

**FOR THE APPLICANT:
WESTON HOMES**

**EXPERT EVIDENCE TO THE PUBLIC
INQUIRY UNDER SECTION 77 OF
THE TOWN AND COUNTRY
PLANNING ACT 1990**

ANGLIA SQUARE, NORWICH

**SUMMARY: HERITAGE,
TOWNSCAPE AND VISUAL IMPACT**

WH 2/2

**LPA REF. 18/00330/F
PINS REF. APP/G2625/V/19/3225505**

**Dr Chris Miele MRTPI IHBC
Senior Partner
Montagu Evans LLP**

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1.0 SUMMARY

- 1.1 My main Proof of Evidence (“**PoE**”) (**WH 2/1**) sets out my qualifications, experience and background, and explains how I came to be involved with this project and what I have been asked to do.
- 1.2 I was instructed to undertake an independent review of the proposals to see whether I could support the Applicant as an expert witness treating heritage, townscape and related design matters. My evidence, thus, treats two separate areas which are, however, closely related.
- 1.3 Accordingly, and in line with my professional duties as an expert (see Signed Affirmation concluding my PoE), I had a two-stage instruction. I agreed to accept the further work on the basis, made clear to the Applicant, that I identified a number of harmful impacts, all less than substantial, on designated heritage assets. I also identified a number of heritage and townscape benefits.
- 1.4 There are many heritage assets under consideration at this Inquiry, and I have grouped these in the following way and in this order:
- 1.4.1 The first group comprises the local area at Anglia Square including its heritage assets and townscape. This analysis will cover Anglia Square itself and Madgalen Street, the northern approach into the city comprising Aylsham Road, St Augustines Street and Pitt Street and related heritage assets, in particular the Grade I listed St Augustine’s Church and its almshouses (Grade II).
 - 1.4.2 The second grouping concerns the mid-distant effects. Within this group I consider the northern part of the city which was located within the former city walls – Colegate, Elm Hill, Fye Bridge and Tombland – and the civic core. The civic core is broadly the area from the City Hall and The Forum, across the market and east towards the Castle.
 - 1.4.3 The third and final grouping is the effect of the proposals on the distant, panoramic views of the city and the appreciation of the heritage assets therein. These views are those provided by the higher ground to the east of the city (Mousehold and Ketts Heights), the Castle ramparts, across the Anglican Cathedral meadow and Waterloo Park in the city’s hinterland.
- 1.5 **Section 4.0** of my main PoE sets out my understanding of the national policy that flows from the statutory duties as these relate to conservation areas and listed buildings. I do not think there will be much between the parties on this material.

- 1.6 I also consider the development plan basis for the decision and other material considerations as they relate to my area of evidence. I defer to the evidence of Mr Luder (**WH 4/1**), providing planning evidence for the Applicant, as to the weight of the guidance note pertaining to the Application Site (the Anglia Square Policy Guidance Note, March 2017, **CD2.11**) and other planning policy matters.
- 1.7 My understanding is, simply, that the LPA accepts that comprehensive redevelopment of the site is highly desirable. It self-evidently is. It follows that such a redevelopment must, to be deliverable, involve more accommodation.
- 1.8 Likewise it is accepted that this redevelopment should have a landmark quality. This does not, as a matter of policy or urban design approach, require a tall building since a landmark can take many forms. However, a tall building is being promoted and in my judgment can perform an important role on this site, transforming perceptions of the area and marking the northern quarter of the city and providing legibility at different scales. I agree with Norwich City Council ("**NCC**") that there is no issue with the principle of a tall building on this site and that what matters are its effects.
- 1.9 I consider the effects of the scheme as a whole on two bases.
- 1.10 First I look at its design, both the arrangement of the blocks, uses and the detailed design of the tower and Block A (presented in full). Achieving a high standard of architectural and urban design quality is a freestanding test. Assessing design quality in its context is also a necessary part of judging the impact of proposals on the historic environment (the principle is well established in Secretary of State ("**SoS**") decisions on tower schemes, including the recent one on the Chiswick Curve (see **Appendix 15.0** of my PoE in **WH 2/3**).
- 1.11 The design characteristics of a proposal go to mitigating and reducing an impact, and the quality of design (and of the tower especially given its extended area of impact) is also material as to whether the effect is acceptable or even material.
- 1.12 The proposals radically transform one part of the large City Centre Conservation Area ("**CCCA**"). This is a direct impact and I conclude that overall there will be a considerable enhancement to the way the area appears and functions.
- 1.13 The proposals also have to be judged in a wider heritage context.
- 1.14 I will note here that I consider the impacts on the historic environment of Norwich to have been overstated in the Historic England ("**HE**") representations, including their consultation responses on the application (**CD8.1 and CD11.24**) and their Statement of Case ("**SoC**") (**CD11.3**). On my analysis, the impact on the historic city south of the River Wensum (the focus of Norwich's historic environment) is very limited as a matter of fact, and as to the actual area of impact.

- 1.15 I also consider that the setting effects in the area of the city south of the River Wensum are, in the main, neutral. By this I mean that there is some intervisibility from different sensitive areas, but that setting effect is not harmful when one considers the character of the affected views, distance, the duration of the impact and the physical characteristics of the thing which is seen. Seeing something does not in itself equate to harm even where that intervisibility involves changes to the setting of highly graded assets.
- 1.16 To assist the Inquiry and SoS I have advised the Applicant to instruction further visualisation work to quantify the duration and nature of the impacts. This is presented in my **Appendices 8.0, 9.0 and 10.0 (WH 2/3)** and is based on Zone of Visual Influence (“ZVI”) using digital 3D mapping (ZMap). From this I have extracted three moving sequences.
- 1.17 I do identify a harmful impact from part of the historic core south of the river, along Wensum Street between Tombland and Fye Bridge. This is accompanied by urban design benefits (legibility) which have the effect of integrating the new development with the older core. The harm to heritage assets is a ‘weighted’ harm having regard to the statutes and policy; the urban design benefit does not attract weight in the same way but is clearly material.
- 1.18 The impact on the land north of the River Wensum is altogether greater, both as to its physical extent and as to its effects. On the one hand, seeing the tower as part of the rest of development is entirely positive (on my evidence). That impact both signals regeneration and encourages it.
- 1.19 On the other hand the scale of what is proposed is significant, causing a degree of less than substantial harm to a number of heritage assets to the north. Here I note the impact on St Augustine’s Church (Grade I) and the associated almshouses (2-12 Gildencroft, Grade II), which I consider causes less than substantial harm. I identify the same level of harm in connection with parts of the historic townscape in St Augustines Street too.
- 1.20 To assist the Inquiry, I have prepared a table summarising my findings which I insert into my conclusions to this evidence (see **WH 2/1, Section 11.0**).
- 1.21 Any harm needs to be assessed on the basis of the state of the Application Site now (which is very poor, both visually and functionally).
- 1.22 Overall, I consider this part of the CCCA is enhanced by the scheme.
- 1.23 The proposals cause harm to several freestanding heritage assets near to the site (St Augustine’s Church and the almshouses associated with it; the historic townscape in St Augustines Street; and Doughty’s Hospital) but there is a countervailing benefit

arising from the improvement to the character and condition of the Application Site. The benefits are not enough to outweigh the harm completely, however.

- 1.24 The proposals also cause harm to some heritage assets in the city's core to the south: at Wensum Street/Fye Bridge, and the Anglican Cathedral. There are no direct countervailing heritage benefits here.
- 1.25 The harm identified may be justified in the terms of paragraph 196, and I have identified townscape and urban design benefits as part of my evidence.
- 1.26 In every case the detailed design of the proposals reduces or mitigates that harm (or will do, through the discharge of Reserved Matters applications).

