

TOWN AND COUNTRY PLANNING ACT 1990

PLANNING APPLICATION CALLED IN BY SECRETARY OF STATE

ANGLIA SQUARE, NORWICH NR3 1DZ

APPLICATION REF: 18/00330/F

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

STATEMENT OF CASE BY SAVE BRITAIN'S HERITAGE

Introduction

1. SAVE Britain's Heritage submitted written objections to the planning application for the redevelopment of Anglia Square on 1st October 2018. It urged Norwich Council to refuse planning permission for the proposed development. SAVE fully supported Historic England's objections to the scheme and its request to have the application called in by the Secretary of State, should Norwich City Council be minded to approve the scheme. SAVE regrets the Council's resolution on 6th December 2018 to approve the application, but welcomes the Secretary of State's decision to call in the matter for Public Inquiry.

2. SAVE has a long track-record of campaigning to protect Britain's historic environment. SAVE is not a statutory consultee and receives no government funding. Given its limited resources, SAVE selects very carefully the cases it chooses to comment on, and those it decides to pursue at public inquiry. However, such is the national as well as local importance of this case that SAVE has applied for, and been granted, Rule 6 status so that it can put its case in full to the Inquiry.

The Proposal

3. The scheme proposes 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. The scheme includes a 20-storey tower (reduced from 25 storeys) and blocks of 4-12 storeys, replacing existing post-war structures but also older existing buildings on the west side of the site. The whole site lies within the Norwich City Centre Conservation Area.

Planning History

4. Planning permission was granted in October 2009 (08/00974/F) for comprehensive regeneration of Anglia Square and its environs, including 200 residential units, a food store and health centre. A phased planning consent was granted in March 2013 (11/00160/F) for the comprehensive redevelopment of Anglia Square including a new food store, car parking, additional retail, 105 residential units and a crèche. Neither of these schemes has been implemented.

5. The current scheme was considered by the Planning Applications Committee of Norwich City Council on 6th December 2018 which was minded to grant planning permission. The scheme was subsequently called in by the Secretary of State.

Assessment of Heritage Assets and their Significance

6. SAVE considers that Norwich is one of the finest cathedral cities of Britain, one of the great medieval cities of northern Europe, and one of the best preserved. SAVE will show that Norwich, with its unrivalled collection of surviving medieval streets and historic fabric, compares very favourably with other cathedral cities in England. The Norwich City Centre Conservation Area includes the totality of the area within the medieval city walls and is a designated heritage asset of the utmost and highest significance when considering all the relevant criteria. The city walls encompassed a larger area than any other medieval city in Britain. Within its boundaries thirty-five medieval churches survive, more than any other city north of the Alps. The whole of the application site lies within the City Centre Conservation Area.

7. A large number of individually designated heritage assets are also affected by the development proposals because of the likely impact on their setting. These include many listed buildings afforded grade I or II* status.

8. The importance of Norwich's remarkable heritage has been widely recognised both locally and internationally, for example by the 'Norwich 12' initiative devised by the Norwich Heritage Economic and regeneration Trust (HEART) which secured £ 1 million Government money to promote the city's heritage, and Shaping 24 Project which linked Norwich and Ghent, funded by the European Regional Development Fund.

9. Within the application site, at its south-west corner, lie a group of mainly two-storey properties, including a public house and a terrace of 19th century houses with a forge at its rear, which contributes positively to the character and appearance of the Conservation Area by reason of their historic and architectural interest. The scale of these properties is completely in keeping with the prevailing scale of the surrounding historic environment to the north, east and west of the application site.

Policies and Guidance for the Historic Environment

10. SAVE will refer to the following national and local policies and guidance for the protection of the historic environment:

- Planning (Listed Buildings and Conservation Areas) Act 1990
- National Planning Policy Framework 2018, particularly Section 12 Achieving Well-designed Places and Section 16, Conserving and Enhancing the Historic Environment
- National Planning Policy Guidance July 2019
- English Heritage Conservation Principles, Policies and guidance 2008, re-issued by Historic England 2015
- Historic Environment Good Practice in Planning Advice Note 3: The Setting of Heritage Assets (2nd Edition 2017)
- Norwich City Council Adopted Local Plan (2014), particularly Policy DM1, DM3, DM9
- Norwich City Centre Conservation Area Appraisal 2007
- Norwich City Council Planning Policy Guidance Note for Anglia Square 2017

Impact of the proposals on the Heritage Assets

11. SAVE considers that the proposed development will have an extremely harmful impact on the historic environment of Norwich. Firstly it will fundamentally change the historic skyline of Norwich which remains today as one of Britain's finest medieval cities where the cathedral and church spires, castle and town hall are legible and dominant in the townscape. Because of the proposed scale, height and massing of the proposed scheme its impact will be widespread, across much of the City of Norwich and beyond, from within the conservation area and outside it. This impact is magnified by the topography of the medieval city which lies in a valley astride a river.

12. Secondly, the proposals, by reason of their height, scale and bulk will be visible from many streets and public spaces which currently contribute to the very special character and appearance of this medieval city, and will have an adverse impact on the Conservation Area.

13. Thirdly, the proposals will cause very serious harm to the setting of several individually designated heritage assets or groups thereof, including St Augustine's Church and churchyard, St George's Church (both listed Grade I) and Bacon's House, listed Grade II*.

13. SAVE considers that the cumulative effect will result in substantial harm to the designated heritage asset which is the City Centre Conservation Area. It will also cause very serious harm to the setting of several individually designated heritage assets.

Assessment of public benefits

14. SAVE acknowledges that much of the existing Anglia Square development is detrimental to the character and appearance of the conservation area. Its redevelopment in principle is something to be welcomed, but its replacement with buildings of considerably greater height and bulk promises to make matters much worse.

15. The applicant suggests that the proposed development will result in heritage benefits, including reinstatement of views of the cathedral which were lost when Anglia Square was built 50 years ago. SAVE considers that the value of these new vistas will be much diminished by the scale and context of the development itself, and in any event do very little of mitigate the widespread harm that the proposals cause across the whole of the medieval city.

16. In its Townscape Visual Impact Analysis the applicant repeatedly claims that in views where the new tower will be clearly visible the effect will be beneficial, suggesting that it will act as a new landmark for Norwich, enabling its citizens to navigate around their city, and drawing people to the development itself. The implication is that the creation of a new landmark north of the River Wensum will be beneficial to the character and appearance of the medieval city. SAVE strongly refutes this notion, and any pretence that the form and design of the tower is somehow on a par with, or acts as a counterbalance to the cathedral.

17. SAVE is aware that the applicant, and the City Council, consider that there are other public benefits generated by the proposals, notably the creation of housing, new shops, car parking, sustainability and public realm. SAVE understands that other objectors will be dealing with and analysing many of these matters, but shares their concern that many of the supposed benefits are overstated or could be achieved elsewhere or in a less harmful way.

Balancing the Harm against Public Benefits

18. NPPF requires that development proposals which cause either substantial or less than substantial harm to designated heritage assets require a balance to be struck between harm and public benefit, but also requires in Paragraph 193 that great weight should be given to the assets' conservation, and the more important the asset, the greater the weight should be. This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

Alternative visions for the application site

19. SAVE is aware that there are alternative visions for the development of Anglia Square and its surrounding vacant sites which are shared by the local community group, the Norwich Society and Historic England. SAVE suggests that even if these are not detailed proposals or schemes that have been refined into a planning application it is a matter that should be given considerable weight in terms of assessing the current proposals, particularly if these alternatives can be shown to cause less harm to the historic environment whilst also achieving public benefits. The possibility of an alternative vision being implemented in a phased or incremental way, by a series of different agencies, over a considerable period of time, is also an important consideration.

20. The issue of viability and deliverability is clearly an important issue, but it is understood that the current scheme involves in the order of £12 million of public subsidy. This has an impact on the issue of Optimum Viable Use, which needs to be considered in the light of the recent NPPG. If it is possible that an alternative scheme, which did less harm to the designated heritage assets and which created equivalent or

greater public benefits, could be implemented without requiring greater public subsidy, then this should surely be considered to be the Optimum Viable Use for the site.

Conclusion

21. SAVE considers that the proposals cause a very serious level of harm to the significance of the designated heritage asset of the Norwich City Centre Conservation Area and to the settings of a large number of statutorily listed buildings. The cumulative impact of this results in substantial harm.

22. SAVE concludes that great weight should be given to the protection of the historic environment. Given the unique nature of the medieval city of Norwich and its skyline it is considered that the harm caused by the proposals grossly outweighs the total of all the public benefits that are purported to be generated. The proposed scheme if implemented would cause long-term harm to the city that would be regretted by generations to come. It repeats the mistakes of the 1960s but on an even greater and more damaging scale. The Secretary of State is requested to refuse the application.