



# THE NORWICH SOCIETY

Please reply to: Paul Burall, 5 Littlewood, Drayton, Norwich NR8 6FB  
Email: [norwich@burall.one](mailto:norwich@burall.one) Phone: (01603) 927289

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

## The Norwich Society

The Norwich Society is a civic society that was established in 1923 and now has around 600 individual members as well as a number of business members. Its aim is to protect and improve the city's unique character and heritage, particularly by encouraging the highest standard of architecture and town planning for Norwich as the City develops further.

The Society opposes the proposals for Anglia Square as being completely out of character with the City both in terms of architecture and density. We believe that, if the development is allowed to go ahead, it will damage both the local economy and the general attractiveness of the city.

## STATEMENT OF CASE

The Society focuses its case on sections a) to e) in paragraph 7 set out in the Secretary of State's call-in letter.

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

1.1 The proposals do not meet the NPPF guidance on sustainable development with regard to supporting 'strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations'. The range of homes to be provided does not accord with the 2017 Strategic Housing Market Assessment produced for the Greater Norwich Partnership.

1.2 With the exception of nine houses on the northern Edward Street site, the scheme is entirely flatted - the 1200 total being split between 637 x 1 bed and 563 x 2 bed flats. Given the scale of proposed housing, this represents a narrow mix of both dwelling size and type. The mix of dwelling type is too narrow and this concentration of flats will neither promote a mixed and balanced community, nor meet the needs of local people, nor result in cohesion with the existing community.

1.3 There are no affordable houses to be provided in the first phase and only 47 in the second. There is no financial guarantee that later phases of the scheme will ever be completed as this is dependent on the future economic environment: the existing Anglia Square development was never completed due to the

property market changing. There is a serious risk of the current scheme not being completed, repeating the unfortunate experience of the existing incomplete Anglia Square development.

1.4 The revised NPPF makes it clear that local communities should have a greater and earlier say in how a new development on their doorstep will be designed and integrated with the environment, including its build quality and visual appeal; local Planning Authorities are expected to apply this policy based on their understanding of an area's unique character. No such consultation has been carried out for Anglia Square.

## **2. The extent to which the proposed development is consistent with the Government policies for building a strong, competitive economy (NPPF Chapter 6)**

2.1 There is an array of international research that clearly demonstrates that the quality of place has an impact on the local economy, primarily by its influence on the ability of businesses to recruit essential specialist and professional staff. By way of example, former New York Mayor Michael Bloomberg summarised the importance of the ability to attract key staff when he wrote in the *Financial Times* that 'I have long believed that talent attracts capital far more effectively and consistently than capital attracts talent'.

2.2 Norwich businesses already have a major problem recruiting specialist and professional staff. An independent study carried out for the Norwich Society in 2017 showed 73% of the companies who responded had problems recruiting staff to come to Norwich to work and live, and a fifth of the companies listed skills shortage as one of the prime impediments to growth. On the positive side, almost all of those workers who had actually moved to Norwich enjoyed living in the City, with more than a third mentioning its beauty and heritage as the city's most positive features.

2.3 More generally, a 2019 report by Matthew Carmona – *The Ladder of Place Quality* – examined 271 case studies from the UK, USA and various European countries and concluded that strong private and public economic benefits result from place quality.

2.4 Maintaining and enhancing the city's quality of place rather than turning it into an 'anywhere' environment is crucial to attracting staff and businesses from elsewhere and sustaining the important tourism and visitor sectors.

## **3. The extent to which the proposed development is consistent with the Government policies for ensuring the vitality of town centres (NPPF Chapter 7)**

3.1 Norwich is a thriving regional centre that benefits from an attractive environment that brings people into the city centre. This proposed out-of-character city-fringe development close to such major attractions as Elm Hill and the Cathedral will have an adverse impact on the vitality of the city and will cause serious damage to the city's attractive image.

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

4.1 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'.

4.2 The NPPF states that 'Great weight' should be given to the conservation of heritage assets, including by development affecting the setting of a heritage asset. The current proposals for Anglia Square fail this test completely and that there is a clear conflict with NPPF policies.

4.3 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: the current revised scheme has done little to mitigate these issues.

4.4 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.

4.5 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 successfully harmonise with its surroundings. We find this unacceptable: new development should enhance its location, not damage it further.

4.6 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.

4.7 The proposed tower has been justified on the basis that significant public spaces in Norwich are marked by taller landmark buildings such as City Hall. However, others (such as Tombland) do not have a single landmark, or have a landmark that is not tall (e.g. St Andrew's Plain). It does not follow that a new public space in the north of the city centre needs a tall building or a single landmark, as argued by the applicant. Further, all the landmark buildings in Norwich that positively punctuate the skyline and define public spaces that have a civic or spiritual purpose. The proposed residential tower would be incongruous in that context.

4.8 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.

4.9 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.

4.10 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, and there is no reason why it should not be applied strictly, 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.

4.11 Some of the effects of the development are judged to be major-adverse according to the TVIA methodology. 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.

## **5. The extent to which the proposed development is consistent with the development plan for the area including any emerging plan**

5.1 The application does not accord with relevant local planning policies, as follows:

### **The 2017 policy guidance note (PGN) for Anglia Square**

5.2 This states that the height and traditional character of buildings and streets to the north and east of the site 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. The height and bulk of the proposed development clearly does not respect these criteria.

5.3 It also states 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. The current proposals ignore this and instead use the height of Anglia Square as a justification for further increases in height and do nothing to reinstate the views previously lost.

5.4 The PGN also states that new development should be sensitive to the scale of existing buildings in their vicinity and must respect the setting of historic assets. Certain vistas and viewpoints within this part of the conservation area may determine where development can occur in the site boundary, without negatively affecting the setting and significance of the identified heritage assets. The current proposals do not achieve this.

5.5 There may be scope to provide a landmark building within the site. However, the PGN makes the point that 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. Any proposed tall buildings will need to be carefully designed, positioned and oriented to complement the historic streetscape and respect key views across the city centre from and through the site. The proposed tower does not comply with this.

5.6 The PGN also states that proposals should have no detrimental impacts upon the character and amenity of the surrounding area (including open space and designated and locally identified natural environmental and heritage assets). The proposals for Anglia Square are clearly detrimental to the surrounding area and heritage assets.

5.7 The PGN calls for a mix of dwellings, in terms of size, type and tenure including (where the size and configuration of the site makes this practicable and feasible) a proportion of family housing and flats to meet the needs of the community. The proposal offers a very poor mix and quality of homes, with very few units large enough for families and fewer than 10 per cent being affordable. Most of the homes are very small; many have entrances from long internal corridors with no windows.

5.8 The PGN also states that proposals should achieve a density in keeping with the existing character and function of the area, taking account of the significance of heritage assets where relevant and the proximity to local services, and/or public transport routes. The development is well served by public transport with numerous bus routes. However, the proposed density is totally out of proportion for Norwich. With more than 1200 units on 4.51 hectares, the density will be around 275 dwellings per hectare. Assuming an average of two people per home, Anglia Square would have a density of around 550 people per hectare; this compares with an average of 44 in the City centre Mancroft ward. Even if every home had only a single occupier, the density would still be very high. Significantly, the proposed density is far higher than that which will be considered acceptable elsewhere: the London Plan recommends a density for an urban area as 60-70 dwellings per hectare while Leeds – a city considerably larger than Norwich – has a housing policy that stipulates a maximum of 65 dwellings per hectare for the edge of the City centre, less than a quarter of what is proposed for Anglia Square.

#### Norwich Development Management Policies Plan

5.10 This contains the following relevant policies:

5.11 Policy DM3 gives considerable weight to a number of key design principles including the need to protect and enhance significant long views of major landmarks, including the St John's Roman Catholic Cathedral, Norwich Cathedral, and City Hall. As we have demonstrated above, the planning committee report on Anglia Square clearly laid out the harm caused to key views.

5.12 Policy DM9 aims to ensure that development has regard to the historic environment and takes account of the contribution heritage assets make to the character of an area and its sense of place. Furthermore DM9 requires development to maximise opportunities to preserve, enhance or better reveal the significance of designated heritage assets. The proposals clearly fail to meet this test.

5.13 Policy DM12 sets out other policy principles that apply to all residential developments:

- Proposals should have no detrimental impacts upon the character and amenity of the surrounding area (including open space and designated and locally identified natural environmental and heritage assets);
- Proposals should provide for a mix of dwellings, in terms of size, type and tenure including (where the size and configuration of the site makes this practicable and feasible) a proportion of family housing and flats to meet the needs of the community. The mix will be based on the findings of the Housing Assessment or subsequent assessments;
- Proposals should achieve a density in keeping with the existing character and function of the area, taking account of the significance of heritage assets where relevant and the proximity to local services, and/or public transport routes.

5.14 As we have pointed out above, the proposed residential density of this development is approximately 275 dwellings per hectare. This density is high and would exceed by a considerable margin that of any other residential scheme elsewhere within the city. Clearly, the proposals do not comply with this policy.

#### **6. Any other matters the Inspector considers relevant**

6.1 Alternative schemes have not been properly assessed in terms of viability. We refer particularly to option 6 - Cathedral Magdalen & St Augustine's Forum (CMSA) 'Norwich North City Vision – St Augustine's & Anglia Square Regeneration Community Brief'. This was not considered by the landowner/developer and yet was deemed not to be a viable proposal. We suggest that this should be further investigated. There is no reason why this option should not address the operational needs of the shopping centre and existing tenants and support the continued function of the principal element of the northern large district centre. There is no independent viability assessment about whether the extent of residential and commercial development would provide sufficient value to fund the costs of redevelopment.

6.2 The planning report suggested that two options would achieve a mix of beneficial land uses and a massing of development which would reflect the height of existing buildings on the site and/or the surroundings. These two options provide considerable scope to achieve a form of development which results in environmental improvements to the appearance and function of the site and an enhancement of this part of the city centre conservation area. They were judged by the applicant not to be viable based on the scale of development costs and projected values of the quantum of development but there has been no independent verification of this.

6.3 The developer's viability arguments are also somewhat undermined by the fact that the original 25 storey tower was justified on the grounds that it was necessary to make any development viable yet the developer then reduced the tower to 20 storeys, still claiming that this was essential to viability.

6.4 What also brings the developer's statement into question is the delivery of other schemes nearby, also on brownfield sites, where viable development has been achieved or is planned at much lower densities and heights: St Mary's Works; St Anne's Wharf; and the Jarrolds site in Barrack Street.

## **7. Conclusion**

7.1 For the reasons outlined above, the proposed development conflicts with relevant local and national policies and would cause considerable harm that would not be outweighed by any benefits. We note that the Planning Committee's decision to approve the application was made by just 7 votes to 5 and that the officers report described their recommendation for approval as 'finely balanced'. However, the harm caused by this development would appear to be so substantial that it cannot reasonably be claimed that the issues are finely balanced: the weight of evidence suggests that the application should be firmly rejected.