

TOWN AND COUNTRY PLANNING ACT 1990 - SECTION 77 AND TOWN AND COUNTRY  
PLANNING (INQUIRIES PROCEDURE) (ENGLAND) RULES 2000

John Neale MA IHBC

PROOF OF EVIDENCE ON BEHALF OF THE HISTORIC BUILDINGS AND MONUMENTS  
COMMISSION FOR ENGLAND (HISTORIC ENGLAND)

HE1/3 APPENDIX 2: Historic England Documents

Application for planning permission for the comprehensive redevelopment of Anglia Square and adjacent land on Edward Street for up to 1250 dwellings, hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship and associated works to the highway and public realm areas, Anglia Square, Norwich, by Weston Homes PLC.

Local Planning Authority Application reference: 18/00330/F

PINS reference: APP/G2625/V/19/3225505

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HE1/3

APPENDIX 2: HISTORIC ENGLAND DOCUMENTS

- Item 1 Letter dated 21 April 2017 from David Eve, Historic England, to Tracey Armitage, Norwich City Council
- Item 2 Letter dated 20 July 2017 from Edward James, Historic England, to Stuart Mills, Icen Projects
- Item 3 Paper presented to the meeting of the Historic England Advisory Committee on 03 May 2018
- Item 4 Final minutes (partially redacted) of the meeting of the Historic England Advisory Committee held on 03 May 2018
- Item 5 Letter dated 16 May 2018 from David Eve, Historic England, to Tracy Armitage, Norwich City Council
- Item 6 Letter dated 30 October 2018 from David Eve, Historic England, to Tracy Armitage, Norwich City Council
- Item 7 Email dated 23 November 2018 from John Neale, Historic England, to the Planning Casework Unit
- Item 8 Letter dated 07 December 2018 from David Eve, Historic England, to the Planning Casework Unit

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Historic England

Ms T Armitage  
Planning Service  
Norwich City Council  
City Hall  
St Peter's Street  
Norwich NR2 1NH

Direct Dial: 01223 582721  
Direct Fax: 01223 582701  
Our Ref.: PL0072770  
Date: 21<sup>st</sup> April 2017

Dear Ms Armitage

ANGLIA SQUARE INCLUDING LAND AND BUILDINGS TO THE NORTH AND  
WEST OF ANGLIA SQUARE, NORWICH  
ENVIRONMENTAL ASSESSMENT (EIA) SCOPING OPINION

Thank you for your letter of 10th March 2017 notifying Historic England of the Environmental Impact Assessment (EIA) Scoping Opinion for the proposed development at Anglia Square, Norwich.

The historic environment is a finite and non-renewable environmental resource which includes designated heritage assets, non-designated archaeology and built heritage, historic landscapes and unidentified sites of historic and / or archaeological interest. It is a rich and diverse part of England's cultural heritage and makes a valuable contribution to our cultural, social and economic life. A scoping report should establish if the proposed development has the potential for effects on cultural heritage. This should be dealt with in a specific Archaeology and Built Heritage chapter within an Environmental Statement. We advise that all supporting technical information (desk-based assessments, evaluation and post-excavation reports etc.) are included as appendices. Where relevant, the cultural heritage should be cross-referenced to other chapters or technical appendices; for example noise, light, traffic and landscape.

The EIA should consider the impact upon both designated and non-designated heritage assets. This should include the impact upon the setting of the heritage assets within the surrounding area. Archaeological evidence within the surrounding vicinity should be assessed and further consultation and advice should be sought from the Development Management Archaeologists and Historic Environment Record at Norfolk County Council.



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There are no designated assets within the boundaries of the proposed development. There are a number of designated assets within the immediate vicinity of the site and the conservation area bounds it at certain points. These could be affected by the development, but the scale of the proposed development is such that the wider conservation area including prominent listed buildings within it could also be affected. These and other designated and non-designated heritage assets which are affected by the development should be identified in the document and the impact of the proposals upon their significance assessed.

The assessment of the impact upon setting should include views from and towards any nearby heritage assets. Photomontages, wireframe models and/or similar techniques can be used to illustrate and assess the potential visual impact. The assessment of setting should not be solely restricted to visual impact, and should also consider the impact from other environmental factors such as noise, traffic and lighting, where relevant. Cumulative impact upon the setting of the designated and non-designated heritage assets should also be considered.

The request for a screening and scoping opinion sets out the proposed scope of the material to be included in an Environmental Statement in paragraphs 6.4 to 6.17. In paragraph 6.14 it is stated that the visual impact of the development will need to be assessed from representative viewpoints set out in a Built Heritage, Townscape and Visual Impact Assessment appended to the Environmental Statement. We notice that the Council have helpfully identified a number of viewpoints already and that Broadland Council have also identified an important view from the grade II\* registered Catton Park. These viewpoints should be included in the assessment.

The assessment should also take account of the potential impact which associated activities (such as construction, servicing and maintenance, and associated traffic) might have upon perceptions, understanding and appreciation of the heritage assets in the area. The assessment should also consider, where appropriate, the likelihood of alterations to drainage patterns that might lead to in situ decomposition or destruction of below ground archaeological remains and deposits, and can also lead to subsidence of buildings and monuments.

The assessment should be carried out in accordance with established policy and guidance, including the National Planning Policy Framework. Historic England also produced further guidance on setting entitled The Setting of Heritage Assets. Our guidance provides a thorough discussion of setting and methods for considering the impact of development on setting, such as the use of matrices.

The identification of Catton Park as a view point potentially affected by the development draws attention to the extent of study area proposed. From this we would suggest that a one kilometre area is insufficient and that careful consideration be given to heritage assets beyond this distance. There are a number of public spaces in the City conservation area some of which have elevated positions as well as notable historic buildings which command views. These should all be identified and assessed.

Whilst standardised EIA matrices are useful tools, we consider the analysis of setting (and the impact upon it) as a matter of qualitative and expert judgement which cannot be achieved solely by use of systematic matrices or scoring systems. Historic England therefore recommends that these should be seen primarily as material



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supporting a clearly expressed and non-technical narrative argument within the cultural heritage chapter. The EIA should use the ideas of benefit, harm and loss (as described in NPPF) to set out 'what matters and why' in terms of the heritage assets' significance and setting, together with the effects of the development upon them.

We would strongly recommend that you involve the archaeological staff at Norfolk County Council in the development of this assessment. They are best placed to advise on: local historic environment issues and priorities; how the proposal can be tailored to avoid and minimise potential adverse impact on the historic environment; the nature and design of any required mitigation measures; and opportunities for securing wider benefits for the future conservation and management of heritage assets.

We hope this advice is helpful. Please do not hesitate to contact us if you would like to discuss the matter further.

Yours sincerely



David Eve  
Inspector of Historic Buildings and Areas  
e-mail: david.eve@historicengland.org.uk



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Mr Stuart Mills  
Iceni Projects  
Flitcroft House  
114-116 Charing Cross Road  
LONDON  
WC2H 0JR

Direct Dial: 01223 582746

Our ref: PA00505609

20 July 2017

Dear Mr Mills

## Pre-application Advice

### ANGLIA SQUARE, NORWICH, NORFOLK

Thank you for consulting Historic England on the above proposed development. Anglia Square in Norwich has witnessed a number of attempts at positive redevelopment, and we welcome the opportunity to comment on this scheme for its regeneration.

#### Summary

Historic England support the principle of redevelopment on this Site. There is considerable potential for a scheme to redress long standing issues of connectivity and neglect with regard to Anglia Square, as well as enhancing its relationship with the rest of the city. However, Historic England consider that the scheme in its current form - specifically the proposed 25 storey tower - would result in harm to the historic character of Norwich and the significance of a number of designated heritage assets. In sum this would affect the character of place as a whole, by virtue of the negative effect the proposed tower, specifically, would have on the appreciation of the principal listed buildings/scheduled monuments within their setting, and the experience of Norwich's cityscape and conservation area.

#### Advice

The proposed scheme that has been submitted for pre-application advice is for a mixed use redevelopment of the area around Anglia Square. The scheme would involve the demolition of the majority of the buildings presently within the site, and would include the construction of c.1230 residential units, as well as a mix of leisure and retail facilities.

The development Site is situated to the north of the River Wensum and is bound by St Crispins Road to the south, Magdalen Street to the east, Edward Street and New Botolph Street to the north and Pitt Street to the west. It is within the Anglia Square character area of the Norwich City Centre conservation area, and there are a number



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of listed buildings in the near vicinity of the site. These are concentrated on Magdalen Street and St Augustine's Street to the east, north east and north-west. There are also a number to the immediate south of St Crispin's Road to the south-east of the site.

Norwich is a place of exceptional heritage significance, with the current settlement having origins in the Anglo-Saxon period. The city's form is derived from over 1000 years of development since that time, with key historical features including the city's early medieval street pattern and proliferation of churches and other religious buildings; its relationship to the River Wensum; the remaining medieval city walls; and the principal strategic landmarks of the two cathedrals, the castle, and the city hall clock tower. These, as well as the general grain, character and scale of a cityscape that includes a wealth of other highly significant heritage assets, are readily appreciated from vantage points outside the city centre, such as St James' Hill and potentially Catton Park, which is a Grade II \* Registered Park and Garden. With the exception of a small number of mid-twentieth century residential blocks of poor quality design and detrimental contribution to the cityscape, the taller or more obvious 'landmark' structures in the city are related to either historic or current civic or spiritual functions. This dynamic between important public buildings and the surrounding cityscape informs the significance and character of the place as a whole.

The Anglia Square area, although located in an historically significant area north of the River Wensum, witnessed considerable post-war change and development, to the extent that the majority structures from prior to the Second World War were demolished, and the street pattern was substantially realigned..

The development site does not contain any designated heritage assets. Only the now almost indiscernible alignments of part of what was St Botolph Street and St George Streets, as well as some nineteenth-century buildings (one of which is locally listed) fronting Pitt Street, remaining as elements of historical derivation. Several of the larger buildings presently within the site are vacant, and much of the western side of the site towards Pitt Street comprises car parking. The majority of the larger structures within the site are identified as negative buildings in the Norwich City Centre Conservation Area Appraisal, and Sovereign House was granted a Certificate of Immunity from Listing in May 2017. Historic England therefore welcome the principle of redevelopment as an opportunity to enhance this area of Norwich.

Although we consider that the Site can accommodate a development of some size and scale, concerns were expressed by Ben Webster in the pre-application meeting that the scale and massing of buildings along east and western fringes of the development would not respond appropriately to the context of its surroundings. Historic England echoes these concerns. The proposed reintroduction of the historic alignment of St Botolph Street and St George's Street is positively welcomed, as is the intention of



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reintroducing an element of connectivity at the site's southern fringe across St Crispin's Road by providing a new pedestrian crossing. The removal of existing negative buildings in the development site is also welcomed.

However, we consider that the proposed residential tower would be harmful to the character and significance of Norwich. Although the site is near the lowest part of the shallow valley in which Norwich sits and is therefore topographically 'lower' than other parts of Norwich to the south of the river, the proposed tower would nonetheless form a significant and intrusive new presence in the cityscape from key locations both within the city centre, and looking across it from external vantage points.

The principal heritage assets likely to be affected include:

- The Norwich Conservation Area (including the parts closest to the development Site, and also more broadly as the designated heritage asset that encompasses the place.
- Norwich Anglican Cathedral (Grade I), Catholic Cathedral (Grade I), Norwich Castle (Scheduled Monument & Grade I) and City Hall (Grade II\*). These are the four most prominent historic civic or ecclesiastical buildings within the City. All are of very high heritage significance, not only for their individual heritage values but also owing to their relationship with each other and the cityscape within which they sit, including long distance views across and through the cityscape.
- Scheduled sections of Norwich city wall to the north-west of the site, in particular recently revealed sections over which the proposed tower would be starkly visible.
- Other designated heritage assets, in particular St Augustine's Church (Grade II\*) and other listed buildings along St Augustine's Street, and Doughty's Hospital (Grade II) to the south of St Crispin's Road, in close proximity to the site.
- Catton Park Registered Park and Garden (Grade II\*). Although relatively far removed from the development site, it includes a view of Anglican Cathedral framed by planting, the significance of which has not been assessed. We noted at the meeting that this would be assessed as part of a planning application.
- Other designated and non-designated heritage assets throughout the cityscape. In particular, other designated churches feature on the skyline of Norwich, contributing to its character, including prominent examples such as St Peter



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Mancroft, situated near City Hall.

Of particular concern would be views of the proposed tower along historic thoroughfares and locations within the city centre, from where the tower's presence would compete unfavourably with the existing cityscape. One of the city's most significant public spaces is the cathedral close, and it is clear that the tower's presence would represent an intrusive addition above the roofline from vantage points within close. Its proposed height means also that it would appear as a dominant and out of scale addition in views along streets such as St George Street and Wensum Street to the south, and St Augustine's Street to the north-west. Furthermore, it would have a severely detrimental effect on the appreciation of the Grade II\* listed St Augustine's Church in its setting.

We recognise and appreciate the effort to reveal a greater proportion of Norwich Cathedral's spire in views along St Augustine Street. Unfortunately, however, we consider that the slight positive increase in the amount of spire visible is outweighed by the presence of the tower, which would compete with the spire and dominate the vista along this road, despite its visual separation from the spire itself.

The tower is also likely to have a negative effect on the appreciation of the recently revealed and repaired section of the scheduled Norwich City Walls on Magpie Road to the north, over which the proposed tower would protrude. This would diminish the appreciation of the wall in this location as a defensive rampart designed to shield the city physically and visually.

There is no precedent for a building of anything like the proposed height in this part of Norwich, particularly of residential character. There are good historical reasons for this, with the area of the city north of the River Wensum having been historically, and remaining, of a distinct form and character, set apart from the civic and religious heart of the city to the south. Whilst there are residential towers and office space of c.16 storeys in height in Norwich, these buildings are recognised in the Conservation Area Appraisal, and verbally at the pre-application meeting, as being examples of unsuccessful design in the cityscape, contributing negatively to its character.

Overall, we consider that the proposed tower would cause a severe level of harm to the cumulative heritage significance of the designated heritage assets discussed. It would have a negative effect on the character of the place as a whole and also on the appreciation of the principal designated heritage assets within their setting, and the experience of Norwich's cityscape. We also have concerns about its design quality.

The Framework emphasises the mutual dependence of the economic, social and environmental roles of planning (paragraphs 7 and 8). The 'Golden Thread' running



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through the Framework is a presumption in favour of sustainable development (paragraph 14). Achieving sustainable development requires that the three roles be sought jointly and simultaneously (paragraph 8). Paragraph 9 of the Framework also stresses that sustainable development involves seeking positive improvements in the quality of the built, natural and historic environment. Conserving heritage assets in a manner appropriate to their significance is one of the core planning principles of the Framework (paragraph 17). Paragraph 132 of the Framework requires planning authorities to place ‘great weight’ on the conservation of designated heritage assets, and states that the more important the asset the greater the weight should be. It also recognises that significance can be harmed by development within the setting of an asset. This paragraph also states that ‘any harm or loss should require clear and convincing justification’. It is also recognised in the Framework (paragraph 134) that where a development proposal will lead to “less than substantial harm” to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal.

Paragraph 56 of the National Planning Policy Framework (the Framework) emphasises that the government attaches great importance to the design of the built environment, highlighting that it is a key part of sustainable development indivisible from good planning and should make places better for people. The Framework also stipulates that planning decisions should aim to ensure that developments respond to local character and history, reflecting the identity of local surroundings and materials. Moreover, the Framework emphasises that developments should establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit as a result of good design and architecture (paragraph 58). The suggestion in the design statement that the tower’s design was influenced by the form and appearance of the Anglican cathedral was unpersuasive, and Historic England does not consider the scheme as it is currently envisioned to meet the Framework’s requirements.

Paragraph 7.91 of the Anglia Square Policy Guidance Note (NCC, 2017) notes that “There may be scope to provide a landmark building within the Site”, but also specifically makes clear that “A landmark building does not necessary need to be a landmark as a result of its height”. Historic England’s Advice Note 4: Tall Buildings makes clear that what can be considered a tall building varies according to the nature of the local area, and that inappropriately located tall buildings can have a lasting negative impact.

As it stands, Historic England consider the proposed scheme would cause a severe level of harm to the cumulative heritage significance of a number of highly graded heritage assets of international importance, as well as to the cityscape of Norwich itself. The key element that would create this harm would be the proposed tower. With



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only a small percentage of the scheme's proposed c.1230 residential units being provided by the tower, it would appear to provide limited public benefit. Although we appreciate the desire to signpost the proposed development, we consider that the proposed tower is not an appropriate way to do this, given the harm it would cause. A high quality destination should not need to rely on a tall building to highlight its presence. The information provided as part of this pre-application does not provide a clear and convincing justification for the harm the proposed tower would cause. Whatever the social and economic benefits of the proposed development, the harm it would cause to the built and historic environment mean that it could not be classed as "sustainable development", as per paragraph 8 of the NPPF.

### Next Steps

Thank you for involving us at the pre-application stage. Historic England cannot endorse the approach to the redevelopment of Anglia Square contained within these proposals. In view of our assessment that the proposed tower would cause serious harm to Norwich's historic character and could not be considered to form sustainable development in the sense of the Framework, we recommend that you consider an alternative approach to the site. Your current proposal does not address our concerns, as set out above, and so is unlikely to receive our support if submitted for statutory approval. Your scheme may benefit from our continued engagement; if so, we would welcome the opportunity to continue discussions through our Extended Pre-application service, details of which can be found on our website at [www.HistoricEngland.org.uk/EAS](http://www.HistoricEngland.org.uk/EAS). If you would like to discuss this option further, please do contact me. We would be happy to provide further advice, and may wish to seek the advice of the Historic England Advisory Committee in assessing the scheme.

Yours sincerely

Edward James

Historic Places Advisor, East of England

E-mail: [Edward.James@HistoricEngland.org.uk](mailto:Edward.James@HistoricEngland.org.uk)

cc:

Ben Webster, Design, Conservation and Landscape Manager, Norwich City Council  
Natalie Gates, Principal Advisor, Historic Places Team, Historic England

### ANGLIA SQUARE, NORWICH, NORFOLK Pre-application Advice



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**List of information on which the above advice is based**

Anglia Square, Norwich. Design Statement - Pre Application Submission June 2017.

Broadway Malayan

Anglia Square Non-Verified Massing Report June 2017. Cityscape

Built Heritage Assessment (draft) June 2017. RPS CGMS

Anglia Square Policy Guidance Note - Adopted March 2017. Norwich City Council



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## Historic England Advisory Committee

### Anglia Square, Norwich, Norfolk- Proposed Mixed-Use Development

Date of meeting: 03 May 2018

Presenter: David Eve, IHBA

## 1 Issue

- 1.1 Anglia Square is a partly-redundant complex of office buildings, shopping centre, cinema, and multi-storey car park developed in the late 1960s and early 1970s on a site within the medieval city of Norwich. The site has long been the subject of proposals for comprehensive redevelopment. An application has been submitted for permission to replace most of the buildings with a substantial, high-density mixed-use development. This includes several large multi-storey blocks and a 25 storey residential tower.
- 1.2 Historic England have accepted that redevelopment of the site will entail the erection of large new buildings but have raised concerns about the scale of the development now proposed and its impact on the character of historic Norwich, the city centre conservation area and key areas and buildings within it.

## 2 Recommendation

- 2.1 The Committee is invited to
- SUPPORT** a formal objection to the application in light of the assessment of HE staff
  - AGREE** that HE staff should continue to engage with the local planning authority to secure alternative proposals
  - AGREE** the key issue is the scale of the proposed development and
  - SUPPORT** a request for call-in by the Secretary of State should there not be sufficient improvement.

## 3 Key Background Information

### *Historic Context*

- 3.1 The historic city of Norwich developed in the broad valley of the River Wensum with significant settlements on both north and south sides of the river by the later Saxon period. Much of the layout of the present city dates from its dramatic expansion and redevelopment following the Norman conquest. This initially took place on the southern side of the Wensum with construction of the cathedral adjacent to the existing settlement starting in 1096 and the castle motte erected on higher ground to the south west. The timber castle was replaced by a grand stone keep in the 12th

century. The main market place was also laid out at this time and the longest circuit of city walls in England established between 1280 and 1340. By this time Norwich was one of the most important commercial centres in England, a status it maintained in the early modern period. Within the medieval city, parts of the walls of which still survive, there are extensive areas of surviving medieval streets set around multiple smaller market places with numerous medieval and post-medieval buildings including parish churches.

- 3.2 The chief civic and religious buildings lie in the southern part of the city. The castle and Anglican cathedral the Edwardian Roman Catholic cathedral (listed at grade I) and 1930s City Hall bell tower (II\*) are important landmarks. There are numerous church towers throughout the city, but many of the grander towers stand on higher ground in the south, including St Peter Mancroft and St Giles (both grade I). Norwich north of the river Wensum did not feature the prominent groups of major civic buildings or spaces found in the southern city though there are important groups, including near the Anglia Square site.
- 3.3 During the 19<sup>th</sup> and 20<sup>th</sup> centuries Norwich expanded beyond the city walls on all sides with extensive areas of terraced housing to the north, beyond Anglia Square. Inside the historic city an expansion of industrial and commercial sites resulted in the clearance of some areas of historic development. This was particularly pronounced on the northern side of the river and includes parts of the site now occupied by Anglia Square.
- 3.4 Despite the presence of Anglia Square and other modern developments of incongruous scale and quality, Norwich remains an extremely well preserved historic city, articulated by major monuments and a richness and quality of streetscape, and is one of England's most important historic cities.

#### *The Development Site*

- 3.5 Anglia Square is a 4.11 hectare site in the northern part of the medieval city, inside the city wall and included in the city centre conservation area. Historically the site was bisected by Botolph Street with Magdalen Street on its eastern side. These were two of the main historic routes into the city centre from the north. Properties fronted both streets with relatively large open areas behind them. During the 19th century large scale industry developed on and near the site. Following clearance of this and some areas of wartime bomb damage the site was redeveloped in the late 1960s and early 1970s along with construction of the inner ring road immediately beside it. The ring road separated the site from the city centre and included an overpass crossing Magdalen Street. Redevelopment of the site resulted in the removal of Botolph Street and building around it and on Magdalen Street along with other buildings on the site and the construction of the Anglia Square shopping centre and cinema. This is linked by raised roads to Gildengate House, a multi-storey office building, a multi-storey car park and Sovereign House.
- 3.6 Sovereign House is an imposing former government office building of eight storeys designed by Alan Cooke and Partners in 1968. It was assessed for listing by historic England in 2017 and granted a certificate of immunity. Two Edwardian buildings which stand at the edge of the site are identified as buildings of local interest in the City Council's Conservation Area Character Appraisal. Today a large part of the site is used for surface car parking, Sovereign House is disused and the multi-storey car

park closed due to its deteriorating condition. The large modern buildings on the site are all identified as negative buildings in the Appraisal.

### 3.7 *The Proposals and their Impact*

- 3.8 The proposed redevelopment of Anglia Square would remove all the existing buildings except Gildengate House and some of the retail space adjacent to provide a mixed-use retail, commercial and residential centre for this northern part of Norwich. The current application includes the Anglia Square site and two small land parcels adjacent and proposes a large mixed use development including a new cinema, hotel, multi-storey car park, retail and over 1200 residential units. Building on the main site would be based around two pedestrian routes on north to south and north-west to south-east alignments through the site reflecting the former routes of Botolph Street and the northern extent of St George's Street (another historic route removed by the 20th century redevelopment). Around these the new development would form three large blocks of building, with Gildengate House and some retail facilities retained at the south eastern corner of the site. The height of the proposed new building would exceed both the existing buildings on the site and those approved under previous planning permissions (see below). On the western side of the site a hotel would rise to 12 storeys with a continuous line of building descending to 5 storeys at its northern end. To the east of the hotel nine and seven storey blocks would face St Crispin's with elements of eleven storeys behind them. The northern side of the site would feature a block of building rising to six storeys and then stepping back before rising to eight. The new and partly retained retail and residential building facing Magdalen Street to the east would be four storeys. Most notably it is proposed to erect a 25 storey tower at the centre of the site.
- 3.9 The removal of the existing buildings on site would be welcome and the general arrangement of the new building would re-establish the line of two historic routes and place them in an active residential and commercial context. However, these benefits are outweighed by the impact of the scale of the proposed development.
- 3.10 The replacement of industrial buildings in the part of Norwich north of the River Wensum where Anglia Square is found has resulted in some large modern buildings including those on the application site. However, the proposed development would be of a significantly greater scale and massing and the proposed tower would be taller than other building in the city, and only just shorter than the cathedral spire. The southern part of the city where the cathedral, castle, market and many highly important places and buildings are found does feature some clusters of large modern buildings, including some relatively tall ones to the south of the castle. By contrast the historic city north of the Wensum features more low-rise building and it is set down in the valley bottom.
- 3.11 The proposed new building and in particular the 25 storey tower would therefore be prominent in views of the wider cityscape and conservation area. When seen from key points on the upper sides of the Wensum valley north of the city the cathedral spire remains a prominent and highly distinctive landmark. The proposed development and in particular the tower would challenge the spire in this role when the city is viewed from historic Mousehold Heath to the north east and potentially from Catton Park, a grade II registered landscape and Humphry Repton's first commission. It would also break the skyline and disrupt the long views of the tree-fringed covered high ground surrounding Norwich.

- 3.12 In key views from the castle mound and battlements the extent of the Wensum valley can still be experienced in views to the north with the general lack of tall buildings north of the river. The development is likely to be a prominent feature in these views with the tower far exceeding any historic or modern building in height and compromising an appreciation of the topography of the city and the other substantial parts of the development would also be prominent in these views.
- 3.13 The upper parts of the tower would be visible from parts of the upper cathedral close, which is enclosed by historic buildings of various periods and is separate from the wider city.
- 3.14 The development would also be seen when approaching the historic city centre along routes from the north, including on the historic St Augustine's Street and the tower above a section of the nearby city wall. Closer to the development site the western and southern sides of the new buildings would appear in views along several historic streets including St Augustine's and Magdalene Street. It would have a more intensive effect than the current building seen in these places due to the height and massing and the tower would be particularly intrusive. The grade II\* listed St Augustine's church presently stands opposite the surface car parking on the site but the new development would stand much closer to it with heights ranging from five to 12 storeys. This plus the tower would affect the setting of the church.

#### *National Planning Policy Framework*

- 3.15 The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting, local planning authorities shall have special regard to the desirability of preserving the building or its setting (Section 66(1)). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (Section 72).
- 3.16 The National Planning Policy Framework (NPPF) identifies protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7, 8 and 14). The conservation of heritage assets is a core principle of the planning system (paragraph 17) upon which the NPPF places great weight. The significance of listed buildings and conservation areas can be harmed or lost by development in their setting (paragraph 132). Clear and convincing justification should be given for any harm to the significance of heritage assets (paragraphs 17 and 132).

#### *Case History to Date*

- 3.17 The redevelopment of Anglia Square to provide a mixed use centre for the northern part of Norwich has been a strategic aim of the City Council for many years. Anglia Square was allocated for comprehensive mixed use development in the 2004 Replacement Local Plan and subsequently allocated in the Northern City Centre Area Action Plan (2010). Planning consents were issued in 2009 and 2013 for mixed use developments including retail, a cinema and 197 and 91 residential units respectively were not implemented. The replacement buildings approved under those permissions were not significantly higher than the tallest existing buildings on the site and Historic England did not oppose the applications.

3.18 The Northern City Centre Area Action Plan expired in March 2016 and a Planning Policy Guidance Note was issued by the Council in 2017. This aims to provide at least 900 residences on the site. It does not set precise limits on the height of new buildings. A landmark building is considered but the Plan notes that 'a landmark building does not necessary need to be a landmark as a result of its height'. HE were consulted on the current application in 2017 and advised that there could be a severe degree of harm to the historic significance of the historic cityscape, conservation area and some buildings and spaces within it because of the scale of the proposed development and particularly the height of the tower.

## 4 Considerations and Conclusions

- 4.1 HE staff have assessed the proposals and, based on the information so far available, conclude that because of its scale and massing and in particular the height of the proposed tower the development would neither preserve nor enhance the character and appearance of the Norwich city centre conservation area, and would result in a high level of harm to the historic significance of the area and a number of listed buildings within it.
- 4.2 Though severe, the harm is considered to be at a level falling short of substantial, in terms of the NPPF. The harm should therefore be weighed against the clear public benefit of redeveloping the site that could be delivered by the development. The proposed development would secure the policy objective of reviving a district centre. The proposed development would make a significant contribution to the City's housing need, delivering 2.5 years of the housing supply. It would bring substantial investment into a part of the inner historic city which is clearly in need of it and potentially assist a wider regeneration of this area. It would also result in increased employment.
- 4.3 The scale appears to derive in part from the cost of removing the existing development and the scale of the City Council's aspirations for the site. Even with this level of development, we have been told the development is not viable without the £12m the City Council have secured in funding from the Homes and Communities Agency to assist in preparation of the site, and the Council are considering waiving approximately £8m of Community Infrastructure Levy payments to further assist the viability of the scheme. The proposed level of affordable housing is 10%. The development is also inconsistent with the policy in the 2017 guidance note which states the development should regenerate the physical environment and help to preserve or enhance the historic character of the surrounding area and key views. In light of this, despite the public benefits set out above, HE staff question whether there is clear and convincing justification for so harmful a scheme.
- 4.4 HE staff would question if similar public resources could be deployed to achieve a smaller development that is more consistent with the historic city. HE staff consider an alternative approach which combined the benefits of reinstating the street pattern with development that was less harmful to the cityscape should be explored. The removal of the tower would significantly reduce the impact but would still fall short of the full aspirations for the role of the planning system set out in the Framework.

## **5 Who was consulted in the preparation of this report**

- 5.1 The following people were consulted in the preparation of this report: Clare Campbell, Principal Inspector of Historic Buildings and Areas, John Neale, Planning Director East of England, Edward James, Historic Places Advisor.

## **6 Appendices**

- 6.1 Appendix 1: Map showing Anglia Square site outlined in yellow.



## Historic England Advisory Committee

**Final Minutes of the 90<sup>th</sup> meeting held at 13.00 on Thursday 3 May 2018 in the Betjeman and Coade Rooms at Cannon Bridge House, London EC4R 2YA**

### **Members present:**

Professor Michael Fulford CBE (Chair)	Mr Charles O'Brien
Professor Tim Darvill	Professor Martin Daunton
Mr Michael Hayes CBE	Ms Rosemarie MacQueen MBE
Mr Michael Morrison	Ms Jan Wills

### **Staff present:**

Dr Andy Brown, HEAC Co-ordinator  
Dr Joseph Flatman, Head of Listing Programmes  
Mr Michael Guy, Head of Legal Services  
Ms Deborah Lamb OBE, Deputy Chief Executive  
Mr Ian Morrison, Director of Planning  
Mr David Sykes, Governance Officer (minutes)  
Mr Duncan Wilson OBE, Chief Executive

### **Presenters:**

Mr John Etté, Principal Adviser, Heritage at Risk (for item 9)  
Mr David Eve, Inspector of Historic Buildings and Areas (for item 8)  
Mr Simon Hickman, Principal Inspector of Historic Buildings and Areas (for item 9)  
Mr Simon Ramsden, Principal Planning Reform Project Adviser (for item 5)  
Dr Victoria Thomson, Head of Planning Advice (for item 7)

### **Guest:**

Professor Malcolm Airs (for item 9)

### **Item 1 – Apologies, Announcements, Declarations of Interest**

#### Apologies

1.1 Apologies for absence were received from Mr Paul Baker, Mr Chris Bolton, Mr David Lambert and Sir Laurie Magnus.

#### Announcements

1.2 There were none.

## Declarations of Interest

### 1.3 REDACTED

## **Item 2 – Minutes of the 89th meeting held on 15 February 2018**

2.1 The minutes of the 89<sup>th</sup> meeting of the Historic England Advisory Committee held on 15 February 2018 were agreed as a correct record.

2.2 There were no matters arising.

## **Item 3 – Update on Previous Business (REDACTED)**

3.1

## **Item 4 – Chair’s Action – 77-79 Mosley Street, Manchester (REDACTED)**

4.1

## **Item 5 – Planning Casework Reform Project: Phase I Update (REDACTED)**

5.1

## **Item 6 – Shrewsbury Flaxmill Maltings Update (REDACTED)**

6.1

## **Item 7 – Consultation on the revised National Planning Policy Framework (REDACTED)**

7.1

## **Item 8 – Anglia Square, Norwich – proposed mixed use development**

8.1 On 20 April 2018 members of the Committee and the Expert Advisory Group had undertaken a site visit and received presentations on the proposals for the redevelopment of Anglia Square, Norwich. The proposed development would remove all the existing buildings except Gildengate House and some of the retail space adjacent to provide a mixed use centre for this northern part of Norwich, which has been a strategic aim of the City Council for many years. Included in the proposal was a 25-storey tower in the centre of the site. Previous planning consents issued in 2009 and 2013 for mixed-use developments including retail, a cinema and 197 and 91 residential units respectively were not implemented. The replacement buildings approved under those permissions were not significantly higher than the tallest existing buildings on the site.

8.2 The current scheme was supported by a £12m grant from the Government’s Housing Infrastructure Fund. Members noted that Norwich City Council did not possess a tall buildings policy and that the proposed new buildings (and in particular the 25-storey tower) would be prominent in

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views of the wider city landscape and threatened to undermine the Cathedral's dominance of the cityscape. Furthermore, HE staff had assessed the proposals and concluded that because of the scale, mass and height of the proposed tower the development would not enhance or preserve the character of Norwich city centre conservation area.

8.3 In discussion members:

- questioned the proposal for large chain retail outlets within the development - given that there were significant outlets already within Norwich City centre
- suggested that the overall quality of the development's design was not as good as it could be
- suggested that there was little evidence of spaces for the community
- noted that the proposal had been subject to design review (by Design South East)

8.4 The Committee:

- a) AGREED, in light of the assessment of HE staff, to ENDORSE a formal objection to the application; and**
- b) AGREED to the continuing engagement by HE staff with the local planning authority to secure alternative proposals**
- c) AGREED that the main impact was a result of the scale of the proposed development and**
- d) AGREED to request call in by the Secretary of State should there not be sufficient improvement.**

#### **Item 9 – Parnham House – post fire repairs (REDACTED)**

9.1

#### **Item 10 – Any Other Business**

10.1 There being no other business the meeting closed at 15:55.

#### **Next meeting**

The next meeting of Historic England Advisory Committee will be held at 13:00 on **Thursday 28 June 2018** in the Betjeman and Coade room at Cannon Bridge House. Any associated site visits will take place on 14 June 2018.

**David Sykes**  
**Governance Officer**  
**4 May 2018**

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Historic England

Ms Tracy Armitage  
Norwich City Council  
City Hall  
St Peter's Street  
NORWICH  
Norfolk  
NR2 1NH

Direct Dial: 01223 582721

Our ref: P00848070

16 May 2018

Dear Ms Armitage

T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

**ANGLIA SQUARE INCLUDING LAND AND BUILDINGS TO THE NORTH AND  
WEST, NORWICH, NORFOLK  
Application No. 18/00330/F**

Thank you for your letter of 28 March 2018 regarding the above application for planning permission.

**Summary**

Norwich is one of England's great historic cities. This application proposes the redevelopment of the Anglia Square site with new buildings the massing and height of which would make them highly visible, resulting in severe harm to the historic cityscape and the settings of numerous historic buildings, important parts of the conservation area and other heritage assets beyond it. The proposed tower would be erected in a part of the city which historically did not have tall, symbolic landmark structures and would be far taller than any other building there. It would be visible in views over the city which features a group of landmark historic buildings south of the river Wensum, detracting from them and severely the harming the historic cityscape.

These large and incongruous buildings would cause a severe level of harm to the heritage assets in terms of the National Planning Policy Framework and the proposals fail to satisfy the Council's own heritage policies. Historic England support the redevelopment of Anglia Square in principle but would strongly object to the approval of the current application. If the Council propose to determine the application in its current form and are minded to grant consent we will refer the case

to the National Planning Casework Unit and request that it is called in for determination by the Secretary of State.

### **Historic England Advice**

This application proposes the redevelopment of Anglia Square and two smaller sites adjacent for a large mixed use development. Anglia Square is a 4.11 hectare site in the northern part of the medieval city, inside the city wall and included in the city centre conservation area. Historically the site was bisected by Botolph Street with Magdalen Street on its eastern side, but following clearance of large scale 19th century industrial building the site was redeveloped in the late 1960s and early 1970s with a shopping centre, large office buildings (Sovereign House and Gildengate House), cinema and multi-storey car park, and the inner ring road was built immediately beside it.

There have been previous proposals to redevelop the site and Historic England was consulted on the current scheme prior to this application in 2017. The current proposals would remove all the existing buildings except Gildengate House and some of the retail space in the south eastern corner of the site to provide a mixed-use retail, commercial and residential centre for this northern part of Norwich. Building on the main site would be based around two pedestrian routes on north to south and north-west to south-east alignments through the site reflecting the routes of Botolph Street and the northern extent of St George's Street. Around these the new development would mainly comprise three large blocks of building rising to 12 storeys at some places with a 25 storey tower towards the centre of the site.

### **Significance of Heritage Assets Affected**

Because of the scale of the proposed development and in particular the height of the tower it would have a visual impact on the wider landscape of the city, elements of the city centre conservation area and listed buildings and scheduled monuments within it, as well as a physical impact on the site of demolition and construction. We have therefore considered the significance of heritage assets over a wide area in order to assess the impact on them. Additional detail of the significance of these heritage assets is contained in Annex 1 attached to this letter.

The historic city of Norwich lies in the Wensum valley, with major historic landmark buildings on a series of hills on the south side, including the castle, city hall, Roman Catholic cathedral and the prominent churches of St Peter Mancroft and St Giles. The elevated positions of these buildings emphasises aspects of their historic status and illustrates the historic development of Norwich. The Anglican cathedral is lower down by the river but its tall spire can be seen with this group in views from the north and east. All these landmark buildings are listed at grade I or II\*. The grade I listed castle commands views over the valley from the motte and battlements. On the north side of the river the valley side slopes more gently and features more low-lying historic development.

Many aspects of the layout of the present city date from its dramatic expansion and redevelopment following the Norman conquest, including the market place framed by the 1930s City Hall (listed at grade II\*), St Peter Mancroft (grade I) and the Guildhall (grade I). There are spaces which originated in the Saxon period, such as Tombland and Palace Plain. The city walls were established between 1297 and 1334, enclosing a large area which contained extensive open land. Within the medieval city walls, parts of which still survive, there are extensive areas of surviving medieval streets with numerous medieval and post-medieval buildings, including 35 parish churches, a remarkable survival in northern Europe.

The Cathedral of the Holy and Undivided Trinity and the associated Benedictine monastery was largely complete by 1145 with a later spire rebuilt in the 14<sup>th</sup> century. One of the great Romanesque buildings of Europe, it is a major landmark in some areas of the city and appears in views approaching the city and from the more open northern side of the river valley including the upper slopes. Views from the River Wensum and Mousehold Heath show the cathedral to best effect.

The cathedral Upper Close is an intimate space defined by the precinct wall, the cathedral and a range of building associated with the monastic period of its history and a fine group of scheduled and grade II\* listed buildings around the 14<sup>th</sup> century former chapel of the Canary College. It has a distinct feeling of separation from the busy city beyond the precinct wall and is lined with historic buildings consistent in scale, form and materials. The Lower Close includes a large open area of playing fields between the river bank and the cathedral. This is one of the few places in the city from where the cathedral can be seen unimpeded and in a landscape setting; and no prominent modern buildings or development intrude into or detract from this important and beautiful scene.

Beside the Lower Close is Bishopsgate with the scheduled 14th century Bishop's Bridge and Great Hospital, one of Britain's oldest hospitals, founded in 1249, comprising St Helen's church, the hospital cloister, hall and master's house, all listed at grade I, and several other historic buildings including almshouses. At the western end of Bishopsgate is Palace Plain, a highly significant historic space surrounded by heritage assets including the cathedral precinct wall and Bishop's Gate (listed grade II\* and scheduled respectively), St Martin's church (listed grade I) and a range of historic houses listed grade II\* and II. Bedding Lane leads from the Plain to the river bank between small 19th century brick cottages.

Tombland is a roughly triangular open space outside the Close defined on one side by the precinct wall and buildings constructed against it, with historic building on the other sides, giving a remarkable consistency in form, materials and detailing which is largely undisturbed by modern development beyond the space. **Wensum Street**, leaves Tombland at its north-west corner before crossing the river to **Fye Bridge Street** and has a similarly dense pattern of historic building crowding the roadside dating from the 17th to 19th centuries, but again with considerable consistency of scale and traditional materials.

North of the River Wensum a network of historic streets converge on or border Anglia Square. **Colegate** runs parallel with the river and is lined with listed buildings of great historic and architectural value including a number of 18th century town

houses, non-conformist chapels and St George's church, many of high listing grades. From it St George's and Calvert Streets run northwards towards the application site; these are intimate in character, with small-scale red brick housing. **St. Augustine's Street** is lined with historic buildings, several listed and hiding 15<sup>th</sup>-17th century buildings behind later facades. The parish church of St Augustine (listed grade I) with its early 18th century brick west tower stands in a large churchyard with a terrace of six houses, numbers 2-12 Gildencroft.

Magdalen Street runs along the eastern side of the application site, between Magpie Road and the Wensum, and is divided by the inner ring road overpass. In the southern part there are continuous historic buildings built close to the roadside dating from the 16th to 19th centuries. The northern part of the Street has seen more modern development, but there are several buildings with 17th century work behind 18th and 19th century frontages. Some modern building is unsympathetic to this character, including Anglia Square itself, but much of it matches the height of historic building in the street.

Around St Augustine's Street and Magdalen Street are 19<sup>th</sup> century terraces of housing on Sussex Street, Esdelle Street and Leonard Street, Cowgate, Bull Close, Willis Street and Peacock Street. These have a modest, intimate character.

Parts of Norwich city wall remain standing on the northern edge of the conservation area, including a tall section on Magpie Road and smaller but longer parts set in a broad open area on Bakers Road (both are scheduled). Most of the wall along Magpie Road has been removed but Victorian terraced housing reflects its line and defines the edge of the conservation area. From these streets there is little large-scale modern development prominent in views of the walls, but some modest brick-built housing on Bakers Street which, like the Victorian terraces reinforces the former presence of the wall in a positive way.

Beyond the historic city Waterloo Park, a designed park of 1931-3 (registered at grade II\*), is set amongst contemporary housing development on its east and west sides, but the playing fields of an adjacent school have maintained an open aspect to the south beyond the boundary planting and with it a relationship with the city centre. At the top of the Wensum valley is Catton Park, the first commission for the celebrated garden designer Humphry Repton in 1788, now registered at grade II\*. The park had an intended relationship with the city below and the spire of the Anglican cathedral in particular. A belt of later planting screens the park from the modern outer ring road but the visual impact of features in the city beyond it remains important.

## **Impact of the Proposed Development**

The application includes a number of images which suggest the appearance the proposed new buildings might have in particular views. These have been produced to accepted professional standards and are valid and helpful aids in assessing impact. However, we have reviewed these images on site on several occasions and consider that the actual effect of experiencing some of the heritage assets in question, and, therefore, the proposed new building, could be more pronounced than they suggest. For example, the Cathedral spire is a more eye-catching and engaging

feature of the landscape in several of the depicted views when seen in person. Further detail of our assessment of impact on the heritage assets is contained in Annex 1, attached to this letter.

As described above, the topography and historic development of Norwich have resulted in a series of landmark historic buildings standing on high ground to the south of the River Wensum which appear in views over the city from the north and east. The castle, City Hall, Roman Catholic Cathedral and major parish churches including St Peter Mancroft and St Giles are joined by the Anglican Cathedral which, though standing on lower ground, is given greater prominence by its tall spire. Image 8, taken from Mousehold Heath, shows the proposed tower seen in combination with these buildings, detracting from an appreciation of the key buildings and city centre conservation area in a way that other modern buildings do not.

The proposed 25 storey tower would be by far the tallest building to the north of the Wensum and even with the elevated position of tall buildings to the south little would rival it. The scale and massing of the lower proposed buildings could make them more noticeable by comparison with other modern development in the area around Anglia Square and by bringing high-rise development to the north of the river depart from the historic character of development there. We consider this would harm the significance of the city centre conservation area and those key landmark buildings within it by diminishing their prominence and detracting from an understanding of their historic role.

From the north side of the Wensum valley Sovereign House can be seen from Waterloo Park, so the proposed tower would be visible. At Catton Park the Anglican Cathedral is a more prominent feature than image 1 seems to suggest. Views of the spire are an important part of the significance of the site and we are concerned that the tower could intrude in these designed landscapes and harm their significance by introducing an alien feature.

From the castle mound and battlements the development would be a prominent feature in views of the northern part of the Wensum valley (image 12) with the tower compromising an appreciation of this aspect of the city while the lower parts of the development could also be seen, rising above and concealing the ridge around the city. The development would detract from an appreciation of views commanded from the castle's symbolic and strategic defensive position.

Image 11 shows how the proposed tower would appear above the roof of the Guildhall in a view flanked by the market place, St Peter Mancroft and City Hall, bringing an element at odds with the character of this side of the space and with it a measure of harm to significance.

We are concerned that the upper part of the proposed tower could be visible from the churchyard of St Martin and several points in **Palace Plain** as well as Bedding Lane and the quayside. This could affect an appreciation of the designated heritage assets and this part of the conservation area through the intrusion of a modern building of scale into the space, resulting in harm to their significance.

Image 23 taken in Tombland shows the proposed tower visible where Wensum Street joins the space, while image 25 shows it in a view further down the Street. Image 26 on Fye Bridge suggests a viewer on the eastern side of the road would see the proposed development rising above the roofs opposite, while images 41 and 42 contain views of Magdalen Street, with the former showing the development having a quite overbearing effect. All these places are rich in historic buildings; many of them listed and are important elements of the conservation area which would be harmed by the intrusion of the proposed development.

Image 21 shows the tower above the roofs of an important range of listed and scheduled buildings at the north end of the Upper Close, an important space where the modern city does not intrude beyond the defensive precinct walls and where the tower would harm its historic significance. It is of serious concern that the proposed tower and possibly parts of the lower buildings would appear in one of the most important views of the cathedral from the Lower Close near the river from where the existing buildings can be seen. This is one of the best vantage points from which to see the cathedral in an open landscape within the historic city and we are deeply concerned that the visual impact on it would be marked, permanently spoiling this beautiful scene and result in harm to the significance of these heritage assets and in particular the Cathedral. (No visualisation has been produced for this important view.) Buildings around the Lower Close including St Helen's church and even Bishop's Bridge could also be affected.

Existing buildings at Anglia Square can also be seen from St Helen's House in the historic Great Hospital so the proposed development could be seen from open spaces around the Hospital complex. Intruding into the peaceful, secluded grounds of the Hospital would detract from this character and so from an appreciation of this remarkable historic complex, resulting in harm to the significance of the heritage assets.

North of the Wensum there is a network of historic roads converging on or close to Anglia Square where the proposed development will have a major impact. It would be seen beside and behind the Old Meeting House and Octagon Chapel on Colegate, (Images 39 and 40) possibly other gaps in the line of building on this road. The quality of architecture on Colegate and the sensitivity of this well preserved street is such that even glimpses of the tower, a feature alien in its form, scale and design, could detract from the character of this historic street. The development would also be visible on St George's Street and Calvert Street (images 37 and 38) and from Doughty's Hospital (image 44). These have been compromised by existing modern development but the proposed building would aggravate this, harming the significance of this part of the conservation area and the listed buildings.

North of Anglia Square the new development will be visible on St Augustine's Street (images 15 and 17), greatly increasing the already harmful effect of the existing buildings on the application site, the tower drawing the eye and detracting from an appreciation of the street, the historic city beyond Anglia Square and the cathedral spire. The same is possible at the northern end of Magdalen Street, near Magpie Road. The result would be not to enhance, but rather to harm the contribution the setting of the heritage assets makes to their significance. The tower is also likely to intrude on the Victorian Esdelle and Leonards Streets to the east of St Augustine's



Street, Sussex Street to the west and exacerbate the impact on Cowgate to the west of Magdalen Street, detracting from the simple, modest character of the terraced housing and so harm the significance of this part of the conservation area. Image 32 shows the proposed buildings having a far greater impact on the parish church of St Augustine and the adjacent cottages than the existing, with a substantial block of building facing the heritage assets and the proposed tower dominating their setting, resulting in marked harm to their historic significance.

Image 17 shows the proposed tower appearing above the section of scheduled city wall by the junction of Magpie Road and St Augustine's Street. We consider it might also be seen above buildings behind the section of surviving wall on Bakers Road and the line of Victorian terraced housing which follows the line of the wall on Magpie Road. The appearance of the tower would detract from an appreciation of the wall as an enclosing, defensive boundary. The former line of the wall and the conservation area boundary which follows it are defined in a positive manner by Victorian and later building of a suitable form and scale. The proposed tower could also intrude into views of these buildings resulting in harm to the significance of both wall and conservation area.

In addition to the specific heritage assets and parts of the conservation area where the information provided and our investigation has identified a harmful visual impact from the proposed development we are concerned that other areas would be affected. Highly sensitive historic areas or those of consistent traditional quality might be harmed by even occasional or partial views of the tower. In other areas the setting of heritage assets might contribute very little to their significance due to inappropriate building around them, but the proposed development would not enhance and might further harm that significance.

When these impacts are taken together, what becomes clear is that the proposed development would profoundly harm the character of the historic city. It would mar the richness and coherence of the cityscape. It would do so because its form and character would be radically at odds with the city's historic topography, character and grain.

## **Legislation and Policy Context**

### **Legislation, National Policy and Guidance**

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (section 66 (1)). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (section 72). In this case we would stress that several of the buildings affected by the proposed development are listed at grade I and II\* and so fall within the top 5.5% of listed buildings nationally, making adherence to the statutory duty even more critical in the determination.

The National Planning Policy Framework (NPPF) identifies the protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 6, 7, 8 and 14). Paragraph 8 states that 'to achieve sustainable development, economic, social and environmental gains should be sought jointly and simultaneously through the planning system' while paragraph 17 establishes the conservation of heritage assets as a core principle of the planning system. The NPPF places great weight upon the conservation of designated heritage assets, and the more important the asset, the greater the weight should be (paragraph 132).

The NPPF also states that the significance of listed buildings and conservation areas can be harmed or lost by development in their setting (paragraph 132). Paragraph 137 states that the Council treat favourably proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of heritage assets. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification. Substantial harm to or loss of designated heritage assets should be exceptional, or wholly exceptional, depending on the designation. Where a proposed development would lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss or certain tests are met (paragraph 133). Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use (paragraph 134).

Paragraph 56 of the NPPF notes the great importance attached to the design of the built environment and that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Paragraph 58 states that design policies and decisions should aim to ensure that developments should 'respond to local character and history, and reflect the identity of local surroundings and materials...'.

As the current application involves impact on the setting of numerous designated heritage assets it is important that the assets' setting, the contribution it makes to their significance and the impact of the development on that is correctly assessed. Historic England's Good Practice Advice Note 3; The Setting of Heritage Assets (2017) provides advice to this end.

### **Local Policy**

Anglia Square is not specifically identified in Norwich City Council's Adopted Local Plan (2014) but there are a number of policies in the Development Management Policies Document which guide development in the historic city. Policy DM1 ('Sustainable Development Principles for Norwich') states that '...development proposals will be expected...to...protect and enhance the ...heritage assets of the city and to safeguard the special visual and environmental qualities of Norwich...' Policy DM3 (c) states that 'significant weight will be given to the following design principles in assessing development proposals: Proposals should respect, enhance and respond to the character and local distinctiveness of the area. The design of all

development must have regard to the character of the surrounding neighbourhood and the elements contributing to its overall sense of place, giving significant weight to the uses and activities around it, the historic context of the site, historic street patterns, plot boundaries, block sizes, height and materials.’ DM9 (‘Safeguarding Norwich’s Heritage’) states that ‘all development must have regard to the historic environment and take account of the contribution heritage assets make to the character of an area and its sense of place. Development shall maximise opportunities to preserve, enhance, or better reveal the significance of designated heritage assets...’ The Supplementary Text appended to the Plan (paragraph 9.3) reinforces this by stating that ‘all opportunities to protect, conserve or better reveal the significance of nationally designated assets should be taken in new development.’

Anglia Square was allocated for mixed use development in the 2004 Replacement Local Plan and subsequently in the Northern City Centre Area Action Plan (2010). This Action Plan expired in March 2016 and a site specific Planning Policy Guidance Note for Anglia Square was issued by Norwich City Council in March 2017. In the absence of an adopted Supplementary Planning Document or site allocation in an Adopted Local Plan, the Policy Guidance Note is the only current Council planning policy document that specifically relates to the redevelopment of Anglia Square.

The Anglia Square Policy Guidance Note was produced in response to the particular form and nature of the present development proposals, rather than being a comprehensive options appraisal for the development of the site. It makes some general observations regarding the way development should respond to the conservation area and setting of nearby designated heritage assets but does not draw conclusions about the scale of new development.

Paragraph 3.18 of the Guidance Note states that “the height and traditional character of buildings and streets to the north and east of the site, (most immediately Magdalen Street, St Augustine’s Street and Gildencroft), needs to be respected in the redevelopment to ensure the buildings, streets and their settings are not unduly dominated or harmed by the new buildings.” It goes on to say (paragraph 3.23) “the buildings surrounding the site (other than the office buildings immediately bordering the site to the south) are of a traditional character forming terraced streets of two to three storeys in height, with new four storey flats opposite Edward Street. The relationship between the buildings on St Augustine’s Street and Gildencroft, including St Augustine’s Church, needs to be carefully considered so that their setting is respected in any redevelopment”.

The Guidance Note does not consider the possible visual impact on the historic cityscape of Norwich as whole, but does comment on some specific views. Paragraph 7.88 notes that ‘the redevelopment of Anglia Square offers opportunities to reinstate and improve views from the north of the site to major city landmarks, including the Anglican cathedral.’ However, paragraph 7.87 says that ‘a future planning application would need to address how the proposals can successfully integrate and improve upon the existing townscape character’ and there is a general statement on the setting of heritage assets (paragraph 7.90): ‘new development should be sensitive to the scale of existing buildings in its vicinity and must respect the setting of historic assets.’ It is stated (paragraph 7.91) that ‘there may be scope

to provide a landmark building within the site...[but] a landmark building does not necessarily need to be a landmark as a result of its height and particular attention must be paid to such proposals in view of the highly sensitive townscape of the St Augustine's Street area...'

An additional document which relates to the application site is the Norwich Conservation Area Appraisal (Anglia Square Character Area). This also contains management policies which include respecting the scale of existing development where new development meets it along Magdalen Street (policies D1, D3, E4).

## **Historic England's Position**

Historic England have considered the information provided with the current application and visited the site and its surroundings. From this it is clear that due to the massing and height of the proposed buildings there will be an extensive and severe impact on the character and significance of Norwich as an historic place, on key and highly important landmark historic buildings, important parts of the Norwich city centre conservation area and historic parks beyond it.

We have identified a number of locations in the city centre conservation area and the setting of numerous listed buildings, scheduled monuments and registered parks where the visual impact of the new buildings would cause harm to their historic significance, sometimes at a high level, by introducing building of an inappropriate form and scale. Many of these listed buildings and monuments are of national and even international importance and include key views of Norwich Anglican cathedral.

The proposed 25 storey tower block would be a prominent, obtrusive addition to views over the historic city in its river valley setting, in a part of the city which does not feature any tall buildings, to the detriment to the appreciation of major landmark historic buildings in the southern part of Norwich and the cityscape as a whole.

The city centre conservation area is a designated heritage asset of high importance, not least because it contains many spaces of historic significance surrounded by designated and undesignated heritage assets which give a rich historic character. Many of the listed buildings where the harmful impact of the proposed development would occur are highly graded, and therefore in the most important 5.5% of listed buildings, and are of national and even international importance. The richness of the historic city means the setting of these listed buildings and scheduled monuments often makes an important contribution to their significance and the harmful impact of the proposed development of serious concern.

Historic England consider that, in the terms of the NPPF, this impact would cause a severe level of harm to the significance and value of the historic place for this and future generations, although this would not be 'substantial harm' as referred to in paragraph 132. The development would not satisfy paragraphs 131, 132 and 137, which encourage proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of heritage assets. Nor would it satisfy paragraph 58 which seeks to ensure that developments respond to local character and history, and reflect the identity of local surroundings and materials.

The proposals would fail to achieve the overarching aims of the NPPF to promote sustainable development; that is development which can be achieved without causing harm to the historic environment. As the NPPF (paragraph 8) states, ‘to achieve sustainable development, economic, social and environmental gains [which include the conservation of heritage assets] should be sought jointly and simultaneously through the planning system.’ In this case the development would achieve few if any gains for designated heritage assets and these would be outweighed by the very high level of harm to their significance.

The development would also fail to satisfy the Council’s own heritage policies. The sheer scale of the proposed buildings mean that the development would not ‘protect and enhance the ...heritage assets of the city” or “safeguard the special visual and environmental qualities of Norwich...” (DM1); nor ‘respect, enhance and respond to the character and local distinctiveness of the area... [or]...have regard to the character of the surrounding neighbourhood’ (DM3c); nor ‘maximise opportunities to preserve, enhance, or better reveal the significance of designated heritage assets’ (DM9). As views of the proposed development, such as those from Cowgate, St Augustine’s churchyard and St George’s Street, show, the buildings would neither respect the character of the area or enhance the significance of heritage assets and by increasing the visual impact on them fail to enhance them.

Paragraph 132 of the NPPF states that ‘any’ harm to the significance of heritage assets requires ‘clear and convincing’ justification. We consider that the high level of harm and great importance of many of the heritage assets involved demands especially clear and utterly compelling justification. Paragraph 134 suggests that part of such a justification might be found in public benefit resulting from a development. In this case the housing and facilities provided would be a benefit and the Council should assess this. The present buildings and undeveloped parts of the site are negative aspects of the conservation area and redevelopment presents opportunities to enhance the area and the contribution their setting makes to the significance of the heritage assets. However, the harm caused by the proposed buildings’ massing and height would decisively outweigh the heritage benefits of the demolition of existing buildings and recreating the route of the north part of St George’s Street.

As stated above, the NPPF requires the Council to weigh the public benefit arising from the proposed development against the harm to the historic environment (and against any other detrimental effects relating to other areas of policy). However, the presumption of the NPPF in favour of sustainable development is that the economic, social and environmental gains should be sought jointly and simultaneously. In promoting any scheme harm to the significance of designated heritage assets should be avoided or, if this is not possible, minimised. The current proposals have not taken opportunities to minimise their harmful impact. The inclusion of tall buildings in large blocks, and in particular the 25 storey tower, increases the visual prominence of the development with a scale and massing at odds with the historic character of the city. This has exacerbated, rather than minimised the harmful impact and rendered any enhancement of the heritage assets’ significance negligible.

While Historic England understand the importance of securing the redevelopment of Anglia Square, in the view of the severe level of harm the proposed scheme would cause to the historic environment we consider that the whole approach to

development needs to be rethought. We would be keen to work with the Council to explore how different approaches to the site could deliver a more appropriate development.

As the application stands, Historic England strongly object to the granting of permission on the grounds of the harm the proposed development would cause to Norwich's historic character and to the significance of designated heritage assets, as described above. We would very much welcome the opportunity to engage with the Council and the applicants to consider a revised approach to Anglia Square which would secure the site's redevelopment in a manner more in accord with the character of Norwich. If the Council are minded to grant permission for the current proposals we will refer the case to the National Planning Casework Unit and ask that it be called in for determination by the Secretary of State.

We have made our assessment based on the information provided and our investigation on site. This clearly established a high level of harm would result from the development. However, several other heritage assets are likely to be affected by the development for which additional images should be produced. Details of these are contained in the attached Annex, but we would stress that the harmful impact on the Lower Close and Great Hospital are of particular concern and likely to be at a high level.

## **Recommendation**

Historic England strongly object to the application on heritage grounds and recommend on these grounds that it be refused. The proposed development would result in severe harm to Norwich's historic character, to the historic significance of the Norwich city centre conservation area as a whole, to several important spaces within it and to numerous scheduled monuments, listed buildings and registered historic parks, many of them designated at a high grade.

We consider that the application does not meet the requirements of the NPPF, and note in particular both that the NPPF requires that economic, social and environmental gains should be sought jointly through the planning system, and that the great weight it accords to the conservation of designated heritage assets should be greater the more important the asset or assets (paragraphs 8 and 132). In this case, the proposed development would cause great harm to the historic environment, while the importance of the designated heritage assets whose significance would be harmed by the development rather than conserved could scarcely be greater.

In determining this application your Council should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the buildings or its setting or any features of special architectural or historic interest which it possesses and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form and are minded to grant consent we will refer the case to the National Planning Casework Unit and request it to be called in for determination by the Secretary of State. Please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

A handwritten signature in black ink, appearing to be 'DE', written in a cursive style.

David Eve  
Inspector of Historic Buildings and Areas  
e-mail: [david.eve@historicengland.org.uk](mailto:david.eve@historicengland.org.uk)

## **APPLICATION 18/00330/F: ANGLIA SQUARE, NORWICH: PROPOSED MIXED USE DEVELOPMENT**

### **ANNEX 1**

This is an addition to Historic England's letter of advice to Norwich City Council dated 16th May 2018 concerning proposed development at Anglia Square. This annex consists of two parts. Firstly it gives more detailed consideration of the significance of Norwich as an historic city, the city centre conservation area, specific parts of the conservation area, buildings within it and registered historic parks in the vicinity. The second part is a more detailed assessment of the visual impact of the proposed development on those heritage assets. It also contains further details of the locations where we have identified potential visual impact on heritage assets and consider additional images are required.

#### **Significance of Heritage Assets Affected by the Proposed Development**

Because of the scale of the proposed development and in particular the height of the tower there would be a visual impact on the wider landscape of the city, elements of the city centre conservation area and listed buildings and scheduled monuments within it as well as the physical impact on the site of demolition and construction. We have therefore considered the significance of heritage assets over a wide area in order to assess the impact on them.

#### **Norwich City Centre**

The historic city of Norwich developed in the valley of the River Wensum with significant settlements on both north and south sides of the river by the later Saxon period. The topography of the valley is an important factor in the character of the city with a series of steep hills on the southern and eastern sides and a more open, gently sloping valley to the north of the river with building and tree-lined ridges defining the valley in the distance. While the pattern of earlier settlement can still be seen in some places many aspects of the layout of the present city date from its dramatic expansion and redevelopment following the Norman conquest. This initially took place on the southern side of the Wensum with construction of the cathedral starting by 1094 and the castle motte on higher ground to the south west, both clearing existing parts of the town. The main market place was also laid out at this time.

The city walls were established between 1297 and 1334, enclosing a large area which contained extensive open land. By this time Norwich was one of the most important commercial centres in England, a status shown in the growth of market areas beyond the main market place, including specialist livestock and cloth markets. Within the medieval city walls, parts of which still survive, there are extensive areas of medieval streets set around multiple smaller market places with numerous medieval and post-medieval buildings including 35 parish churches, a remarkable survival in northern Europe.

The establishment of the main part of the Norman city on the southern side of the Wensum led to the construction of the chief civic and religious buildings here, many of them utilising this high ground. Norwich north of the River Wensum did not feature



the prominent groups of major civic buildings or spaces found in the southern city though there are several churches and important historic streets and spaces where houses were built or rebuilt in the post-medieval period by the wealthy merchants of the city.

During the 19th and 20th centuries Norwich expanded beyond the city walls on all sides with extensive areas of terraced housing to the north, beyond Anglia Square. Inside the historic city the expansion of industry resulted in the clearance of some areas of historic development. This was particularly pronounced along the river where commercial wharfage and water supply remained valuable and on the northern side of the river, including parts of the site now occupied by Anglia Square. However, despite the presence of Anglia Square and some other modern developments of incongruous scale Norwich remains a well preserved historic city, with major buildings and a richness and quality of streetscape which make it one of England's most important historic cities.

### **Landmark Historic Buildings**

Norwich is notable for a group of highly significant historic buildings which are landmarks in the city and whose visual prominence reveals much about their historic significance. Together they tell a story about the development of the city and play a strong role in contributing to its aesthetic character.

The keep of Norwich castle (scheduled and listed at grade I) is raised on a substantial earthwork motte which exploited the existing topography of rising ground above the River Wensum. This was constructed by William the Conqueror and a timber fortification erected by 1075. The motte was raised to its full height by around 1100 following which the timber castle was replaced by a grand stone keep in the characteristic Norman style. The extensive outer baileys, outer works and defensive ditch system were established and expanded through the 12th century and while partly removed and obscured still leave their mark in the layout of surrounding roads and properties. The keep was refaced by noted architect Anthony Salvin in 1835-8, replicating the Norman decorative work which so distinguishes the building. Subsequent phases of use as prison and museum have added to the building on the motte but the keep is still a prominent feature in the cityscape emphasising its historic status as a royal castle and one of the most important Norman architectural and military works in Europe. From the castle mound and battlements commanding views can also be had over the historic city and Wensum valley, as the original builders intended to enable it to fulfil its defensive function.

Norwich market place was established to the west of the castle ditch in the late 11th century along with the parish church of St Peter Mancroft (listed grade I). The present church was reconstructed starting in 1430 and was re-consecrated in 1455. The church is large and richly decorated with a grand west tower and of high architectural quality. The church itself is perhaps the preeminent parish church in the city and has long played an important role in its life. Its position at the north-west corner of the Market Place is also an elevated one and the tower is a major landmark. The Guildhall (listed at grade I) stands opposite St Peter Mancroft across the market place. It was built in 1407-13 but incorporates an earlier undercroft. Containing courts and ceremonial rooms it is a major civic building of the period and enjoys a formal relationship with the church and the City Hall. This grade II\* listed

building was built to designs by CH James and SR Pierce in 1937-8 when the Market Place was re-established to its full extent. It stands at the western side of the Market Place on high ground, with a formal relationship with the market place and castle. In addition to its importance to the city it is a major piece of inter-war civic architecture and the grand campanile tower at the northern end a major landmark.

In the same way that the City Hall occupied a symbolic position by the market place and Guildhall, the Roman Catholic cathedral of St John the Baptist (1882-1910 by George Gilbert Scott Jr. and J. Oldrid Scott; listed at grade I) was built on the top of a hill just outside the line of the City Walls at Grapes Hill. The cathedral is a dramatic work of architecture in the Early English style of the 13th century and marks a major moment in the reestablishment of the Catholic church in England. Its elevated position makes its grand tower a major landmark in views across the city along with City Hall's tower, the spire of the Anglican cathedral and other parish churches, including St Peter Mancroft.

The parish church of St Giles (listed grade I) on Pottergate dates from the 14th century but has a tower – the tallest of any parish church in the city – of the early 15th century. It rises through four buttressed stages and is surmounted by an elegant 18th century cupola. Its position on the high ridge of ground leading from the market place to the southern city walls makes St Giles' tower a notable landmark in the southern city, seen in combination with the towers of City Hall, St Peter Mancroft and The Roman Catholic cathedral.

Also on the southern side of the River Wensum but not set on high ground above it is the Cathedral of the Holy and Undivided Trinity. Construction on the site of the Saxon Conesford district started before 1094 and was largely complete by 1145. The associated buildings of the Benedictine monastery around the cloister to the south of the cathedral were occupied by 1101. The cathedral has seen many phases of addition and alteration over the subsequent centuries, not least rebuilding of the 13th century spire after its collapse in 1362. These have added to its architectural and historical richness but at its heart the building remains, in the words of Pevsner's 'Buildings of England', 'one of the most complete major Romanesque buildings in Europe (Pevsner and Wilson: Buildings of England, Norfolk volume 1 page 188).

The cathedral acts as a major landmark with an elegant and distinctive spire which appears in views in some areas of the city around the river, in a number of views approaching the city and from the more open northern side of the river valley as well as certain locations in the south. The spire is seen to best effect from the upper slopes of the Wensum valley north of the river, including views from Mousehold Heath to the north-east. Pevsner notes this view as being particularly valuable in revealing the full extent of the building's original plan. These views also show the spire in combination with the landmark buildings on higher ground in the southern part of the city, emphasising their historical status and illustrating important elements of the historic city plan.

### **Spaces within the historic city**

Norwich Close consists of a number of spaces and routes around the cathedral and cloister with often quite distinct characters. The Upper Close is a rectangular green space defined to the east by the Cathedral, the former cellarer's range and cloister

garth of the monastery and to the west by a line of building constructed inside the precinct wall. The northern end of this rectangular space is enclosed by the former chapel of the Carnary College founded 1316. This scheduled monument is an important example of the Decorated style of architecture prefiguring the later Perpendicular style and is unusually raised on a basement with circular windows. The chapel is the centre of an attractive group of buildings leading to the Erpingham Gate (also scheduled) connecting the Close with Tombland. It is flanked by School House, a brick facade of 1852 hiding the College's medieval hall and showing two elaborate doorways and School End House, a 15th century house with attractive shaped gables of the early 18th century. These are both listed at grade II\*.

The Upper Close is remarkable for its quietness and a feeling of separation from the busy city beyond the precinct wall. The buildings around it cover a large range of dates but are surprisingly consistent in scale, form and materials, including a Norwich School building dating from 1955. There is little or no visual intrusion of modern building from outside the Close, which emphasises the historically important separation from the city and allows a better appreciation of this ancient space. The great cathedral closes of England are important for their role as seats of power, learning and influence in the history of England and their buildings are part of that story. At Norwich the secluded feeling of the Close allows a better appreciation of this remarkable heritage.

By contrast the Lower Close consists of more varied spaces. Some are intimate and enclosed, but a significant part is a large open area, today used as playing fields by Norwich Lower School; this stretches from the river bank westwards almost unbroken to the east end of the cathedral. Views of the cathedral from the riverside and playing fields are flanked by historic buildings on Ferry Lane and Hook's Walk, many of them listed, and the modern buildings of the Lower School. These are low-lying with tiled roofs sloping towards the playing fields which reduce their prominence. The cathedral rises dramatically in these views with the informal arrangement of the Bishop's Gate, buildings adjoining it, the buildings of the Great Hospital, including the tower of St Helen's church and 43-44 The Close (a grade II\* listed brick house of 1670) forming a backdrop.

The Lower Close is one of the few places in the city from where the cathedral can be seen at its full height in a landscape setting, rather than being partially glimpsed or only the spire seen rising above rooftops. It can also be seen in combination with the river and across an area still partly free of buildings, as the whole of this area is likely to have been in the early period of its history. The spire is also seen in combination with the tower of St Helen's church, the church of the Great Hospital, the only other medieval religious house in Norwich to fully retain its cloister. Modern buildings are not prominent in these views and there is nothing of such height as to intrude into and detract from this important and beautiful scene.

The area of the Lower Close is bounded on its northern side by Bishopsgate, a road which crosses the Wensum at the scheduled 14th century Bishop's Bridge and passes the Great Hospital, one of Britain's oldest hospitals, founded in 1249 and still operating. The grand tower of St Helen's was built in 1375 and to the north of the church is the hospital's cloister, hall and master's house, all listed at grade I. The site contains several other buildings including almshouses dating from the early 19th and

20th centuries, several more modern buildings and St Helen's House, an elegant Georgian and 19th century house at the western side of the complex, listed grade II\*. The Great Hospital is a complex of buildings, some of great historical value in themselves, others of less interest but all telling the story of a remarkable medical institution and set in a riverside site that remains peaceful and with a sense of being set away from the city.

At the western end of Bishopsgate is Palace Plain, a highly significant historic space sitting adjacent to the cathedral precinct and in the vicinity of the Saxon town on the north side of the River Wensum. The Plain is overlooked by the parish church of St Martin situated on a raised churchyard beside the road. Listed at grade I, the church has origins in the 11th century but was considerably developed in the 15th and 16th centuries and portions rebuilt in the 19th. The plain is framed by two main groups of historic buildings. On the southern side, opposite the church is the scheduled and grade I listed Bishop's Gate. This grand entrance to the historic cathedral precinct dates from around 1436 and has the grade II\* listed precinct wall attached on one side. The western side of Palace Plain is lined by four late 18th/early 19th century listed town houses including Cotman House, listed at grade II\* and the 17th century White Lion public house. These give a strong, somewhat formal sense of enclosure to the Plain. Bedding Lane is a narrow road leading from Palace Plain to the river bank between small 19th century brick cottages.

Outside the cathedral close is Tombland, the site of the market place of Saxon Conesford. It is a roughly triangular open space with its base to the north where Palace Street and Wensum Street, two routes over the Wensum, diverge. One side of Tombland is defined by buildings constructed against the outside of the precinct wall and the grand Erpingham gate stands at the northern end in a substantial section of exposed wall. Opposite are 15th century buildings with an Edwardian façade ('Take Five' bar), the 16th century Augustine Steward House and other historic buildings while the grade II listed Maid's Head Hotel forms the base of the triangle and conceals multiple buildings from the 15th century onwards behind its Edwardian façade. As an historic space Tombland's origins lie in Norwich's early development, and the buildings around it are a rich amalgamation of development over the subsequent centuries. The dense pattern of historic building, crowding the roadside and rich in historic value and character, has a remarkable consistency in form, materials and detailing which is largely undisturbed by modern development beyond the space.

Wensum Street, which leaves Tombland at its north west corner before crossing the river to Fye Bridge Street has a similarly dense pattern of historic building crowding the roadside dating from the 17th to 19th centuries but again with considerable consistency of scale and traditional materials. The chancel of the church of St Simon and St Jude (listed at grade I) is set back in its churchyard on the western side, where the historic Elm Hill joins the road. This character continues through Fye Bridge Street and Magdalen Street, where continuous historic buildings built close to the roadside date from the 16th to 19th centuries. A large number date from the earlier period, several having been re-fronted, but all show a consistent scale and use of traditional materials. Some of the earlier buildings are high-status houses and the 14th and 15th century grade I listed parish churches of St Saviour and St

Clement stand set back a little from the roadside in small churchyards. Occasional modern infill buildings respect the historic scale and even use some of the materials.

Colegate runs westwards from Magdalen Street parallel with the north bank of the River Wensum. The street is lined with listed buildings of great historic and architectural value including a number of 18th century town houses and earlier buildings. Two non-conformist chapels of historic importance and architectural merit, the Old Meeting House of 1693 and the 1753 Octagon Chapel (grade I and II\* respectively), are set back from the street front, the former at the end of a narrow path.

There are a number of such breaks in the building line on the north side of the street as well as narrow streets leading to the modern inner ring road where they are curtailed. The entrance to St George's Street is flanked by the grade I listed church and Lowes Yard, a merchant's courtyard house of 15th to 18th century date listed at grade II\*. The Street features an early 16th century house along with modern housing of a scale and design suited to the area. Calvert Street is lined with 18th and 19th century brick houses, with some appropriately-scaled modern infill. At the northern end Cross Street continues in a similar style before reaching St Crispin's Road. Access from Colegate beside the Old Meeting House to a car park provides a route to Golden Dog Lane, another street with a mixture of densely built, small scale brick infill housing and historic building including the grade II listed Doughty's Hospital. This is an 1869 rebuilding of 17th century almshouses and forms an intimate courtyard of modest red brick accommodation immediately beside St Crispin's Road overpass. The character of these streets is intimate and small scale, with the modern infill building reflecting the form and scale of historic building on Magdalen Street and Colegate, though beyond these streets some large modern buildings on the inner ring road which intrude into this

The northern part of the conservation area to the north and west of the application site is defined by Bakers Road and Magpie Road which themselves follow the line of the city wall. In this area, between Magdalen Street and the River Wensum, St Augustine's Street is the principle historic route entering and leaving the city. It originally joined Botolph Street at the western side of what is now the Anglia Square site where it joins Pitt Street.

From the junction with Magpie Road St. Augustine's Street is lined with historic buildings, densely packed and built close to the roadside, all of two storeys and faced in brick or painted render. Both sides of St Augustine's Street feature groups of grade II listed buildings. Some date from the late 18th or early 19th centuries but several have later facades hiding 16th or 17th century buildings. On the western side of St Augustine's Street number 22-24 and 26-30 contains elements of 15th century hall houses behind the late 18th and 19th century street facades. At the southern end of the street number 71 St Botolph's Street is built over a grade II\* listed 15th century undercroft which extends under the pavement showing the medieval origins of the Street.

The area around St Augustine's Street has been affected by extensive low-rise modern development but contains areas of building dating from the 19th century. Sussex Street on the west side of St. Augustine's Street is a straight broad road

developed with a formal arrangement of two or three storey brick terraced houses dating from the early 19th century, many of which are listed at grade II. Esdelle Street and Leonard Street are terraces of small, simple Victorian brick houses built directly on the side of the narrow streets until the eastern end of Esdelle Street, where narrowing of the street has allowed planting. These terraces have seen some changes, but retain the character of the 19th century infill development of open areas within the historic city by dense and uniform residential building. The sense of a character as distinct from the more varied building on the older streets (such as St Augustine's) and from the larger modern building of Anglia Square is enhanced by the low visibility of the latter.

The parish church of St Augustine (listed grade I) chiefly dates from the 14th and 15th centuries but it is notable for its brick west tower, constructed in 1726. The church stands in a large churchyard with an open aspect and is defined on the southern side by a terrace of six houses, numbers 2-12 Gildencroft. These originated in the 16th century and have seen several phases of alterations since and are listed at grade II. They form an attractive group with the church which stands at the southern end of St Augustine's Street. The busy road system and buildings of Anglia Square beyond are an intrusive and negative aspect of these buildings' setting.

Magdalen Street runs along the eastern side of the application site between Magpie Road and the St Crispin's Road overpass. It has seen more modern development than the section south of the overpass but there are several buildings with 17th century work behind 18th and 19th century frontages. Other buildings date wholly from the late 18th or 19th centuries but are consistent in their scale, materials and detailing. Some of the modern building is not sympathetic to this character, chiefly because of the long street frontages and design details but it is at least not excessive in height for the historic character of the street.

Cowgate, Bull Close, Willis Street and Peacock Street are a group of narrow streets to the east of Magdalen Street mainly comprising modest 19th century terraced housing with some sensitive infill building but some open 'gap' sites, a car park and extensions to premises on Magdalen Street breaking up the consistency of building to some extent. The character of these streets is quite intimate as befits their modest origins but the openings in the building lines, particularly on the west towards Anglia Square allow visual intrusion of modern buildings out of scale with the area.

Norwich's city wall was built between 1297 and 1334 and was the longest circuit of city walls in England. The scale of the walls and the area they enclose still attest to the power and wealth of one of the greatest commercial centres of medieval and early modern England. Even where the walls are no longer standing their course often still defines properties boundaries and building plots and guides the routes of more modern roads. In the area north of Anglia Square these roads – Bakers Road and Magpie Road - in turn define the edge of the conservation area. Some sections of the wall remain standing here and are designated as scheduled monuments.

Bakers Road features a terrace of pleasant red brick Victorian houses facing the road and a broad area of grass beyond. The line of the city wall and some standing masonry can be clearly determined in views along the Road with the boundary walls of properties to the south serving to indicate its former presence. At the eastern end

of Bakers Road there is a more substantial section of wall with a tower attached, both of which can be clearly seen from the Road. There is a substantial section of wall with part of a tower attached immediately to the east of the St Augustine's Street junction. Framed between two buildings fronting onto Magpie Road it has quite a dramatic effect and gives a clear indication of the scale and visual authority the walls must have had when complete and unimpeded by building outside the city. The walls are no longer standing along the rest of Magpie Road until the eastern end where it joins Magdalen Street but the road runs parallel with the line of the wall.

The visible sections of city wall on Bakers Road and Magpie Road and the open spaces in which they and the line of the wall can be appreciated are important evidence of the boundary of the medieval and early post-medieval city. When seen from the edge of the conservation area (historically 'outside' the city) buildings of two storeys with pitched tiled are seen above the surviving walls or beyond their line. Where there are unbroken terraces of Victorian housing in front of the line of the wall on Magpie Road there is also no sign of larger non-traditional buildings beyond the terraces. This setting helps reinforce the historic presence of the city walls and particularly the surviving standing sections and is a positive aspect of the conservation area.

### **Sites Outside the Historic City**

Beyond the historic city are several parks and historic landscapes on the upper slopes of the Wensum valley which have a relationship with the city below. Waterloo Park was opened as a recreation ground for the expanding city in 1904 but redeveloped in 1931-3 to feature a pavilion and formal walks and planting as well as sports pitches. It is an important example of interwar garden design and registered at grade II\*. The park is set amongst contemporary housing development on its east and west sides but the playing fields of an adjacent school have maintained an open aspect to the south beyond the boundary planting.

At the top of the Wensum valley near the current northern ring road is Catton Park, which in 1788 became the first commission for noted garden designer Humphry Repton and is registered at grade II\* in recognition of its importance in the development of his work and English landscape gardening. The site descends from Catton Hall on the higher north western part. The southern boundary towards Norwich is screened from the modern housing beyond the park by a belt of trees which Repton's illustration of the park suggests is a later screen but there is a clear sense of the city in the valley below and the horizon on the opposite side of the Wensum valley, especially during winter. The cathedral spire can be clearly seen from the higher parts of the park and there appears to be an intended break in the planting by the Oak Lodge entrance to the park to frame one view of it. While the planting plays a valuable role in separating the park from the bustle of traffic outside it the visual interrelationship with the city, including with the cathedral spire, is important as it was a consideration in Repton's design.

### **Impact of the Proposed Development**

The application includes a number of images which suggest the appearance the proposed new buildings might have in particular views. We understand these have been produced to accepted professional standards and are valid and helpful aids in

assessing impact. However, we have reviewed these images on site on several occasions and consider that the actual effect of experiencing some of the heritage assets in question and the proposed new building could be more pronounced. For example, the Cathedral spire is a more eye-catching and engaging feature of the landscape in several of the depicted views when seen in person.

As described above the topography and historic development of Norwich have resulted in a series of landmark historic buildings standing on high ground to the south of the River Wensum which appear in views over the city from the north and east. The castle, City Hall, Roman Catholic Cathedral and major parish churches including St Peter Mancroft and St Giles are joined by the Anglican Cathedral which though standing on lower ground is given greater prominence by its tall spire. There are a number of modern buildings of some height in the southern part of the historic city but many of them are set on lower ground or cluster together and are relatively low, so do not draw the eye. One exception to this is the 16 storey Winchester Tower built near Chapelfields in the 1960s. However, as image 8 shows the city's major historic landmark buildings are clearly seen and the proposed tower would appear in combination with them because of its sheer height and despite its position on lower ground north of the river. Part of the reason the proposed tower is so prominent in this view is the lack of other tall buildings on the north side of the Wensum. This is partly because major historic buildings were not constructed on high ground to emphasise their role and status as in the south. There is nothing close to the scale of the proposed 25 storey tower to the north of the Wensum and even with the elevated position of tall buildings to the south little to rival it. The scale and massing of the lower proposed buildings could make them more noticeable by comparison with other modern development in the area around Anglia Square, but the tower would detract from the historic cityscape as a whole by competing with those major buildings to the south of the river and by bringing high-rise development to the north of the river, so departing from the historic character of development there. We consider this would harm the significance of the city centre conservation area and key buildings within it.

Other views of the proposed tower from the upper slopes of the north side of the Wensum valley could affect other heritage assets. When visiting the site the top of Sovereign House could be seen from Waterloo Park, suggesting that the proposed tower would intrude into an experience of the formal designed landscape. At Catton Park there is more vegetation between the designed park and the city but the Anglican Cathedral is a more prominent feature than image 1 seems to suggest and views to this are a key part of the significance of the site. There appears to be greater potential for the proposed tower to be seen in views from the park near Catton Hall, particularly in winter, which would detract from the views of the cathedral and significance of the landscape. We are therefore more concerned than the application documents might suggest that the tower could intrude into both these designed landscapes and harm their significance by introducing an alien feature.

There are a number of heritage assets and spaces within the city centre conservation area where the proposed development would have a visual impact affecting the significance of listed buildings and the conservation area. From the castle mound and battlements the extent of the north side of the Wensum valley can be seen, as can the partly wooded ridge enclosing the valley. The development



would be a prominent feature in these views (image 12) with the tower far exceeding any historic or modern building in height and compromising an appreciation of this aspect of the city. Other substantial parts of the development could also be prominent in these views, appearing against the ridge beyond the city. Referring to the strategic defensive position of the castle the development would detract from an appreciation of the topography.

To the west of the castle the Norman market place also exploited high ground within the city and image 11 shows how the proposed tower would appear above the roof of the Guildhall in a view of the space bounded by the market place, St Peter Mancroft and City Hall. It is reasonable to assume from this image that the tower would also be seen from the steps and balcony of City Hall. There is little intrusive modern building visible on the northern side of the market place due to the falling ground level towards the Wensum. The proposed tower would bring an element at odds with the character of this side of the space and with it a measure of harm to historic significance. It is the height of the tower that would make it visible, despite the difference in ground level. Image 13 also shows it partly visible when looking northwards on Exchange Street, raising the possibility that that it might also prove to be visible in other streets and spaces in this part of the city with a north-south axis.

The Built Heritage Statement (page 42) states that the development will have no impact on the setting of the church of St Martin at Palace Plain, although no image has been produced. However, we are concerned that the upper part of the proposed tower could be visible from the churchyard and points in the Plain when looking toward Anglia Square, from the entrance to the Bishop's gate when the trees are leafless and at the Palace Street entrance to the Plain. It is also unclear how the tower might appear from Bedding Lane behind Palace Plain and the quayside, although image 27 shows it visible across the river from the quayside upstream from Fye Bridge. The appearance of the tower from Palace Plain and Bedding Lane could affect an appreciation of the designated heritage assets and this part of the conservation area through the intrusion of a modern building of scale into the space, resulting in harm to their significance.

Image 23 is the view northwest from Tombland and shows that the proposed tower would be visible where Wensum Street joins the plain. It would therefore appear in a space largely undisturbed by discordant modern building and in the view towards the end of Tombland and the Maid's Head Hotel. Image 21 also shows the effect of the tower appearing above the roofs of an important range of listed and scheduled buildings at the north end of the Upper Close. Like Tombland, this is a highly important historic space and one where the modern city does not intrude beyond the defensive precinct walls. We consider that in both cases the intrusion of the tower would detract from the character of the spaces resulting in harm to the significance of designated heritage assets and these parts of the conservation area.

No image has been produced of the visual effect of the proposed tower in views from the Lower Close, but when visiting the site the top of Sovereign House was clearly visible. We are greatly concerned the proposed tower and possibly parts of the lower buildings would appear in one of the most important views of the cathedral from the Lower Close near the river. This would include the buildings around the Lower Close including St Helen's church. The tower might even be visible near Bishop's Bridge.

On the basis of the information available we are concerned this would result in harm to the significance of these heritage assets and in particular the cathedral. This is one of the best vantage points from which to see the cathedral in an open landscape within the historic city and we are deeply concerned that the visual impact on it would be marked, permanently spoiling this beautiful scene.

The visual impact on the more immediate setting of St Helen's church and the associated Great Hospital is also of concern. The top of Sovereign House can be seen from the first floor windows of St Helen's House, which stands at the western side of the core of the historic Great Hospital complex. It is therefore probable that the proposed tower would be seen from important formal rooms in this grade II\* listed house, but also from open spaces around the Great Hospital. If this tall modern building intruded into the peaceful, secluded grounds of the Hospital it could detract from this character and so from an appreciation of this remarkable historic complex, resulting in harm to the significance of the heritage assets.

Image 25 shows the proposed tower clearly visible in views down Wensum Street, intruding into the streetscape as an alien element and out of scale with the other buildings. Image 26 from Fye Bridge shows the proposed development obscured, but it appears if the viewer was on the opposite side of the road it would be visible, rising above the roofs on the western side of the road. The southern part of Magdalen Street has a similarly rich historic character and images 41 and 42 contain views along it looking towards Anglia Square. In the latter the massing of the lower parts of the proposed development can be seen above buildings on the west side of the street, but in image 41 the effect is quite overbearing.

The gaps between buildings and roads leading northwards from Colegate have potential to allow views of the proposed buildings as this area is close to the development site. Images 39 and 40 suggest that the two historic chapels, the Old Meeting House and the Octagon would partly obscure the development when seen from Colegate. The tower is likely to be more visible behind them, both in the Old Meeting House burial ground and the lane behind it. The quality of architecture on Colegate and the sensitivity of this well preserved street is such that even glimpses of the tower, a feature alien in its form, scale and design could detract from the character of this historic street. A more direct visual impact is suggested by images 37 and 38, looking northwards on St George's Street and Calvert Street, respectively. Modern development at Anglia Square and on St Crispin's Road has already affected views to the end of these roads and the courtyard of Doughty's Hospital at the end of Golden Dog Lane, but these images suggest a marked intensification of this effect, especially where the tower can be seen. Image 44 shows the re-clad Gildengate house visible above the almshouses but it appears a view across the courtyard from further east would reveal also the tower rising dramatically above the hospital.

The conservation area on the north side of the inner ring road around Anglia Square contains a number of areas from which the new development is likely to be visible. Images 15 and 17 indicate the possible visibility in views along St Augustine's Street heading towards the city centre. The existing buildings on the site and in particular Sovereign House form a visual barrier at the southern end of the street but the images suggest the height and overall massing of the new buildings would increase

this effect. The cathedral spire is partly visible above the existing buildings and this will remain the case but the negative effect of large modern buildings seen at the end of the Street would also remain and be intensified. As the images show, the tower would appear to rise above the buildings on St Augustine's Street, drawing the eye and detracting from an appreciation of the Street, the historic city beyond Anglia Square and the spire. The result is not to enhance, but rather harm the contribution the setting of the heritage assets makes to their significance.

The same is likely to be true of Esdelle Street and Leonards Street to the east of St Augustine's Street. Sovereign House can already be seen on the latter street so the tower would certainly be visible in this view and may also affect views from the former. This small area of small, simple Victorian terraced houses have a distinct character but the visual intrusion of the proposed tower could affect an appreciation of it and harm the significance of this part of the conservation area. Unfortunately no image has been produced of viewpoints in these streets.

The Built Heritage Statement (page 115) submitted with the application notes that the new development would be visible from the upper floors of buildings on Sussex Street, to the west of St Augustine's. No images of this effect have been produced and it is not clear if the tower would be visible from ground level in Sussex Street itself, although it would probably be clearly seen at the western end of the street. We are concerned that the intrusion of a tall modern building into this formal early 19th century street would detract from this aspect of this character and harm the significance of the grade II listed buildings and this element of the conservation area.

On the western side of the development site the proposed buildings would be closer to the parish church of St Augustine (listed grade I) than the existing Sovereign House which already has a major impact on the church's immediate setting. However, some parts of the new building, such as the hotel would be higher. As image 32 shows this would present a substantial block of building towards the heritage assets rather than the finely grained, lower scale development in which the church would historically have been set. This would detract further from the building's setting. The sheer height of the proposed tower would dominate both listed buildings. The result would be marked harm to their historic significance by further reducing the contribution their setting makes to that significance.

When travelling southwards along Magdalen Street or approaching the Magpie Road junction the existing buildings of Anglia Square are not prominent, but it is unclear if the additional height of the tower would make it visible above roofs on the western side of the street and no images have been produced. Though there is modern building on this part of Magdalen Street it is not much higher than the more traditional buildings around it; so the tower could still be a markedly different intrusion into the streetscape, which could harm to the significance of this part of the conservation area,

Image 35 indicates the substantial increase in a bulk of new building that would be seen at the end of Cowgate, looking west. Views from Willis Street and Peacock Street have not been provided, but the effect from the latter could be similar but with the 25 storey tower more prominent. The tower might also be visible above the rear of buildings on Magdalen Street when looking west along Willis Street. While the

present multi storey car park visible in image 35 and Gildengate House and the cinema visible from Peacock Street are not positive elements in the setting of this part of the conservation area the proposed new buildings would have a far greater impact because of their scale.

Image 17 gives an indication of how the proposed tower might appear above the section of scheduled city wall by the junction of Magpie Road and St Augustine's Street. There is presently no building visible above the wall and the presence of the tower would detract from an appreciation of this structure as an enclosing, defensive boundary. Sovereign House can already be seen above and between roofs to the south of the section on Bakers Road so it is likely the tower would be clearly seen from here too. The boundary walls and scale and form of buildings south of the wall on Bakers Road are akin to those of historic properties in this part of the city and so serving to visually reinforce the notion of the wall formerly containing development. The intrusion of the tower into this scene would detract from the contribution that this setting makes to the historic significance of the scheduled wall and of this part of the conservation area. The Victorian terraces on Magpie Road also define the line of the city wall and conservation area in a positive way. No modern building is visible above them but we are concerned the proposed tower could be seen from Magpie Road, from the footpath on the north side of the Road and other vantage points such as Starling and Heath Roads. We are concerned the intrusion of the tower into this scene would detract from this part of the conservation area and so harm its historic significance. A substantial section of the city wall also survives at the junction of Silver Road and Bull Close Road where it can be seen in combination with the Cathedral spire. The wall could also be seen in combination with the proposed tower, but the impact of this is uncertain. Unfortunately no images have been provided to illustrate this effect or that on Bakers Road or Magpie Road.

### **Impact on Other Areas**

From the images provided by the applicant and our inspection of a number of sites we conclude that the proposed new development would in some cases increase the negative impact on the conservation area and individual designated heritage assets made by the existing buildings at Anglia Square, sometimes considerably so. In other places the visual impact would be entirely new, usually because of the height of the proposed tower. The latter would affect the city centre conservation area as a whole by changing important views over the city as well as views from individual streets and heritage assets.

As well as the places identified above, the images submitted with the application show there will be an impact on others where the quality of the contribution made by setting of the listed buildings or parts of the conservation area is already adversely affected by modern development but the proposed development will compound this effect and not enhance the significance of these assets. For instance, image 36 taken on Colegate shows a line of modern building rising above more traditional roof tops but indicates that the proposed tower will rise still higher. The former church of St James, the Norwich Puppet Theatre (listed at grade I; see image 19), has an immediate setting with few historic buildings and chiefly comprising modern commercial development of some size and a large roundabout. These make no contribution to or better reveal the significance of the listed building, but the

proposed tower will add a new element to this, a tall modern building further detracting from the church and not enhancing it.

In other places there are streetscapes of more traditional character or greater historic value where the images suggest the tower would only be glimpsed. In image 27, taken from the south bank of the River Wensum near Fye Bridge, the proposed tower would appear between tiled roofs of the modern Friars Quay development. This is a positive part of the conservation area and the roofscape enhances the setting of the tower of St Clement's church (listed at grade I), but the proposed tower would intrude on that scene, detracting from both church and conservation area. The views from Elm Hill (image 22) and on Exchange Street (image 13) show how the tower would detract from these locations, but these images raise the possibility that the tower could be glimpsed in other sensitive locations which are difficult to predict. Such is the quality of many historic streets in Norwich and the lack of intrusive modern buildings detracting from them that even glimpses of the tower could have a negative impact.

### **Assessment of Impact**

The locations where the development would be visible and impact upon the historic townscape appear to be more numerous than is suggested by the application documents or our investigation on site. Paragraph 128 of the NPPF requires applicants to submit sufficient details to allow the local planning authority (and consultees) to assess the impact of proposed development on the historic environment. We have identified the existing Sovereign House visible in the setting of several major heritage assets (Waterloo Park, the Great Hospital and the Lower Close, including the Anglican cathedral). This suggests the applicants' assessment process was incomplete and we would wish to see a revision of the Built Heritage Assessment based on a thorough reassessment.

It is for the applicant to provide details of the full extent of the visual impact so the Council and others can assess its effect, but we have identified a number of areas where additional images of the proposed buildings are needed. These are as follows: Sussex Street, Esdelle Street, Leonards Street, Bakers Road, Magpie Road, Palace Plain and Bedding Lane, the Great Hospital and Bishopsgate, and the northern part of Magdalen Street, Willis Street and Peacock Street, the Lower Close, Waterloo Park and Catton Park (a location closer to Catton House which better reveals the Anglican cathedral and proposed tower). We would stress that in all cases the images should be taken from a point where the maximum extent of the new development can be experienced in the context of the historic environment.

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Historic England

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Direct Dial: 01223 582721

Our ref: P00848070

30 October 2018

Dear Ms Armitage

T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

**ANGLIA SQUARE INCLUDING LAND AND BUILDINGS TO THE NORTH AND  
WEST, NORWICH, NORFOLK**  
**Application No. 18/00330/F**

Thank you for your letter consulting Historic England on amendments to the proposed scheme for the redevelopment of Anglia Square. This letter provides a consolidated response to the application.

**1. Summary of Historic England's Position**

Norwich is one of England's – and Europe's – great historic cities. Set in the valley of the River Wensum, the historic centre of Norwich can still be read as having been defined by the longest circuit of city walls in medieval England. Containing more medieval churches than any city north of Alps, large numbers of historic buildings, many of exceptional interest, and streets and spaces rich in character, the centre of Norwich is an extraordinary historic place. The heart of the city is articulated by its major landmarks. On the hills to the south of the river, stand the castle, City Hall, the Roman Catholic cathedral, and a number of the most prominent churches, including St Peter Mancroft and St Giles. Below them, near the river, is the medieval cathedral, one of the great churches of Europe, whose spire rises to form the central landmark of the city. Norwich north of the river has its own character, the streets within the circuit of the walls still rich in historic incident, but without the landmarks of the south.

Historic England consider that the proposed redevelopment of Anglia Square would severely harm the city's extraordinary historic character, damaging people's

appreciation of both the significance of the city's great monuments –the Norman castle, the medieval cathedral, the Roman Catholic cathedral, City Hall and the numerous medieval churches which support them – and that of the rich historic cityscape, formed of streets, spaces, and the historic buildings by which they are defined. That harm would be engendered by the disparity of the scale of the development as a whole, which would be foreign to the character of the city, and by the proposed tower, which, rising to 20 stories, would radically disrupt the character of the cityscape, formed as it is by the interplay of city's topography, its great monuments and the wider pattern of streets and spaces in which the latter are set.

The reduction of the tower's height from 25 to 20 stories – the principal amendment made to the scheme since its original submission – would not materially reduce its impact on Norwich's character. While it would no longer be visible from some of the places from which the original tower would have been visible it would remain a prominent and alien feature; and an additional photomontage confirms that the tower would be visible in – and damaging to – the wonderful prospect of the cathedral as it is seen from the Lower Close.

This application therefore raises fundamental questions about the future of Norwich – and indeed, about the future of all historic cities, as if so harmful a development were permitted in so special a place what protection would any historic city have against similar treatment? These questions can be boiled down to one. What should be our vision for the future of Norwich?

Historic England's response is this. Norwich is a great historic city which provides a rich and stimulating theatre for contemporary life. We know that historic places are valued for their attractiveness, provide fertile ground for creative and innovative businesses, attract tourism (a major contributor to Norwich's economy) and are wonderful places in which to live. We also know that historic places are adaptable, that they have the capacity to accommodate growth and to add to their character with fine contemporary buildings which combine modernity and a natural respect for the grain and character of their setting. Norwich can change and grow without damaging the essential character which makes the city so special.

Implicit in this application is another vision – that Norwich should subordinate its extraordinarily rich character to the supposed imperatives of a particular type of contemporary development. The proposed development alone would severely harm that character which makes Norwich so special. Were it to be built there is little reason to believe that further development of similar character would not follow in the future.

No one disputes that the failed 1960/70s development of Anglia Square harms the city, although it does provide some facilities which are highly valued by those who use them. The applicants argue that the scale of the proposed development is necessary to make the redevelopment of Anglia Square viable. We have not independently assessed their viability assessment, but we note that they have not carried out detailed exploration of alternative approaches and are sceptical of their assessment of the approach suggested by a community group as a scheme appropriate to the character of the city. We therefore question whether they have



provided a clear and convincing justification for the approach they propose and the harm it would cause.

We understand the applicants' scheme would not be viable, and would depend for its success on public subsidy comprising a grant of £12,000,000 from Homes England via the city council and exemption from contributing to the community infrastructure levy. If public subsidy of this scale is required to redevelop the site it is reasonable to ask what it might achieve if the underlying principles of the scheme were to be changed radically. Could this level of subsidy bring about a development scheme appropriate to the character of the city? We would expect public subsidy, if required, to be used to fund a scheme which would enhance the character of the city, not harm it.

In assessing the proposed redevelopment of Anglia Square Historic England's remit is both to consider the impact of the proposed development on the historic monuments, buildings and spaces of the city, and to look at broader questions of the conservation and appreciation of the historic city as a whole, and the contribution that its historic character and significance make to Norwich's present and future vitality as a place. We consider, unequivocally, that the proposed development would severely harm Norwich's significance, and that of the city's major monuments, and that of many of the historic streets and spaces, and the historic buildings which define them, which together make up the cityscape. All are protected by what are often the highest levels of designation, and as an ensemble their importance is outstanding. We consider that the development would strike at the character that makes Norwich so special. In doing so it would also compromise the qualities that make cities such as Norwich so attractive to contemporary life.

In view of the harm the proposals would cause to so many and such important designated heritage assets, we consider that the scheme runs counter to all national and local policy concerned with the protection of the historic environment – policy set out above all in the National Planning Policy Framework and in the local plan, and buttressed by relevant legislation.

It follows that Historic England recommend that your council refuse planning permission for this scheme. Were the scheme to be approved the implications would be of national importance so should your council be minded to grant planning permission we will ask the Secretary of State to call in the scheme for his own determination.

Historic England do not believe that your council need choose between the proposals contained in this application and the further decay of Anglia Square. There is no doubt that Anglia Square presents an opportunity for development which could bring many benefits to the city, but it is one which we consider should be taken in a manner which accords with the character of the wider cityscape – one which would realise the National Planning Policy Framework's aspiration for sustainable development which reconciles social, economic and environmental benefits. We are keen to work with the City Council, the community and the owners of the site in pursuit of this goal.

## 2. Historic England Advice on the Revised Application

This application seeks planning permission for the comprehensive redevelopment of Anglia Square. It is proposed to replace the existing buildings, which date from the 1960s and 1970s, with a very substantial development which would include a hotel, cinema, shopping centre, car park and over 1,000 residential units. The proposed development would be arranged so as to reinstate something of the lost streetscape of the site, and to create a new view from within the site towards the Anglican cathedral. The amended plans contain a number of changes to the initial proposals, of which the most important is the reduction of the tower from 25 to 20 stories in height.

Historic England consider that the amendments would have no material effect on the impact of the proposed development on the character and significance of Norwich as a historic city. Whilst they would change its effect on certain areas and buildings within the city, the development as a whole would still have a severely damaging impact on Norwich as an historic place, on the significance of the city's greatest historic buildings and on that of many others, on historic spaces within the city and on historic parks beyond it. We have, however, amended our detailed assessment where appropriate in response to the revised material.

## 3. The Significance of the Designated Heritage Assets Affected

The starting point for Historic England's assessment of the impact of the proposed development is an understanding of the significance of the designated heritage assets which it would affect – whether scheduled monuments, listed buildings, registered landscapes or the historic cityscape designated as a conservation area. Because of the scale of the proposed development, and in particular the height of the tower, it would have a visual impact on the wider landscape of the city, elements of the city centre conservation area and listed buildings and scheduled monuments within it, as well as a physical impact on the site in the form of demolition and construction. (We do not consider the physical impact of the scheme on the site itself; others will comment on archaeological questions to which this may give rise.) We have therefore considered the significance of heritage assets over a wide area in order to assess the impact on them. Additional detail of the significance of these heritage assets is contained in the annex attached to this letter.

The historic city of Norwich lies in the Wensum valley, with **major historic landmarks** on a series of hills on the south side, including the castle, city hall, Roman Catholic cathedral and the prominent churches of St Peter Mancroft and St Giles. The elevated position of these buildings emphasises aspects of their historic status and illustrates the historic development of Norwich. The Anglican cathedral is lower down by the river but its tall spire can be seen with this group in views from the north and east. All these buildings are listed at grade I or II\*. The castle, one of the major Norman fortifications of 12th century Europe (grade I), commands views over the valley from its motte and battlements. On the north side of the river the valley side slopes more gently and features more low-lying historic development.

Many aspects of the layout of the present city date from its dramatic expansion and redevelopment following the Norman conquest, including the **market place**, now

framed by the 1930s City Hall (grade II\*), St Peter Mancroft (grade I) and the Guildhall (grade I). There are spaces which originated in the Saxon period, such as Tombland and Palace Plain. The city walls were established between 1297 and 1334, enclosing a large area which contained extensive open land. Within the medieval city walls, parts of which survive, there are extensive areas of medieval streets with numerous medieval and post-medieval buildings, including 35 medieval parish churches, a remarkable survival in northern Europe.

The **cathedral** of the Holy and Undivided Trinity and the associated Benedictine monastery were largely complete by 1145, although the cathedral's spire was rebuilt in the 14th century. One of the great Romanesque buildings of Europe, the cathedral is a major landmark across the city and appears in views approaching the city and from the more open northern side of the river valley including the upper slopes. Views from the River Wensum and Mousehold Heath show the cathedral to best effect.

The cathedral's **Upper Close** is an intimate space defined by the precinct wall, the cathedral and a range of building associated with the monastic period of its history and a fine group of scheduled and grade II\* listed buildings around the 14th century former chapel of the Carnary College. The **Lower Close** includes a large open area of playing fields between the river bank and the cathedral. This is one of the few places in the city from where the cathedral can be seen unimpeded and in a landscape setting; and no prominent modern buildings or development intrude into or detract from this important and beautiful scene.

Beside the Lower Close is **Bishopsgate** with the scheduled 14th century Bishop's Bridge and Great Hospital, one of Britain's oldest hospitals, founded in 1249 and comprising St Helen's church, the hospital cloister, hall and master's house, all listed at grade I, and several other historic buildings including almshouses. At the western end of Bishopsgate is **Palace Plain**, a highly significant historic space surrounded by heritage assets including the cathedral precinct wall and Bishop's Gate (listed grade II\* and scheduled respectively), St Martin's church (grade I) and a range of historic houses (listed grade II\* and II).

**Tombland** is a roughly triangular open space outside the Close defined on one side by the precinct wall and buildings constructed against it, with historic buildings on the other sides, giving a remarkable consistency in form, materials and detailing which is largely undisturbed by modern development beyond the space. **Wensum Street**, leaves Tombland at its north-west corner before crossing the river to **Fye Bridge Street** and has a similarly dense pattern of historic building crowding the roadside, dating from the 17th to 19th centuries but again with considerable consistency of scale and traditional materials.

North of the River Wensum a network of historic streets converge on or border Anglia Square. **Colegate** runs parallel with the river and is lined with buildings of great historic and architectural value including a number of 18th century town houses, non-conformist chapels and St George's church, many of listed at high grades. From it **St George's and Calvert Streets** run northwards towards the application site; these are intimate in character, with small-scale red brick housing. **St. Augustine's Street** is lined with historic buildings, several listed and hiding 15th-

17th century buildings behind later facades. The parish church of St Augustine (grade I) with its early 18th century brick west tower stands in a large churchyard with a terrace of six houses, numbers 2-12 Gildencroft.

**Magdalen Street** runs along the eastern side of the application site, between Magpie Road and the Wensum, and is divided by the inner ring road overpass. In the southern part there are continuous historic buildings built close to the roadside dating from the 16th to 19th centuries. The northern part of the street has seen more modern development, but there are several buildings with 17th century work behind 18th and 19th century frontages. Some modern building is unsympathetic to this character, including Anglia Square itself, but much of it at least conforms to the height of historic building in the street.

Around St Augustine's Street and Magdalen Street are 19th century terraces of housing on **Sussex Street, Esdelle Street and Leonard Street, Cowgate, Bull Close, Willis Street and Peacock Street**. These have a modest, intimate character typical of the building type and period.

Parts of **Norwich city wall** remain standing on the northern edge of the conservation area, including a tall section on Magpie Road and smaller but longer parts set in a broad open area on Bakers Road (both are scheduled). Most of the wall along Magpie Road has been removed but Victorian terraced housing reflects its line and defines the edge of the conservation area. From these streets there is little large-scale modern development prominent in views of the walls, but some modest brick-built housing on Bakers Street which, like the Victorian terraces reinforces the former presence of the wall in a positive way.

Beyond the historic city **Waterloo Park**, a designed park of 1931-3 (registered at grade II\*), is set amongst contemporary housing development on its east and west sides, but the playing fields of an adjacent school have maintained an open aspect to the south beyond the boundary planting and with it a relationship with the city centre. At the top of the Wensum valley is **Catton Park**, the first commission for the celebrated garden designer Humphry Repton in 1788, now registered at grade II\*. The park had a deliberate relationship with the city below and the spire of the Anglican cathedral in particular. A belt of later planting screens the park from the modern outer ring road but the visual impact of features in the city beyond it remains important.

#### **4. Impact of the Proposed Development**

The aspect of the development's impact with which Historic England are principally concerned is its visual impact on Norwich, and the effect of this on the significance of the city and of its monuments, buildings and spaces, and on their appreciation. While the revised and new images produced to illustrate the visibility of the proposed development from various vantage points are helpful in indicating its possible impact we note that such images cannot be more than aides to assessment. Although produced to accepted professional standards, such images do not fully reproduce the effect of how a viewer might see a scene. We have reviewed the images on site and consider that in many instances the presence of the proposed development

would be more pronounced than the images suggest. This should be borne in mind when considering the visual impact on the appearance and character of the city.

Such is the scale of the proposed development that it would become a prominent feature in general views across the city. In views from St James' Hill on Mousehold Heath and from Kett's Heights the proposed tower and the bulk of the greater part of the development would be seen in combination with the **major landmarks** in the south of the city, including the castle, city hall, St Peter Mancroft and St Giles' churches and the Anglican and Catholic cathedrals (images 8 and 9). Despite the elevated position of several of these buildings, and the height of the Anglican cathedral, the development would appear as a competing, distracting and discordant landmark. These elevated vantage points are locations from which the Anglican cathedral with its grand 14th century spire is seen to best effect and from where the early form of the building can be appreciated. The proposed tower would detract from an appreciation of the cathedral in these views. The development would detract from an appreciation of Norwich's greatest historic buildings, and from the historic city as a whole in a way that other modern buildings do not.

From the **castle** mound and battlements the extent of the north side of the Wensum valley can be seen, as can the partly wooded ridge enclosing the valley. The development would be a prominent feature in these views, with the tower even at its reduced height exceeding any historic or modern building and compromising an appreciation of the relationship between the castle, the city and the landscape (image 12). Other substantial parts of the development would also be prominent in these views, blocking views of the ridge beyond the city.

Little of the modern building beyond the northern side of the **market place** disrupts the character and grain of the cityscape due to the falling ground level towards the Wensum. The proposed tower would appear above the roof of the Guildhall in a view flanked by the market place, St Peter Mancroft and City Hall (image 11). It would also be visible from the first floor balcony of the City Hall (image 53). The tower would form an element at odds with the character of this side of the space, and with it a measure of harm to historic significance. The views from City Hall reflect the building's physical and symbolic position overlooking the heart of Norwich.

The cathedral close is vital to Norwich's exceptional character and significance. In its original iteration the proposed tower would have been visible from the Upper Close, disrupting its remarkably uncompromised architectural and historic character. With the reduction in the height of the tower that would no longer be the case. Instead, however, it is now clear that the tower would be visible and prominent in the majestic views of the cathedral obtained from the Lower Close. Here one can appreciate the exceptional architectural character of what is one of the finest Romanesque buildings in Europe and one of England's great cathedrals, in a setting at once pastoral – characteristic of the more generous cathedral closes – and part of the historic city. New photomontages show that these views would be compromised by the appearance of the tower – unsurprisingly as the top of the existing Sovereign House is itself visible (although not prominent) in certain views. The view from the Lower Close is one of those in which we think it likely that the impact of the tower would be felt far more strongly than the image suggests. The presence of the proposed tower in this classic view of the cathedral would compromise both its

beauty and its historic character. In doing so it would mar the appreciation of one of Norwich's outstanding experiences by both citizens and tourists alike. (The relevant photomontages are images 20, 21 and 60.)

Bishopsgate is an important medieval road into the city, leading from the 14th century Bishop's Bridge (scheduled) and passing the Great Hospital, including St Helen's church, the hospital cloister, hall and master's house (all listed at grade I) and other historic buildings including almshouses. It has now been demonstrated that in views from the Bishop's Bridge the development would be hidden by existing buildings (image 59), but we remain concerned that it might be visible from, and compromise the character of, the Great Hospital.

As we previously noted, the existing buildings at Anglia Square can be seen from the first floor of St Helen's House in the historic Great Hospital; and it therefore seems possible that the proposed development could be seen from open spaces around the Hospital complex. Were this to be the case, the development would detract from the harmonious grouping of buildings and the sense of seclusion which give the grounds of the Hospital their particular character, and so from an appreciation of this remarkable historic complex and its significance.

The information produced to date does not contradict this supposition. Although the development might be hidden by buildings in views from a courtyard adjacent to the chancel of St Helen's church and the Great Hospital's medieval cloister and from a location south of St Helen's House (images 57 and 58) it is not certain that it would not be visible from the north side of St Helen's House. It is surprising that in an image, shown to us informally and taken from here, the tower would be amongst trees. It would be helpful were a verified view to be submitted.

**Tombland, Wensum Street and Fye Bridge Street** share a dense pattern of historic buildings, varied in style but with considerable commonalities of scale and traditional materials. Tombland, in origin the Saxon marketplace, forms the setting for the Erpingham Gate to the Cathedral Close, and is undisturbed by any discordant development. The proposed tower would be visible from within Tombland where Wensum Street joins the plain (image 23), and would be quite at odds with the space's historic character. Wensum Street is one of the city's principal thoroughfares, and its historic character is similarly uncompromised as it descends from Tombland towards the river. The tower would be highly prominent looking down Wensum Street towards the bridge – and indeed would be placed so as to catch and hold the eye (image 25). From Fye Bridge itself the tower would rise above the consistent historic streetscape of Magdalen Street (image 53, revised from the initial submission, is taken from a more appropriate vantage point than the original).

Another area with a streetscape of traditional character and great historic value adjoining Wensum Street is Elm Hill – indeed, the picturesque qualities of the street are widely celebrated. Elm Hill's consistent historic character is complemented by the scale and form of buildings at Friar's Quay across the river. In its reduced form the proposed tower would be less visible than the initial proposal would have been, but it would be glimpsed from Elm Hill and from the churchyard of St Peter Hungate (image 55). In these exceptionally characterful and undisturbed historic enclaves even glimpses of the tower would detract from their special character. This prompts a

general observation: it is difficult to predict where glimpses of the tower might be found, and the historic core of Norwich contains a number of sensitive locations whose character could be adversely affected by even partial views.

**Colegate** is lined with buildings of great historic and architectural value and St George's and Calvert Streets, with small-scale red brick housing, some historic and some suitably scaled modern additions, lead from it. The sensitivity of this area is such that even glimpses of the tower, alien in its form, scale and design, would detract from its character. Despite the reduction in the height of the tower, the proposed development would be visible from **St George's Street and Calvert Street** intensifying the impact of existing modern development in views down these streets, harming the significance of this part of the conservation area and that of the listed buildings. The development would also be visible from Doughty's Hospital, a complex of 19th century almshouses listed at grade II, and the height and massing of the proposed development would exacerbate the harmful impact of the existing modern development to the north of the Hospital courtyard. The reduced height of the tower does not appear to make any material difference to this impact (image 44).

**St. Augustine's Street** is lined with historic buildings, several concealing 15th-17th century structures behind later facades. Several are listed. The parish church of St Augustine (listed grade I), with its early 18th century brick west tower, stands in a large churchyard, with a terrace of six houses, numbers 2-12 Gildencroft, at the southern end of the street. The proposed development would dominate all this. The residential tower would rise above the hitherto consistent roofline of St Augustine's Street while the bulk of the proposed development would greatly exacerbate the already harmful effect of the existing buildings of Anglia Square (images 15 and 16). The reduced tower and the revised development overall would still be an overwhelming presence in views of and from St Augustine's Church and the adjacent cottages. A substantial block of building would face the church and cottages and the proposed tower would dominate their setting, resulting in marked harm to their historic significance (images 32 and 33).

In the southern part of **Magdalen Street** there are continuous historic buildings close to the roadside, consistent in form and scale. Unsurprisingly, the proposed development would have a much more intense impact than the existing buildings of Anglia Square (image 42). The reduction in height of the tower is unlikely to diminish this impact materially.

Around Magdalen and St Augustine's Streets are the 19th century terraces of housing on Sussex Street, Esdelle Street and Leonard Street, Cowgate, Bull Close, Willis Street and Peacock Street. These have a modest, intimate character typical of the building type and period. Although the bulk of development would be hidden by the buildings of the southern side of Sussex Street, the tower might still be visible across the open ground at the western end of the street (image 51). At the end of Cowgate Street the development would intensify the presence of large modern building out of scale with the historic buildings (image 35). As Sovereign House can already be seen on Leonards Street we consider that the proposed tower would be visible here and could also affect views from Esdelle Street. No images have been produced to corroborate or contradict this judgement, despite requests.

The proposed tower would rise above the section of scheduled **city wall** by the junction of Magpie Road and St Augustine's Street, despite the reduction in its height, in a place where no other building breaks the skyline above the wall. The appearance of the tower would detract from an appreciation of the wall as an enclosing, defensive boundary. The proposed tower could also intrude into views of the former line of the wall and the conservation area boundary which follows it along Magpie Road, where it is defined in a positive manner by terraced housing, potentially resulting in harm to the significance of the conservation area. In our previous advice we suggested an image of the view from further along Magpie Road where the ground level opposite the Victorian terraces continues to rise on Starling and Heath Roads could confirm if there would be such an affect; but this has not been produced.

Relatively little of the building beyond **Waterloo Park** is visible from inside it because of trees, but the spire of the Anglican cathedral stands out, its presence emphasised by what appears to be a managed break in the trees. The proposed tower would be visible, especially in winter when the leaves have fallen (image 48). Almost the height of the spire and greater in bulk, the tower might not simply rival the spire but could prove the more prominent 'eye-catcher' in this view, detracting from the experience of being in the park.

Also beyond the historic city is **Catton Park**, Humphry Repton's first landscape. Repton framed a view towards the spire of the cathedral, which survives. A belt of later planting screens the park from the modern outer ring road but the visual impact of features in the city beyond it remains important. When experienced in person, the view to the cathedral is a more important feature than the original image submitted seemed to suggest (image 1). Although revised images suggest that the proposed tower, and the accompanying development, would be screened by the planting along the southern edge of the park (images 61 and 62) it remains possible that the development would be visible in winter, to the detriment of the designed aesthetic character of the park

Historic England advise your Council that the impact of the proposed development would remain severe notwithstanding the revisions to the scheme since its first submission. The proposed development would continue to be of a scale and character alien to Norwich's historic character. The development as a whole would be at odds with the historic grain of the cityscape, while the tower would still rise within the northern quarter of the medieval city to vie with the great historic landmarks of the city – the castle, the two cathedrals and City Hall, St. Peter Mancroft and St. Giles. The reduced scheme would be no longer be visible in some views, some of them important, but the reduction would make no material difference to the nature of its effect on Norwich. When its impacts are taken together, we consider that the proposed development would profoundly harm the character of the historic city. It would mar the richness and coherence of the cityscape, and its form and character would be radically at odds with the city's historic topography, character and grain.



## **5. Legislation, National and Local Policy and Guidance**

### **Legislation, National Policy and Guidance**

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affects a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (section 66 (1)). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (section 72). In this case several of the buildings affected by the proposed development are listed at grade I and II\* and so fall within the most important 5.5% of listed buildings nationally, while the conservation area which encompasses Norwich's medieval limits is itself one of exceptional significance, making adherence to these statutory duties especially critical in the determination of this application.

The National Planning Policy Framework ("The Framework" or "NPPF") states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (NPPF, 7 and 8). Heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations (NPPF, 184).

The Framework requires local plans to contain a positive strategy for the conservation and enjoyment of the historic environment (NPPF, 185). Such strategies should take account of the desirability of sustaining and enhancing the significance of heritage assets; the wider social, cultural and economic benefits that the conservation of the historic environment can bring; the desirability of new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.

The Framework enjoins local planning authorities to take account of similar considerations when determining applications, namely the desirability of sustaining and enhancing the significance of heritage assets; the positive contribution that the conservation of heritage assets can make to sustainable communities, including to their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness (NPPF, 192).

When considering the impact of a proposed development on the significance of designated heritage assets the Framework requires local planning authorities to give great weight to the asset's conservation, and that weight should be proportionate to the asset's significance (NPPF, 193). The more important the asset, the greater the weight accorded its conservation should be.

The Framework distinguishes between "substantial harm" to designated heritage assets, an exceptional phenomenon, and harm which by opposition is characterised as "less than substantial" (NPPF, 194-196). Harm may be caused by alteration or destruction, or by development within the setting of an asset. "Less than substantial

harm” is a term encompassing a broad range of harm from a high level to a low. Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (NPPF, 196).

The Framework states that that good design is a key aspect of sustainable development, helping to create better places in which to live and work and to make development acceptable to communities (NPPF, 124). It requires that planning policy and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities) (NPPF, 127).

Historic Environment Good Practice in Planning Advice Note 3, The Setting of Heritage Assets (2nd edition, 2017), provides guidance to help understand and apply law and policy in respect of setting. While in this case the impact of the proposed development is perhaps most readily understood as an impact on the character of Norwich as a historic place, it may also be understood as an impact upon the setting of the various designated heritage assets to which reference is made here (as well as an impact of that of undesignated heritage assets). The advice note’s guidance is therefore relevant.

## **Local Policy**

The positive strategy for the historic environment which the Framework requires local planning authorities to adopt can be found threaded through the local plan. Its broadest expression is in the statement of the vision and overall objectives for the plan. The latter include the protection and enhancement of the individual character and culture of the area, and the protection, management and enhancement of the natural, built and historic environment (objectives 8 and 9).

Anglia Square is not specifically identified in Norwich City Council’s Adopted Local Plan (2014) but there are a number of policies in the Development Management Policies Document which guide development in the historic city. Policy DM1 (‘Sustainable Development Principles for Norwich’) states that ‘...development proposals will be expected...to...protect and enhance the ...heritage assets of the city and to safeguard the special visual and environmental qualities of Norwich...’ Policy DM3 (c) states that ‘significant weight will be given to the following design principles in assessing development proposals. Proposals should respect, enhance and respond to the character and local distinctiveness of the area. The design of all development must have regard to the character of the surrounding neighbourhood and the elements contributing to its overall sense of place, giving significant weight to the uses and activities around it, the historic context of the site, historic street patterns, plot boundaries, block sizes, height and materials.’ DM9 (‘Safeguarding Norwich’s Heritage’) states that ‘all development must have regard to the historic environment and take account of the contribution heritage assets make to the character of an area and its sense of place. Development shall maximise opportunities to preserve, enhance, or better reveal the significance of designated heritage assets...’. The Supplementary Text appended to the Plan (paragraph 9.3) reinforces this by stating that ‘all opportunities to protect, conserve or better reveal

the significance of nationally designated assets should be taken in new development.’

Anglia Square was allocated for mixed use development in the 2004 Replacement Local Plan and subsequently in the Northern City Centre Area Action Plan (2010). This Action Plan expired in March 2016 and a site specific Planning Policy Guidance Note for Anglia Square was issued by Norwich City Council in March 2017. In the absence of an adopted Supplementary Planning Document or site allocation in an Adopted Local Plan, the Policy Guidance Note is the only current Council planning policy document that specifically relates to the redevelopment of Anglia Square.

The Anglia Square Policy Guidance Note was produced in response to the particular form and nature of the present development proposals, rather than being a comprehensive options appraisal for the development of the site. It makes some general observations regarding the way development should respond to the conservation area and setting of nearby designated heritage assets but does not draw explicit conclusions about the scale of new development.

Paragraph 3.18 of the Guidance Note states that “the height and traditional character of buildings and streets to the north and east of the site, (most immediately Magdalen Street, St Augustine’s Street and Gildencroft), needs to be respected in the redevelopment to ensure the buildings, streets and their settings are not unduly dominated or harmed by the new buildings.” It goes on to say (paragraph 3.23) “the buildings surrounding the site (other than the office buildings immediately bordering the site to the south) are of a traditional character forming terraced streets of two to three storeys in height, with new four storey flats opposite Edward Street. The relationship between the buildings on St Augustine’s Street and Gildencroft, including St Augustine’s Church, needs to be carefully considered so that their setting is respected in any redevelopment”.

The Guidance Note does not consider the possible visual impact on the historic cityscape of Norwich as whole, but does comment on some specific views. Paragraph 7.88 notes that ‘the redevelopment of Anglia Square offers opportunities to reinstate and improve views from the north of the site to major city landmarks, including the Anglican cathedral.’ However, paragraph 7.87 says that ‘a future planning application would need to address how the proposals can successfully integrate and improve upon the existing townscape character’ and there is a general statement on the setting of heritage assets (paragraph 7.90): ‘new development should be sensitive to the scale of existing buildings in its vicinity and must respect the setting of historic assets.’ It is stated (paragraph 7.91) that ‘there may be scope to provide a landmark building within the site...[but] a landmark building does not necessarily need to be a landmark as a result of its height and particular attention must be paid to such proposals in view of the highly sensitive townscape of the St Augustine’s Street area...’

An additional document which relates to the application site is the Norwich Conservation Area Appraisal (Anglia Square Character Area). This also contains management policies which include respecting the scale of existing development where new development meets it along Magdalen Street (policies D1, D3, E4).

## 6. Historic England's Position

Historic England consider that the proposed redevelopment of Anglia Square would have an extensive and severe impact on the character and significance of Norwich as an historic place, on the significance of the city's greatest historic buildings and on that of many others, on the significance of important parts of the Norwich city centre conservation area and on that of historic parks beyond it, and on people's appreciation of that significance. This was our conclusion in response to the first iteration of the proposals, and having considered the revised plans, images and other details provided in support of the amended scheme we do not consider that the amendments would materially reduce the overall impact of the scheme.

The harm to Norwich's significance and to that of the significance of the many monuments, buildings, spaces and landscapes which we have identified above, would be caused essentially by the visual presence of the development in the cityscape. This harm would follow from the nature of the development, and can be restated in summary by considering both setting and character.

In respect of setting, many of the attributes of setting which the advice note suggests may contribute to the significance of a place or building are relevant, as are many of the elements of a development which it suggests might help elucidate the impact of that development (GPA 3, "Step Two" checklist, page 11, and "Step Three" checklist, page 13).

Norwich's topography means that the great royal and civic buildings – the castle and Civic Hall – overlook and dominate the city, while the scale of the cathedral in the river valley, and the great height of its spire, mean that it rises to join them in articulating and lending form to the cityscape. All this can be seen most vividly from Mousehold Heath. Although complex and continually changing, Norwich's cityscape retains the distinctive character common to many historic towns and cities (or at least those which have not undergone extensive, large-scale modern development), in which civic and religious buildings lend dignity and identity to the broader town or cityscape. As so often in such places, this is achieved in part by the scale of those buildings themselves, but equally by the landmarks which their towers, campaniles and spires create – all structures whose purpose is essentially symbolic. This historic character survives strongly in Norwich, despite its gradual erosion by the pressures of recent development. Then there is the scale and grain of the broader townscape. Norwich's great monuments articulate an exceptionally rich network of spaces and streets, some shaped by the Saxon and Norman development of the city, framed by historic buildings remarkable for their number and quality. The pattern of spaces, streets and buildings, and the scale and grain of the latter, all combine to create a remarkable ensemble. In all these ways, aspects of setting contribute to the significance not only of particular buildings – great or modest – but to the extraordinary significance of the whole.

The attributes of setting which contribute to this significance are those which the proposed redevelopment of Anglia Square would damage. From Mousehold Heath the particular relationship between Norwich's historic landmarks and the wider cityscape would be severely compromised by the intrusion of the bulk of the major part of the proposed development, and the bulk and height of the proposed tower.

The presence of the development would erode, and arguably destroy, the historic character which the city derives from the continued dominance of its great civic and religious buildings. The coherence of the exceptional ensemble of historic spaces, streets and buildings which makes up the historic cityscape of Norwich would be severely damaged by the presence of the proposed development, overwhelming in its impact on those parts of the city closest to it, but harmful to the city as a whole. The cumulative impact of the development, seen across the city, from places of exceptional importance such as the terrace on the castle's motte – or from its battlements, now to be opened to the public – and the Lower Close, but also from a host of other places, among them great spaces such as Tombland, major thoroughfares such as Wensum Street and Magdalen Street, and a host of lesser vantage points, such as Colegate or the courtyard of Doughty's Hospital, would be such as to cause profound harm to the character of the city.

This analysis has been framed with reference to the guidance in respect of setting, but as the conclusion of the previous paragraph suggests, in practice considerations of setting and character are closely intertwined in considering the impact of the proposed redevelopment of Anglia Square.

Given Historic England's assessment of the harm to designated heritage assets which this scheme would cause, the proposals would be contrary to the Framework's emphasis on the irreplaceable nature of heritage assets and its policy seeking their conservation in a manner appropriate to their significance (NPPF, 184).

The Framework enjoins local planning authorities, when determining applications, to consider the desirability of sustaining and enhancing the significance of heritage assets, the positive contribution such assets can make to sustainable communities, including to their economic vitality and the desirability of such development making a positive contribution to local character and distinctiveness (NPPF, 192). The proposed development would harm the significance of designated heritage assets, would compromise the qualities which make historic Norwich so attractive a place for people to live, would compromise the qualities which contribute to its economic vitality – both in respect of tourism but also in respect of other sectors of economic activity known to thrive in historic places, and would profoundly harm, rather than contribute to, local distinctiveness.

The Framework requires great weight to be given to the conservation of designated heritage assets by local authorities determining applications, and that weight should be proportionate to the asset's significance (NPPF, 193). The range of designated heritage assets whose significance would be harmed by the proposed development is very large, and it includes, in the major historic buildings of the city and in the historic city as an entity, designated heritage assets of exceptional importance, of European as well as national significance. Many of the buildings whose significance would be harmed by the proposed development are listed at high grades, and therefore among the most important 5.5% of listed buildings, and some are of European importance. It follows that the weight to be accorded by the council to their conservation should be very, very high.

Any harm to such assets should require clear and convincing justification (NPPF, 194). Given the severity of the harm the proposed development would do to so large

and in some cases so significant a set of designated heritage assets, such justification should be compelling. In essence, the applicants argue that their scheme is justified because it provides the only means by which the existing buildings of Anglia Square could be demolished and the site redeveloped, with all the benefits that such redevelopment would bring.

While Historic England have not independently assessed the financial justification for the proposed development we question whether it provides such clear and compelling justification. The relevant supporting statement (Planning Viability Report by Icen dated September 2018) deals with the quantum of housing but does not demonstrate that the same quantum of development could not be achieved by displacing the accommodation within the 20 storey tower – something which would certainly reduce the harm which the proposed scheme would cause, although it would by no means eliminate it. Equally we are not persuaded that it has been established that a fundamentally different approach to the development, and a different approach to the deployment of public funding, could not provide for a scheme which would either complement or be less at odds with the grain and character of Norwich's cityscape and the topography of the city. Finally we note that although the existing buildings of Anglia Square are unsightly and in part not fit for use, the development as a whole continues to serve some economic and social purpose, and the existing buildings, although discordant in their immediate setting, cause much less harm to the wider cityscape than would the proposed scheme. Given these considerations it is not evident that there is clear and compelling justification for the harm that the proposed development would cause.

Finally the Framework requires that should proposals for development entail harm to designated heritage assets this harm should be weighed against such public benefits as the development would provide (NPPF, 196). We shall turn to this balance after first noting the relevance of the Framework's policies on design and then considering the local policies pertaining to the conservation of the historic environment.

The Framework provides broad policies about design, which are generally pertinent to consideration of this application (NPPF, section 12). One of their provisions is that both planning policies and the determination of applications should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities) (NPPF, 127). The proposed development would not be sympathetic to local character or to the surrounding built environment.

The positive strategy for the conservation and enjoyment of the historic environment, which the Framework requires local planning authorities to adopt, is to be found threaded through the local plan. It is evident, for example, in the vision and overall objectives for the plan, which include an objective to protect and enhance the individual character and culture of the area and an objective to protect, manage and enhance the natural, built and historic environment (objectives 8 and 9). Given the harm that the proposed redevelopment of Anglia Square would cause to Norwich's historic character and significance, and to that of the particular buildings, streets, spaces and landscapes considered here, this scheme must be considered to be fundamentally at odds with any positive strategy for the historic environment.

The proposed development similarly fails to meet the objectives of the relevant development management policies for the historic environment. The local plan expects proposals “to protect and enhance the physical, environmental and heritage assets of the city and to safeguard the special visual and environmental qualities of Norwich for all users” (DM1). The proposed development would do the opposite. The plan expects proposals to respect, enhance and respond to the character and local distinctiveness of the area (DM 3). The proposed development would be harmful to the character and distinctiveness of the city; and such benefit which might be achieved by the reinstatement of something of the original pattern of streets on the site itself would be overwhelmed by the scale of the development lining them, even before considering the wider effects of the scheme.

The Anglia Square Policy Guidance Note provides some guidance in respect of the impact of any development on the environs of Anglia Square, referring to the importance of respecting the height and traditional character of adjacent streets and to the relationship of any development to St. Augustine’s Street (paragraphs 3.18 and 3.23). Although a small part of the development on Edward Street might complement the scale of the adjacent streetscape, the scale of the development as a whole and that of the tower in particular would be wholly at odds with the neighbouring buildings and streets. The existing buildings of Anglia Square pay little heed to their neighbours’ scale and character: those that are proposed would pay less. The guidance does encourage consideration of how the redevelopment of Anglia Square might enable the creation of a view to the city’s major monuments, and to the Anglican cathedral in particular (paragraph 7.88). The proposed scheme does provide for such a view, as part of its reinstatement of something of the historic streetscape. It is notable that the note contains no more general provisions about the relationship between any redevelopment and the cityscape as a whole; and it is difficult to consider the creation of one view of the cathedral from within the development as providing a benefit in any way comparable to the harm that would flow from the proposed redevelopment as a whole.

While it is common for national and local planning policies relevant to different subjects to be in tension, the Anglia Square Policy Guidance Note seems to us to raise exceptional questions. Much of what the proposed development would provide is consistent with the note’s guidance, but it could only be provided by ignoring the note’s guidance about the relationship between the proposed development and the adjacent areas of the city. Nothing in the note suggests that the City Council, in producing the note, anticipated that any development which met its several functional objectives would be of such scale as not only to dominate its immediate surroundings but also radically to undermine the application to Norwich of all national and local policies for the protection and enhancement of the historic environment.

As stated above, the Framework requires the Council to weigh the public benefit arising from the proposed development against the harm to the historic environment (and against any other detrimental effects relating to other areas of policy) (NPPF, 196). Historic England consider such of those benefits as might be thought heritage benefits would be greatly outweighed by the harm which the proposed scheme would cause to Norwich’s significance. It is for the City Council to undertake the overall planning balance, and we do not comment on the weight to be accorded to

other public benefits arising from the scheme. Historic England do, however, remind the council of the very great weight which should be accorded to the conservation of the designated heritage assets whose significance would be harmed in this case, and of the statutory duties relating to the determination of applications affecting listed buildings and conservation areas.

We also note that in articulating the nature of sustainable development, the Framework states, 'achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)' (NPPF, 8). One of these objectives is to contribute to protecting and enhancing our historic environment. Given the severity of the harm which the proposed development would cause to Norwich's historic significance, it is very clear that in this case the scheme before your council fails emphatically to meet this aspiration.

We are aware that an alternative approach to the redevelopment of Anglia Square has been put forwards by the Cathedral, Magdalen and St Augustine's Forum, a local group. This approach has been informed by public consultation and seeks to respond to the needs and concerns of the local community. Although the Forum's approach is only presented by simple, indicative plans, Historic England consider that it offers the prospect of realising the Framework's vision of sustainable development encompassing economic, social and environmental benefits in a way in which the proposed development could not. Certainly it offers the prospect of realising the opportunity that the redevelopment of Anglia Square presents to enhance its environs, and the perhaps the wider cityscape, rather than severely harming them. This would be, potentially, the sort of scheme consistent with the aspirations and requirements of local and national policy which it would be eminently appropriate to support with the substantial levels of public funding upon which the proposals set out in the current planning application would depend

Historic England strongly object to the granting of permission on the grounds of the harm the proposed development would cause to Norwich's historic character and to the significance of designated heritage assets, as described above. We would very much welcome the opportunity to engage with the Council, the community and the applicants to consider a revised approach to Anglia Square which would secure the site's redevelopment in a manner in accord with the character of Norwich. If the Council are minded to grant permission for the current proposals we will refer the case to the National Planning Casework Unit and ask that it be called in for determination by the Secretary of State in view of the exceptional nature and national importance of the questions to which the proposals give rise.

## **Recommendation**

Historic England strongly object to the application on heritage grounds and recommend that the City Council should refuse to grant planning permission. Despite the reduction in the height of the proposed tower the development would result in severe harm to Norwich's historic character, to the historic significance of the Norwich city centre conservation area as a whole, to several important spaces within



it and to numerous scheduled monuments, listed buildings and registered historic parks, many of them designated at a high grade and some of European significance.

We consider that the application does not meet the requirements of the Framework, and note in particular both that the Framework requires that economic, social and environmental gains should be pursued in mutually supportive ways through the planning system, and that the great weight it accords to the conservation of designated heritage assets should be greater the more important the asset or assets (paragraphs 8 and 193). In this case, the proposed development would cause severe harm to the historic environment, while the importance of the designated heritage assets whose significance would be harmed by the development rather than conserved could scarcely be greater.

In determining this application your Council should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the buildings or its setting or any features of special architectural or historic interest which it possesses and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form and are minded to grant consent we will refer the case to the National Planning Casework Unit and request it to be called in for determination by the Secretary of State. Please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely



David Eve  
Inspector of Historic Buildings and Areas  
e-mail: david.eve@historicengland.org.uk

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**From:** Neale, John  
**Sent:** 23 November 2018 11:29  
**To:** pcu@communities.gov.uk  
**Cc:** gerry.carpenter@communities.gov.uk  
**Subject:** Anglia Square, Norwich – application  
**Attachments:** 2018 10 30 – Norwich – Anglia Square

Dear Sir / Madam,

I write to ask, on behalf of Historic England, that the Secretary of State call in the current planning application for the redevelopment of Anglia Square in Norwich, should Norwich City Council be minded to grant planning permission. The application is number 18/00330/F.

Historic England consider that the proposed redevelopment of Anglia Square would cause severe harm to the character and significance of Norwich, one of England's great historic cities. The scale of the development would be such as to detract from the character of the historic city – designated as a conservation area – and from the significance of the medieval Anglican cathedral and castle, both buildings of European importance, from that of the 19<sup>th</sup> century Roman Catholic cathedral and the 20<sup>th</sup> century City Hall, both highly graded listed buildings, and from that of many of the historic spaces and buildings which together create the city's exceptional character. The harmful nature of what is proposed raises fundamental questions about how to approach development in Norwich so as to secure the city's historic character as something worthy of conservation and as something central to the city's contemporary vitality.

I attach our letter of advice to Norwich City Council, in which this analysis is developed and set in the context of national and local planning policy.

Historic England request that this application be called in for the Secretary of State's determination as we believe that it raises questions of national importance which fall within the published criteria for calling in planning applications. Firstly we consider the proposals to be inconsistent with the objective of promoting sustainable development which lies at the heart of the National Planning Policy Framework, and thus to be in conflict with national policy. Secondly, we believe that the architectural and urban design issues to which the proposals give rise are of national significance.

Should the application be called in Historic England would wish to appear at any public inquiry as a rule 6 party

We understand that the application will be considered by Norwich City Council's Planning Committee on Thursday 6 December.

Yours faithfully,

John Neale

John Neale MA IHBC  
Planning Director - East of England  
Planning Group

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Historic England

Mr Gerry Carpenter  
National Planning Casework Unit  
Ministry of Housing, Communities &  
& Local Government  
5 St Philips Place  
Colmore Row  
Birmingham B3 2PW

Direct Dial: 01223 582721

Our ref: P00848070

7 December 2018

Dear Mr Carpenter

**Re: Planning Application 18/00330/F Anglia Square including Land and Buildings to the North and West, Norwich, Norfolk**

I am writing in light of the decision by Norwich City Council on 6 December 2018 to resolve to approve the above application, and further to Mr Neale's email of 23 November 2018, to confirm our request that this application be called in for the Secretary of State's determination.

Historic England were consulted on this application by Norwich City Council in March 2018. We identified severe harm to the historic character and significance of Norwich - designated as a conservation area - , to several important spaces within it and to numerous scheduled monuments, listed buildings and registered parks, many of them designated at a high grade.

Historic England objected strongly to the proposals and we were not convinced that serious attempts to avoid or minimise harm to these highly designated heritage assets have been made. We attach for ease of reference our consultation letters of 16 May and 30<sup>th</sup> October 2018. In these letters we advised the City Council that in the event of their being minded to approve the application we would request it be called in by the Secretary of State for Communities and Local Government for his consideration.



Historic England, Brooklands, 24 Brooklands Avenue, Cambridge CB2 8BU  
Telephone 01223 58 2749 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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We note from the recommendation in the planning committee report that the approval is subject to the outcome of a referral to the National Casework Planning Unit and we understand that the application will be referred to you by the Council in due course.

We are particularly concerned about this case for a number of reasons. The proposal would have an impact on numerous highly graded national heritage assets including the Grade I listed Norwich castle and Anglican cathedral. As part of its harmful impact on the character of the historic cityscape as a whole it would affect the group of highly designated landmark buildings in the southern part of the historic city including the Roman Catholic cathedral, city hall and historic landmark churches St Peter Mancroft and St Giles which together form a highly important element of the city's historic character. Although the proposals have been modified since the application was first submitted this modification did not address the clear heritage concerns raised and we therefore maintained our objection as the proposal will have a harmful impact on the heritage assets.

Above all, however, the harmful nature of what is proposed raises fundamental questions about how to approach development in Norwich so as to secure the city's historic character as something worthy of conservation and as something central to the city's contemporary vitality.

Having regard to the Secretary of State's policy for calling in applications for his own determination, we consider that the application conflicts with national policies on important matters. Following the recent publication of the revised NPPF, the Government has made it clear that it recognises the importance of the historic environment and has no intention to reduce, whether through the Framework or otherwise, the important protections that exist for it. This proposal does not, in our view, comply with the requirements of the Framework in avoiding or minimising harm to these national heritage assets and does not contribute to the achievement of sustainable development.

The application also raises significant architectural and urban design issues. The density of the proposed development and the scale and massing of the built elements within it do not respond to the nature of historic development within the city as a whole and the immediate setting of the development site. While we would accept that building of some scale and a contemporary style could be appropriate for the Anglia Square site we consider the proposed scheme would not deliver sustainable development of a scale and quality suitable for the historic cityscape of Norwich.

In light of the major concerns the proposed development raises, the conflict with national policies and the significant architectural and urban design issues we request that the Secretary of State uses his power to call in this planning application for his own determination.



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Should you require any further information, please do not hesitate to contact us

Yours sincerely



David Eve

Inspector of Historic Buildings and Areas  
e-mail: [david.eve@historicengland.org.uk](mailto:david.eve@historicengland.org.uk)



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