

SUMMARY OF PROOF OF EVIDENCE

ALEC FORSHAW, ON BEHALF OF SAVE BRITAIN'S HERITAGE

ANGLIA SQUARE, NORWICH NR3 1DZ

APPLICATION REF: 18/00330/F

APPEAL REF: APP/G2625/V/19/3225505

1. I set out a brief description of the development and the site.
2. I set out the relevant policy framework and guidance.
3. I assess the significance of the designated and non-designated heritage assets that are potentially affected by the development proposals, including the Norwich City Centre Conservation Area, the Anglican cathedral and various other listed and locally-listed buildings close to the site. I compare Norwich to other medieval cathedral cities.
4. I assess the impact of the proposed development on the significance of the heritage assets, including long, medium and close range views. This includes the impact of the proposed tower but also the other blocks that form part of the scheme. I conclude that the degree of harm is very severe, amounting to substantial harm.
5. I evaluate the scheme against the criteria of achieving well-designed places.
6. I consider the scheme in terms of compliance with local policy and guidance.
7. In undertaking an exercise of balancing harm against public benefit I assess the public benefits that are claimed by the applicant, including heritage benefits, provision of housing, retail, leisure and office accommodation, and public realm. I conclude that the level of public benefit is modest, and does not outweigh the degree of harm to heritage assets caused by the proposals.
8. I outline alternative visions or scenarios for the site, including that put forward by Historic England, and the recently-completed Goldsmith Street development nearby, and discuss their merits.
9. I discuss the importance of the decision over the development of Anglia Square in terms of the future vision for central Norwich as a creative, artistic and cultural hub and an eco-quarter for the 21st century. I refer to the *Cathedral Cities in Peril* report, and the 2040 vision for Norwich.
10. I consider the issues of optimum viable use and deliverability, including the matter of subsidy offered to the proposed development.
11. I conclude that the proposals cause very serious harm to designated heritage assets of the very highest significance. I consider that the Council has undervalued both the importance of these heritage assets and the degree of harm that the proposals cause, and has overvalued the public benefits that it believes the scheme creates. I believe that equivalent or greater public benefits could be achieved by an alternative scheme that does less harm and which more effectively preserves and enhances heritage assets. I request that the scheme be refused planning permission.