



Town and Country Planning Act 1990 - Section 77
Town and Country Planning (Inquiries Procedure) (England) Rules
2000

Summary of Proof of Evidence – Planning

Site:	Anglia Square including land and buildings to the north and west
Applicant:	Weston Homes PLC and Columbia Threadneedle Investments
Local Planning Authority:	Norwich City Council
Name of witness:	David Parkin (MRTPI)
PINS reference:	APP/G2625/V/19/3225505
LPA reference:	18/00330/F
Reference:	NCC1/2

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1. I am David Parkin, Area Development Manager for Norwich City Council. I manage the inner area team and oversee all major applications within Norwich city centre. I have been employed in this role since 2016.
2. With reference to the headings in the Secretary of State's call in letter, set out in the following paragraphs is my summary assessment of the proposed development, benefits and harm, along with my judgment of the weight to be attributed to each in the planning balance. I have used the following descriptors of weight, starting highest to lowest: great – significant – moderate – minor.

(a) The extent to which the proposed development is consistent with the Government's policies for delivering a sufficient supply of homes (NPPF Chapter 5)

3. It is a core objective of the NPPF to significantly boost the supply of houses. Although currently the Council can show that land supply stands at 6.82 years for the area of Norwich City, there is evidence that the number of completions remain below target for the whole plan period. If land supply were measured against the JCS targets, the land supply would now be 3.94 years for the Norwich Policy Area (NPA). The NPA remains a relevant area within which to consider housing land supply as it closely approximates to the Core Market Area identified in the Central Norfolk Strategic Housing Market Assessment 2017 (CD2.21 page 6, para. 1.6). Overall, I am of the view the need for housing for the area in which the site is situated is great.
4. With the scope to deliver 2.06 years of Norwich's local housing need the development would significantly boost the supply of homes in the city. Furthermore on the basis of evidence in the SHMA 2017 the development in terms of size, type and tenure would make a significant contribution to meeting identified local housing need.
5. In paragraphs 117 and 118 of the NPPF it is stated that planning decisions should promote the effective use of land in meeting the needs for homes and other uses and that planning decisions should give substantial weight to the value of using brownfield land.

6. Anglia Square is Norwich's highest profile city centre brownfield site which has sat vacant and under-utilised through two economic cycles. The degraded appearance of Sovereign House, the disused Multi Storey Car Park and the site in general is detrimental to the local historic townscape and the image of Norwich as an attractive location for investment. Ensuring a development comes forward without any further delay is a significant consideration for the Council. The Council is satisfied that with the level of public subsidy available the proposed housing-led scheme is viable and capable of unlocking this site for beneficial development.
7. In summary the proposed housing led scheme will: boost the supply of homes in Norwich, provide homes which meet locally identified housing need; make effective use of a brownfield site and enable major residential development to be focused in a highly sustainable location. It is my judgement that these benefits positively support the housing objectives of the development plan and the NPPF and are capable of being assigned great weight in the planning balance.

(b) The extent to which the proposed development is consistent with the Government's policies for building a strong, competitive economy (NPPF Chapter 6);

8. Over the last two decades there has been a marked reduction in the number of jobs on this site and the vitality of the Anglia Square centre has declined.
9. The £270million investment will enhance the retail and leisure function and overall vitality of the centre, the viability of the Large District Centre as a whole and boost confidence in the northern city centre as a location for wider re- development.
10. Jobs created over the 8 year construction period will lead to an 8% increase in jobs in this sector, delivering a city wide benefit. The jobs density on the site will be permanently uplifted by the creation of additional job opportunities delivering both local and city wide benefit.
11. The development will positively support the economic regeneration of the site and the Northern City Centre and assist in reducing levels of deprivation in this part of the city.

12. It is my judgement that these benefits positively support the economic objectives of the development plan and the NPPF and are capable of being assigned great weight in the planning balance.

(c) The extent to which the proposed development is consistent with the Government's policies for ensuring the vitality of town centres (NPPF Chapter 7);

13. The existing shopping centre is outdated and has limited capacity to serve a large district centre function.

14. The proposed replacement of the existing commercial floorspace with a mix of premises suitable for shopping, leisure, hotel and offices uses will along with the proposed new residential neighbourhood, support the long term viability and vitality of the centre and the wider Anglia Square/Magdalen Street district centre. Furthermore, it will strengthen the economic base of the northern city centre and enable this part of Norwich to contribute to the city's regional role as a focus for retail, leisure and employment.

15. It is my judgement that these benefits positively support the vitality of town centres and the objectives of the development plan and the NPPF and are capable of being assigned significant weight in the planning balance.

(d) The extent to which the proposed development is consistent with the Government's policies for conserving and enhancing the historic environment (NPPF Chapter 16);

16. The Council has identified that the development will impact on the significance of designated heritage assets and result in harm. In considering the impact of the development on individual designated assets the Council has judged that the impact varies in magnitude; in some cases relates to assets which are of the highest national importance; and in all cases is less than substantial.

17. The Council has had regard to the heritage benefits of the scheme which will serve to enhance the Anglia Square character area. Nevertheless the Council and Mr Webster's evidence accepts that, given the designated heritage assets involved, great weight should be given to the assets' conservation and that the level of harm is such that under 194 of the NPPF it requires very clear and convincing justification.
18. In considering whether the level of identified harm has been clearly justified, the Council has had regard to a number of considerations. These include: the circumstances of Anglia Square which have resulted in the site's deterioration and current condition; the not unreasonable position that development should now come forward without any further delay; and whether there are reasonable prospects of an alternative form of development on the Application site being delivered, which avoids or results in less harm. Having considered these factors the Council considers the harm to be justified, and I agree with this position. However, in accordance the NPPF it is my judgement that in the planning balance, great weight should be attached to avoiding the level of harm which has been identified to the significance of designated heritage assets.

(e) The extent to which the proposed development is consistent with the development plan for the area including any emerging plan;

19. The redevelopment of Anglia Square is a long held and unmet strategic objective of the Council and JCS 11 firmly establishes the regeneration of the Northern City Centre, including Anglia square, as a strategic planning policy objective.
20. The ability of the development to unlock a long term underutilised and derelict site for comprehensive mixed use development without any further delay is, in my view, capable of being given great weight in the planning balance.

21. In terms of meeting development plan policies that relate to sustainability matters (JCS 1, JCS 3, DM1, DM3, DM6, DM7, DM8 and DM28), the application site is one of the most sustainable sites in the city for development. I consider that in the planning balance significant weight should be attached to the sustainability benefits of focusing mixed use development in this location (reducing the need for travel etc.) ; minor weight to the landscape strategy, which includes tree planting, podium gardens and extensive green roof provision; minor harm to the impact of the development on air quality (moderated by the proposed mitigation and the fact that any physical re-development of this site would result in deterioration to some degree); and minor harm to the level of use of non-renewable resources given the level of demolition, nature of construction and the failure to embrace more ambitious district-wide energy sources for energy generation.
22. Furthermore, re-planning the site provides the opportunity to create multi-purpose streets and public spaces. The proposed public realm and communal gardens are designed to function as accessible, community spaces, for sitting, socialising and play. The scheme includes new homes, including affordable homes (10% of homes to be adaptable and accessible) a replacement chapel, new shops and leisure facilities. These measures in combination are beneficial to health and wellbeing and inclusivity and in my judgement capable of being attributed significant weight in the planning balance given the scope to support the policy objectives of development plan (JCS 7, DM1, DM2 and DM3) and chapter 8 of the NPPF
23. It is not disputed that the proposed form and density of the scheme will contrast with traditional and contemporary patterns of development in Norwich. The Council has identified some weaknesses in the proposed design approach in particular the extent to which the development is 'sympathetic to local character and history, including the surrounding built environment' and the level of overshadowing. However, these weaknesses in the design approach have to be weighed against design strengths that have been identified through the Building for Life assessment.

24. Overall the development will make effective use of a site much of which is a wasteland and despoiled by a largely vacant and outdated precinct. The proposed development will replace these negative features with a new neighbourhood with its own distinct character that is bold, modern and unashamedly urban. The tower and its architectural treatment gives further distinction and is capable of symbolising the regeneration of this part of the city. On this basis I view the design approach as broadly consistent with the DM3 although I accept there are areas where tension exists.
25. Policies JCS 2 and DM9 both deal with the preservation of heritage assets. Heritage benefits are identified but these are outweighed by the harm to heritage assets. DM9 allows for the loss of assets and harm to their significance but makes clear that this should be in 'exceptional circumstances'. It is my opinion that the overall public benefits of the scheme amount to 'exceptional circumstances'.
26. Overall I consider the proposed development for the site is broadly consistent with the development plan and that where conflict arises there are material considerations of sufficient weight to justify granting planning permission.

CONCLUSIONS

27. Paragraph 196 of the NPPF states that where a development will lead to less than substantial harm to the significance of a designated heritage asset/s, this harm should be weighed against the public benefits of the proposal. objectives.
28. The scheme, if built, would have a significant and permanent regenerative effect on the northern city centre and deliver comprehensive development on one of Norwich's most conspicuous degraded brownfield sites. Substantial public benefit will follow these broad economic, social and environmental objectives being met.

29. The Council recognises that Norwich has a remarkable historic centre and that in considering the impact of the proposed development great importance and weight should be given to the conservation of the city's historic environment. However, there are multiple public benefits associated with the proposal which individually and collectively need to be weighed against the identified harm. Cumulatively these benefits are sufficient to outweigh the harm to the historic environment notwithstanding the great weight ascribed to its conservation. It is therefore my opinion that the Council was correct in deciding to support this scheme.