

# Objection to Anglia Square proposals

*Cllr Martin Schmierer (Green Party Councillor for Mancroft Ward)*

As a ward councillor for the area, I wish to object in the strongest terms to this application, which displays a total lack of concern for the local character and context and the needs and desires of local residents. My reasons for objection are detailed below.

## **Affordable housing**

The proposed figure of 10% affordable housing is very low, compared to the local policy requirement of 33%.

The applicant's Affordable Housing Statement claims that even with a £12.2m grant from the Housing Infrastructure Fund, an increased site area and number of dwellings since the initial viability appraisal, *and* exemption from CIL, the scheme could still only provide 120 affordable units. This represents exceptionally poor value for money. The recently approved application for the nearby St Mary's Works site included a contribution of £353,234 for affordable housing, deemed by Norwich City Council to be equivalent to four 1-bedroom dwellings. This equates to £88,309 per dwelling. Multiplied by 120 (the proposed number of affordable units for Anglia Square), this gives a cost of £10,597,020 – substantially less than the HIF grant. If Weston Homes/Columbia Threadneedle think they can take all this public money, for land which will all remain privately owned; evade all their obligations to provide public infrastructure through CIL (equating to an enormous amount of money, on such a large development), and still only produce 120 affordable homes (effectively all paid for by the HIF grant), they need to be told in no uncertain terms to think again.

Affordable housing contribution must not be in the form of a commuted sum. This is currently a relatively affordable area of the city, and the new dwellings should meet local need. On such a large site, with even 10% of the total number of dwellings equal to 125 homes, there is no justification for not providing affordable units on site.

## **Public amenity and public realm**

When looking at the masterplan, it is striking how little greenery is proposed for the site compared to the surrounding area. Most of the green space is in the form of roof gardens, which, while in themselves a welcome feature, do not meet policy requirements on enhancing appearance and character (since they will not be visible except from higher buildings) or on enhancing habitat links (policy DM3 i), will not be accessible to the general public, and will not help to alleviate air pollution at

ground level or break up the imposing mass of tall buildings.

I do not believe the proposals are in line with Policy DM8 of the Norwich Local Plan (Open space), which requires the provision of informal publicly accessible recreational open space onsite and provision for younger children's play space in developments with in excess of 100 child bed spaces. Mentioning two existing offsite play areas (Gildencroft and Leonards St) is not the same as providing space on site. These two play areas are across a busy road and do not compensate for the lack of playspace on site.

I am very concerned about the extent of overshadowing which would be caused by such large buildings. St Augustine's Street, Magdalen Street, Edward Street and Leonards Street would all be significantly affected and amenity of residents reduced. The proximity of buildings within the new site would also result in a lack of privacy for many of the new residents.

### **Scale and mass of buildings**

I wish to take issue with the claim (from the Design & Access statement) that "To the north, the skyline significantly offers an opportunity to echo the interest provided by the City landmarks." Norwich's skyline is not an 'opportunity' for a massive tower block. It is distinctive and low-rise and should be protected. The developer displays astounding arrogance in claiming their proposed 20-storey block can 'echo' Norwich Cathedral. The proposed tower is far too tall for Norwich, and in particular for this historic area.

However, the problem is wider than just the tower. The entire proposal is of a mass and height which would completely dominate the area, and has no particular architectural merit which might help to justify such dominance.

Policy DM12 of the development plan 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". The proposed densities are far from in keeping with the character of the area and do not respect the nearby heritage assets.

The proposed density, at 278 dwellings per hectare, is typical of the most densely populated developments in London, and is way out of keeping with anything found anywhere in Norwich – and this includes 1,500 car parking spaces, which you'd be unlikely to find in an equivalent scheme in London, making the density of the actual residential space even higher.

High-density urban housing is what we need to be building, but this kind of 'superdensity' housing requires very careful consideration to be given to the impacts on infrastructure and amenity. Massive, dense mid-to-high-rise blocks can be

detrimental to quality of life if they are not exceptionally well planned and designed, well maintained, and accompanied by sufficient funding for infrastructure. I see nothing in the application to reassure me on these points.

The Planning Statement warns that “the viability assessment work indicates that approximately the number of dwellings currently proposed is required in order to achieve the delivery of the comprehensive redevelopment of Anglia Square.” (para 4.40) Yet fewer dwellings does not necessarily reduce viability. Infrastructure for tall buildings, such as lifts and sprinkler systems, is expensive; smaller scale buildings would be cheaper to build. Flooding the market with so many similar dwellings could also result in a reduction in value. The desirability, and therefore the value, of flats in such a high-density, high-rise development (certainly extremely high-rise for Norwich) also has to be considered. A smaller number of dwellings could make the development more desirable, increasing value and therefore viability. Without seeing the detail of the viability assessment, it is difficult to comment further; I am raising these issues now to point out that the developer’s claims about viability should be robustly assessed and not taken at face value.

### **Design and character**

Perhaps the most objectionable aspect of this thoroughly disappointing application is the total disregard it displays for the unique character of the area. There is no evidence that any consideration has been given to respecting the conservation area and the setting of the ancient listed cottages on St Augustine’s Street, and no indication that the features of the local area, its layout and architecture, have been taken into account. The plans show a collection of soulless identikit blocks that could be anywhere. If anything, they look like parts of London. They certainly don’t look like Norwich.

Lowering the height of the buildings closest to St Augustine’s Street does not address the problem of a development that is fundamentally too massive and out of place in this part of the city. A few metres back, the building steps up several storeys, meaning the overall effect is still of an imposing block. Some of Norwich’s most historic and attractive streets will be overshadowed, overpowered and spoiled by this insensitive design.

The proposals do not comply with policy DM3 of the development plan, which states that “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.” The current proposals pay no regard to the character of the

conservation area and – run-down mistake as the existing Anglia Square undoubtedly is – would actually have a negative effect on the sense of place through their sheer disregard for local context.

Policy DM3 also states that “The density of development must take account of the need to protect and enhance heritage assets and their settings, where these would be affected.” This is clearly not the case with this proposal, which does not properly consider the listed heritage assets on St Augustine’s Street and Magdalen Street, and how significantly their setting would be harmed by this development. Such is the excessive scale of this development that it would also harm the setting of Norwich Cathedral, currently the focal point of the Norwich skyline.

I support some of the details such as the inclusion of air source heat pumps, the roof gardens, and the swales and green walls proposed for the Pitt Street edge of the site.

### **Layout and permeability**

The Policy Guidance Note makes clear that “some of the previous development has severed clear routes through Anglia Square and has a negative impact on permeability, to the detriment of the surrounding area” (3.1), that “The development served to disrupt and erode the historic road network and effectively severed links between the city and its northern suburbs and between Magdalen and St Augustine’s Streets.” (3.19), and that the opportunity to “re-connect this site with neighbouring areas, removing buildings which restrict permeability in order to improve access to neighbouring areas whilst creating new attractive and landscaped routes across the site” is a key priority (7.56).

The redevelopment of the site provides an opportunity to rectify this situation by reinstating the old street layout and providing a clear connection between St Augustine’s Street and Magdalen Street. Unfortunately, despite what they claim, the current proposals do not do this in any easily legible sense. The ‘square’ of Anglia Square is retained and another one added, despite this being a feature that was fairly arbitrarily added in the 1960s with little regard for the historic streetscape or the character of the area. The extremely dense and imposing mass of tall buildings would function more as a barrier between St Augustine’s Street and Magdalen Street than a coherent link between them.

### **Transport, traffic and air quality**

It is difficult to see how the impact on air quality of several hundred new parking spaces in a city-centre site of this size can be deemed ‘negligible’ (in the health impact assessment). The planning statement even acknowledges that legal limits for nitrogen dioxide are likely to be breached (4.60). Ventilation to reduce indoor exposure to polluted air is not enough; any new development should start from an aim to improve air quality - not worsen it and then tell residents not to open their

windows. If Anglia Square is to be a place where people can safely and enjoyably linger and socialise, the air needs to be fit to breathe outdoors as well as indoors. After the government lost three times in the High Court over its air quality plans, stricter laws on air pollution are clearly coming sooner or later. The council will make life more difficult for itself if it approves applications like this which have a negative effect on air quality in already polluted areas.

The scale of the development will also have a major impact on traffic congestion, in an area of the city that is already extremely congested. The cumulative impact of all the proposed developments in this area needs to be given more careful consideration – planners need to ask themselves whether, given the constraints of infrastructure, air quality concerns and climate change, we can really afford to create new parking spaces for new homes in the city centre. Given that 25% of Norwich households do not own a car, and that this figure is likely to be higher in central areas, the proposed 75% residential parking provision is not low enough to reduce car ownership or make a positive difference to travel patterns.

I welcome the proposed high levels of provision of cycle parking. It will be important to separate cycle and pedestrian routes through the site as far as possible to minimise conflict and make the routes safe and practical for both.

### **Retail, leisure and commercial uses**

The amount of retail space proposed is too high at a time when the high street is struggling. Anglia Square currently serves a distinct purpose, meeting the convenience needs of local residents. There is a danger that this purpose will be lost as higher rents on the new units push tenants out. The area needs to be retained as a district centre and not try to compete with Chapelfield or the city centre. Additionally, Magdalen Street currently complements Anglia Square as a shopping area and has a distinct character of its own. This could be threatened by large new retail units, and could result in the loss or deterioration of a major asset to Norwich. I am very concerned that the thriving artistic community currently based in and around Gildengate House will be lost. In line with policy DM22, the applicant must show how these community facilities will be protected or suitable alternatives found. The provision of affordable studio space has enabled art graduates to stay in the city and develop their own businesses, while organisations such as Print to the People, Men's Shed and FarmShare provide valuable services to the local community. Any consideration of possible economic benefits from the redevelopment needs to also take into account the cost to the community of losing these assets. The site needs to be redeveloped, but the council must not allow this to result in another soulless development like Riverside, at the expense of the existing community.

### **Conclusion**

This is a deeply disappointing and unimaginative proposal which fails to take inspiration from the wealth of historic character surrounding the site. Anglia Square is a key site in the city, and it is so important to get its redevelopment right. The current proposals represent significant overdevelopment which would result in poor amenity for neighbours and future residents as well as harm to the conservation area and the setting of listed heritage assets. They would be completely out of place in Norwich and significantly damage the unique character of this part of the city. Additionally, the proposed level of affordable housing is much too low for a scheme that will be receiving millions of pounds of public money – especially if it is seeking exemption from CIL as well.

All this prompts the question: who is this development actually for? It does not meet the needs of local residents, who will be priced out or their neighbourhood spoiled, their independent shops and art studios lost, their roads clogged and their green spaces put under pressure from massively increased use with no accompanying investment. The developer has ticked the 'community involvement' box by giving various presentations, but has not listened to any of the feedback given. Precedent elsewhere in the country suggests that the flats will be largely investment properties. They are sure to be financially beyond the reach of most Norwich residents. If these proposals go ahead, I fear this part of Norwich will be blighted by mistake that takes 50 years or more to rectify. We can do better than this!