



THE
NORWICH
SOCIETY

Reference: NS1

**Planning Application 18/00330/F
PINS reference
PCY/RTI/G2625/3216532
Land at Anglia Square, Norwich**

Proof of evidence: Jon Boon RIBA

I am a Trustee of the Norwich Society, and chair their Planning Appraisal Committee (PAC). As a chartered architect I have worked in private practice for over 40 years. I was senior architectural partner at Ingleton Wood, a regional multi-disciplinary practice of over 100 staff with offices in London, Norwich and throughout East Anglia. My work has principally been in the residential sector, particularly affordable housing and large-scale estate development, where I have also acted as Building for Life and HQI (Housing Quality Indicators) assessor. I specialise in sustainable design, including passivHaus developments, and have been an accredited assessor for BREEAM and Code for Sustainable Homes. I am a previous President of the Norfolk Association of Architects.

Proof of Evidence

This proof of evidence addresses the Secretary of State's fourth issue:

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

Generally paragraphs repeated from our Statement of Case are referenced in brackets at the end of the paragraph.

PART 1: URBAN DESIGN EVALUATION

1.1 Building for Life Assessment

As agreed at the PIM, I am also addressing the Urban Design quality of the proposals under this section, as there is a direct correlation between this and its impact on context and environment, both historic and in general. The analysis is based on Building for Life 12 assessment (2018 edition), which is included in Appendix NS2/1/1. This also refers to and expands upon the assessment included in the Report to the Planning Committee, paragraphs 315-359.

A particular concern is that, based on an analysis of the proposals and cross-referring to the concerns spelled out in the Committee report itself, a radically different result is obtained:

	<i>NCC Committee Report</i>	<i>NS analysis</i>	<i>Variation</i>
Green	20	9	-11
Amber	9	10	+1
Red	0	10	+10

A red score means that a particular aspect of a development needs to be reconsidered. Whereas the Committee Report finds **0 reds**, my analysis finds **10 reds** – over 1/3 of the indicators are red, which in normal circumstances should lead towards a complete re-assessment of the design principles. Building for Life assessment is of course only an indicative tool with some elements of subjective review, but a variance of this extent should be a grave cause for concern, especially when taken together with the lack of independent assessment highlighted later.

I should clarify that I have taken a more detailed appraisal by scoring each sub-section of the 12 questions, making 29 in total. This gives a more precise result, and avoids the problem of major non-conformances, e.g. 1d 'How should the new development relate to existing development? What should happen at the edges of the development site?', being 'hidden' under 1 Connections, which is granted an amber because 'the connections are good but the scale does not respond well to its surroundings'.

The red indicators cross-refer to the following items from our Statement of Case:

Indicator 1d, 6a - We share the view of Historic England that 'The massing and height of the proposed buildings will have 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' (4.1)

Indicator 6a, 7a - The street sections within the development show a more extreme ratio of height to width than is characteristic of the conservation area. Overall, the mass of the whole development would make it look, from certain vantage points such as the Castle ramparts and the pedestrian refuge on Aylsham Road, as a 'city within a city' in contrast to the 2 to 3 storey scale and traditional character of its surroundings (4.4)

Indicator 1d, 6a - The report to the City Council Planning Committee argued that Anglia Square already has these anomalous characteristics when viewed from a distance, and that any new development will therefore similarly not harmonise with its surroundings. We find this unacceptable: new development should enhance its location, not damage it further (4.5)

Indicator 1d, 6a - The Building for Life assessment in the Committee report also makes clear the problems of design impact on the surroundings. Considerable harm will be caused to the character and appearance of the area because:

- There is an abrupt change in scale to the parts of block A on the south side of Edward Street which rise seven to nine storeys and form part of a block with a very large footprint;
- The nine storey elements will be mostly hidden in views along the street. But because the seven storey parts project further out, this part of the development will fail to integrate well into its surroundings in terms of scale. This is also apparent in views from further away to the north;
- The buildings behind the Magdalen Street frontage build up quickly from 4 to 7, 9 and 11 storeys and this discordant relationship will be strongly apparent in views towards Magdalen Street from Cowgate;
- The absence of buildings of any scale to the west of Pitt Street will mean that this edge will mark a very strong change in the character of building within this part of the city; the scale of the new development will also overwhelm view of the historic Tudor Gildencroft cottages (4.6)

Indicator 5a, 6a - In terms of views, again the Planning Committee report clearly lays out the harm caused:

- The much-visited view from St James Hill is the most sensitive of the three panoramic views due to the ability to see all the city's landmarks. The Anglican Cathedral would remain the pre-eminent building but the proposed tower would distract from the group of iconic buildings. By strictly applying the standard Townscape Visual Impact Assessment (TVIA) method, this leads to a major-adverse effect;
- From Mousehold Avenue, the report states that the proposed tower appears lumpen and its visible bulk would be equal to the slender Cathedral spire and central to the view, thereby detracting from the Cathedral;
- The view of the Cathedral approaching from the north would have greeted visitors to Norwich for centuries. Existing buildings on the Anglia Square site currently largely obscure it but the proposed development fails to reveal more of the Cathedral when viewed from outside the development (4.10)

There are further red indicators for questions 1a, 1c , 3a, 4a, 5b, 7c, which are fully described in the Appendix.

1.2 Scale and density

The density of the scheme is 296DU/Ha in Phase 1, rising to 320DU/Ha for the development as a whole. Assuming an average of 1.5 people per home, Anglia Square would have a density of around 480 people per hectare; this compares with an average for Norwich of 33, and 44 for the City centre Mancroft ward.

The following table is extracted from the London Plan, where the relevant density range is highlighted in yellow and falls within the highest band of the City centre:

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)			
Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)		
Urban			
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
Central			
2.7–3.0 hr/unit	50–110 u/hr	100–240 u/ha	215–405 u/ha

Leeds, a city considerably larger than Norwich, stipulates a maximum density of 65DU/Ha for the City centre and fringe, a quarter of what is proposed here, reducing to 40DU/Ha in other urban areas (Core Strategy policy H3: Density of Residential Development).

The document ‘The Density Debate – a personal view’ attached in Appendix NS2/1/2 concludes: ‘what the evidence almost certainly does say is that super high densities, even in London, are only likely to work well if they accommodate people who have the choice about living in that type of housing. Such households are likely to be younger, aspirant households who will move on to other types of dwellings as their lifestyle changes. Outside London the case for very high density developments hardly exists outside one or two specific sites – particularly because they have higher maintenance charges and higher risks associated with them.’

This therefore is a matter of concern for the affordable housing within the scheme.

PART 2: DESIGN AND HERITAGE

2.1 Policy guidance

Paragraph 200 of the NPPF states:

‘Local planning authorities should look for opportunities for new development within Conservation Areas..., and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.’

The Anglia Square PGN states that the development will have a ‘clear relationship in built form with the surrounding area’. Paras 7.86 and 7.87 state that the site provides an opportunity for significant enhancement to the character of the conservation area, and that any future application will need to address how the proposals can successfully integrate and improve upon the existing townscape character.

‘Cathedral Cities in Peril’ by Foster and Partners (Appendix NS2/1/3) identifies a key risk in sites such as Anglia Square (P16), stating that single developers tackling very large sites can lead to homogenous and disconnected residential development with mass-developed large sites detached from existing urban fabric:

‘This type of urban fabric is obviously at risk when the city surrenders the ability to produce a masterplan to the developer, and a single investor mass-develops a huge site through generic planning based on repetitive patterns and self-referential designs. Despite the mixed

uses usually mandatory in expansions, excessive homogeneity of the built fabric is inevitable. Such expansion sites are also planned with sales in mind and thereby aimed at narrower markets than those existing in cities that took centuries to grow. Homogeneity in house prices, sizes and tenure helps to reduce the social diversity typical of existing cities.

Anglia Square is a text book example of the above quote; the Policy Guidance Note was produced in March 2017 as a response to, and influenced by, Weston Homes' masterplan of November 2016.

2.2 Impact on Heritage Assets and townscape

The Townscape and Visual Impact Summary in paragraph 381 of the Committee report illustrates that 20 out of 60 viewpoints have an 'Adverse' residual impact according to the TVIA methodology. Some of the effects of the development are judged to be major-adverse, including most tellingly, views from the Castle ramparts.

The Built Heritage Statement (BHS) tables 'harmful' impact to four of the six significant city landmark buildings, namely the Castle, both Cathedrals, City Hall, St. Peter Mancroft and church of St. Giles.

The BHS acknowledges in the annotation of the site 'Heat Map' (P73) that:

“ the cumulative impact that would result from development that approaches the recommended thresholds in all the parts of the site cannot be deduced by reference to the proposed (storey) thresholds alone. Likewise, it is accepted that where the thresholds are exceeded development is likely to have a major impact on the setting of heritage assets, potentially causing a high level of harm. However, other factors, such as the present conditions of the site and the overall design quality of the scheme, need to be taken into consideration in order to determine the level of harm that proposed development will ultimately give rise to. Similarly the aggregate impact on cumulative heritage significance and townscape is something which will need to be judged independently...”

This caveat means that it is not possible to ascertain, from the information supplied, the true impact of the development as necessitated by NPPF para 189, 190 & 194.

An example of where the scheme does not align with the height recommendations in the BHS is the north of the site where the report states “A 5 storey limit is recommended to the north west corner of the Site—all of Block D and the entire Pitt Street frontage of Block E. Proximity to the Grade I listed Church of St Augustine, Grade II listed cottages at Gildencroft, Grade II listed buildings lining the east side of St Augustine Street and the coherent historic character of townscape in the vicinity makes this an area of very high sensitivity (P75). The Heat Map shows this 'very high' sensitivity extending down Pitt street and round into the north termination of Botolph St. However, in both proposed and revised schemes, the blocks in this area are 5, 6 & 7 storeys in height. Section D (DAS p91) clearly shows a 7 storey 'warehouse style' block facing onto Pitt Street with a 2.5m potential plant over run. The revised section in the DAS is poorly annotated but appears to have increased to 8 storeys!

We would also question the assessment of the impact from the historic view of the City from Kett's Heights as being 'moderate-neutral'. The development will be clearly seen in unfortunate juxtaposition with the Cathedral spire.

Our other concern is with the whole concept of judging degree of harm from a static fixed viewpoint, when of course the impact will be seen while moving, therefore greater and cumulative in effect. For example, one view point located the tower behind a pub sign, in contrast to the view taken a few paces to the right:



The harm caused by the existing Anglia Square development should not be used to justify the proposed scheme, which will cause further harm. On the contrary, it should be a prime objective of the development to mitigate that harm, as proposed in NPPF para 200.

2.2 Independent Design Review

With regard to height and density, the tension between the design and the quantum of development was highlighted by Design South East when they reviewed an earlier pre-application version of the scheme (April 2017). The Panel was concerned that this proposal constituted over development. They felt it would not be possible to sensitively resolve a scheme at this level of density in this location and called for a clear demonstration of the viability evaluations driving the brief. Issues relating to this include the way that proposed buildings will relate to the City's surrounding historic fabric, the extent of overshadowing of public spaces, and the proliferation of single aspect flats. The Society strongly agrees with the reservations expressed by Design South East, and we consider that the current revised scheme has done little to mitigate them.

In accordance with JCS2 and the NPPF, Design South East reviewed the scheme at three stages:

- 1) design concept
- 2) Prior to submission - layout, form and massing
- 3) application stage – architectural quality of the tower.

We are very concerned that considering the negative review, only the tower was considered at application stage. This means the overall revised design has not been independently reviewed.

Considering the skewed analysis already referred to in the Building for Life Analysis, this is an important omission. Many of the mitigations listed against the harm imposed are based purely on design quality, therefore external objective design review is essential.

2.3 The Tower

Design South-East states the following regarding the tower:

‘We do not consider that this proposal yet demonstrates sufficiently special design standards, and the applicants should further consider issues such as, how it can sit more comfortably in relation to the Cathedral and other key historic buildings, ... However, the key issue is how the tower will be viewed across the city, and we are very concerned by the impact the scheme has on many of the verified views. Historic locations such as St Augustine’s Church and the Cathedral Close are particularly problematic.’

There has not been an independent architectural assessment of the post-application revised tower design, and our view is that the amendments do not answer the concerns raised above.

We disagree with the basic grounds for inclusion of a tower:

- Ground 1 - Significant public spaces in Norwich are marked by taller landmark buildings: Some public spaces in Norwich are marked by taller landmark buildings such as City Hall. However, others (such as Tombland) either do not have a single landmark, or have one that is not tall (e.g. St Andrew's Plain). It does not follow therefore that a new public space in the north of the city centre needs a tall landmark. Further, all the landmark

buildings in Norwich that positively punctuate the skyline and define public spaces have a civic or spiritual purpose. The proposed residential tower would be incongruous in that context (4.7).

- Ground 2 - The gateway entry into the city centre from the north should be marked with a landmark building:
Local plan policy DM3 states “Major development within 100m of the main gateways to the city ... will only be permitted where its design is appropriate to and respects the location and context of the gateway. New landmark buildings of exceptional quality will be accepted where they help to define or emphasise the significance of the gateway.” We do not consider that the proposed tower defines or emphasises the gateway; it does not need to be tall to do this, and is 150m away from both gateways. In fact we believe the tower detracts from the gateways due to its impact on the heritage assets.
- Ground 3 - The regeneration of Anglia Square should be symbolised and advertised though the erection of a prominent building of exceptional architectural quality:
We agree with Historic England that this is in conflict with the historical evolution of the city and its pattern of development. We see no reason why a tower should help to promote the area’s regeneration which could be symbolised in other ways – perhaps by some other kind of statement building such as a concert hall.
- Ground 4 - A tower would be a waymarker helping orientate people moving around the city:
The Planning Officer's report accepts the applicant's argument as ‘indisputably true’ that a tower would be a way-marker helping orientate people moving around the city and would therefore be a benefit. We strongly disagree that this argument provides any legitimacy for the building of a tower, with all the associated harm described in this Statement. The idea that people need a residential tower to orient themselves is absurd: local people will know where they are anyway and visitors will have no idea of the relationship of the tower to where they wish to go. (4.8)

We do not consider that the applicant has proven or justified their assertion that 20 residential storeys is the maximum they could build without unacceptably harming the setting of heritage assets. We do not believe that architectural design can resolve the inelegant proportions due to its inherent shape and height. Also this will not mitigate its effect on the historic views to and from elsewhere in the City, as described elsewhere.

The quality of the tower design is referenced in the mitigation of impact against a large number of the Grade I, II*, II, conservation areas and parks. It is not set out within the report who, within the CGMS team, is suitably qualified to determine its design quality; if it is not high quality design, as the Norwich Society would counter, then the assessment of impact on these significant heritage assets has not been mitigated.

As a residential development, rather than a counterpoint to the significant towers and spires of Norwich, the tower should be classified as residential, i.e. a modern equivalent to the 16-storey Normandie and Winchester Towers. These buildings are detailed amongst a list of seven ‘blocky’ towers within the Norwich City Centre Conservation Area Appraisal (P17) that are now considered as negative landmarks. We are concerned that the Anglia Square tower will in time be seen as deeply ill-considered and dated as these towers, but with a much more prominent position and negative impact on the city skyline.

There is also a danger of setting a precedent for a cumulative increase in the height of buildings across the city centre, which would harm its character. We would argue that any developer could use the same arguments of a ‘marker building’ and financial viability, and therefore this scheme encourages rather than inhibits other developers to follow suit, causing cumulative harm. (4.9)

PART 3: CONCLUSION

1. Norwich Society support Historic England in their view that 'The massing and height of the proposed buildings will have 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'.
2. The variance in the Norwich Society's Building for Life assessment with the Committee report is cause for concern, and highlights the lack of external and independent design assessment.
3. The proposed density for Anglia Square is well in excess of the maximum for a well-serviced urban area in London and is demonstrably inappropriate for a local centre in Norwich.
4. The housing is of inappropriate form and tenure set against the City's housing need, is limited in numbers, and will not be provided until Phase 2, causing concerns of deliverability
5. We do not consider there is justification for the tower, which will have a negative impact on the historic views to and from elsewhere in the City
6. There is a clear conflict with NPPF policies, and I conclude that the proposed development would cause considerable harm to the historic City centre of Norwich; such harm would outweigh any benefits arising from the scheme, and that planning permission should be refused.