph 200) for clear and convincing justification for any harm to a designated heritage asset has not been met.

Historic England recommends that determination of the application is deferred until further information is supplied.

On the basis of the evidence available so far, we anticipate that we will object to the current scheme. However, decisions about the future of the estate need to be evidence led and the additional information we request would create a more solid basis for making a final decision.

Further information required

To allow a fully informed judgement to be made on the impact, justification and deliverability of the proposals, the following further information is required:

- The viability report submitted needs to be assessed by an independent specialist appointed by your council.
- The repair costs and other development costs need to be shared (Appendix G of the Urba report)
- A clear justification of the necessity for major works to stabilise the slope to the north of the Castle is needed. We are unconvinced that an intervention on this scale is necessary and as far as we are aware to date the ground conditions in the immediate vicinity of the Castle have not been thoroughly investigated. Details of the ground models used in the slope stability analyses (including the stratification, the presence and location of pre-existing slip surfaces, peak and residual soil shear strength parameters and the groundwater regime) and associated factors of safety all need to be provided.
- The application does not contain drawings as existing, and consequently it is difficult to understand how the buildings are to be altered. These should be supplied.
- The problems caused by the lack of as existing drawings are particularly acute in the walled garden. As early aerial photographs make clear, the ground level falls across the garden and the south-east wall is also considerably lower than the south-west and north-west walls. The drawings showing the proposed apartment 9RE1654-Z1-P-A505 and RE1654-Z1-P-L518) assume that the ground is level and that the south-east wall is the same height as the others. It



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is therefore unclear whether the new residential units would be invisible from the exterior of the walled garden as the drawings suggest.

- Details are also needed of the buttressing proposed in the walled garden. One of the justifications given for the apartments is that they would help stabilise the kitchen garden walls. However, as they would not cover the entire length of the walls they can only be used to stabilise parts of them. Drawing RE1654-Z1-P-L518 suggests that there would be new buttresses. The position of these needs to be clarified.
- Details are needed of which of the rooms within the castle are to be treated with the 'typical finish protection detail' shown in drawing RE1654-Z1-A507.
- At present it is not possible to fully understand the impact of new development on the landscape and key views of the Castle and farm. No accurate visual representations have been provided, nor have contextual elevations. Views showing all the proposed new development from the sea are needed to enable the cumulative impact of this to be properly assessed. Wire frames rather than fully rendered views would be sufficient, but these would need to take into account the effect of the clearance of trees proposed. Views are also needed of the approach to the estate from the South Lodge, so the impact of the housing on the south-west field can be understood and of the proposed Modern Barn Residences from both the existing (south-east) and disused (south-west) drives. Again, wireframes would be sufficient. We would be happy to work with the applicant to agree viewpoints.
- Details of how the service drives would be paved and lit are required. At present all that is known is that "these will rarely be more than 2.7m wide, usually with a granular permeable surface" (Design and Access Statement 9.3).

Recommendation

Historic England recommends that determination of this application is deferred until further information has been provided, to allow the impact of the proposals to be fully understood, and the viability report has been independently audited.

If your council were minded to determine the application without this further information we would object on the basis that the clear and convincing justification for the harm, substantial in respect of the Registered Park and of a high degree in respect to the Listed Castle and farm, required by paragraph 200 of the NPPF had not been supplied.

Your authority should take these representations into account and seek further information as set out in our advice. If, notwithstanding our advice, you propose to



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determine the applications in their current form, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

If your authority is minded to grant consent for the LBC application in its current form, please treat this letter as an objection and notify the Secretary of State of the LBC application, in accordance with the above Direction.

Please contact me if we can be of further assistance.

Yours sincerely

Richard Peats

Team Leader

E-mail: richard.peats@HistoricEngland.org.uk

cc: Lee Byrne, Conservation Officer, Isle of Wight Council



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