



Comparative Note on Skyline and Views Protection Policies: Norwich and York

Produced for Cathedral Magdalen & St Augustine's Forum

Revision Schedule

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1. Skyline and Views

Existing Policy

- 1.1 Norwich City Council has two areas of policy which set out its current approach to view management in relation to new development. The first is via the Development Management Policies Local Plan, Policy DM3 and Appendix 8. The second is via the completed Conservation Area appraisals

Policy DM3: Design Principles and Appendix 8

- 1.2 Policy DM3 sets out a number of design principles. Part a discusses gateways and part b views and landmarks, both are relevant to this study.
- 1.3 The Policies Map locates the gateways to the City discussed in DM3(b). Within the proposed neighbourhood plan area these are St Crispins Roundabout (Pitt Street/St Crispins Road (A1067/A147)) St Augustine Street, Magdalen Street (A1151) junction with Magpie Road. Within the wider CMSA area there are two locations where the policies 100m buffer overlaps the area Bishop Bridge and Yacht Station (River Wensum). The Norwich City Interactive Local Plan Map plots the buffer for each:
<https://ncc.maps.arcgis.com/apps/webappviewer/index.html?id=7ff6d4cdf8ca4d70b50e935fec378e11>
- 1.4 DM3(b) requires protection and enhancement of the significant views and major landmarks identified in Appendix 8 and those in conservation area appraisals. Appendix 8 states that it shows long views and strategic viewpoints but there is no key indicating which is which, although as there is no differentiation in relation to the policy this is not a significant issue. This contains the map showing the viewing location of views (receptor) (an eye symbol) two different directional symbols and 6 key towers each marked by a star. The views indicate two direct views to the Catholic Cathedral and City Hall. The remaining three views indicate a view cone although there is no discussion.
- 1.5 The scale of the symbols in relation to the scale of the map and the blocking out of the basemap below the symbol mean that the exact location of the view point and the landmark tower/keep is not clear. Neither does the Interactive Map provide any details. Given the lack of detail in the plan it is unlikely that there will be a fixed locator marker. The view locations are St James' Hill on Mousehold Heath, probably Ketts Heights, possible Mousehold Avenue or the Allotments in the vicinity, Wensum Park, and probably Margaret Paston Avenue. Without the exact location of the view prescribed some flexibility is given in assessing the views when considering development, moving 50cm or less in any direction when considering the relationship of the development with the landmark building may mean that the assessment may be skewed. The neighbourhood plan area and the wider CMSA fall within the viewing area of all but MPA to the Catholic Cathedral view.
- 1.6 There is no discussion of the interrelationship between the landmark buildings and other tall buildings within the City. The Policy is focused on buildings as landmarks, the River is also a landmark view from outside the City Council Area looking inward and may be important to preserve.

- 1.7 Further discussion is set out in the Supplementary Text to the Policy, in particular paragraph 3.6 on gateways and 3.7 on topography and views and 3.8 on the character of the local area including views.
- 1.8 This Policy DM3 (a) and (b) manage design with particular locations. However, the precise locations of the receptor cannot be pinned down. There is no indication of what is significant or special within the view, or what the aim of the policy is in each view, for example the foreground, background, competition/distraction within the view to either site of the landmark and any enhancements to the view such as tree removal.
- 1.9 Local Views are set out in conservation area appraisals. The whole of the City Council Area is not designated a conservation area, not all conservation areas have appraisals. The protection of local views or longer views is not recognised elsewhere. These are currently unprotected.

Conservation Area Appraisal

- 1.10 The City Centre Conservation Area appraisal covers the whole of the designated conservation area within the study area. Part of the wider area does not lie in a conservation area. The appraisal was published in 2007. It should be considered to hold the weight of an SPG and not an SPD
- 1.11 There are positive and negative vistas shown with arrows on maps within the character areas. The Accuracy of the marking of these arrows is also questioned, there is for example a view described in the Anglia Square Character Area as a view from St Crispin's Roundabout to the Anglican Cathedral, the Cathedral is located off the map, the positive view shown on the map includes a building described on a later map as a negative building.

2. Strategic and Greater Norwich

- 2.1 The Joint Core Strategy (JCS) 2014 encompasses Norwich City, Broadland and South Norfolk. It encompasses the City and a significant area beyond. There are no strategic policies relating to views or skyline in this document.
- 2.2 Policy 1 is very broad stating that the built and historic environment and their settings will be conserved and enhanced.
- 2.3 The Norwich City Centre policy, Policy 11, refers to the enhancing of the historic city of Norwich in relation to its buildings, archaeological assets and its distinctive character identified in conservation area appraisals.
- 2.4 Policy 12 concerns 'the remainder of the Norwich Urban Area, including the fringe parishes' and discusses the protection of the landscape setting of the urban area and improvements to townscape.
- 2.5 The strategic planning for Norwich City, Broadland and South Norfolk is now being reviewed by the Greater Norwich Local Plan Partnership. The emerging strategic local plan Regulation 18 Consultation on 'new, revised and small sites' is out for consultation until 14.12.18 (<http://www.gnlp.org.uk/>). This consultation offers the opportunity to add a representation on strategic level policies on views and skyline to the City area and wider area, for example

the Anglican Cathedral can be seen from the A47 and the A146 out with the City Council boundary.

3. Comparison/Benchmark

- 3.1 Norwich is an historic Medieval walled city, capital of the region and historically larger than London. York is similarly noted for its medieval walled city (although the walls are substantially intact and capital of its region holding similar draw for employment and housing (although many now priced out of the Market and attracting 7million visitors a year, it has a second big attraction that of the railway history).
- 3.2 York is a Unitary Authority. Norwich is not, it has the role of a borough council with the additional responsibility for its own Highways (and a number of rights relating to the Corporation of Norwich through the centuries).
- 3.3 The City of York Draft Local Plan Incorporating the 4th set of changes Development Control Local Plan adopted April 2005 is the current plan https://www.york.gov.uk/downloads/file/3663/the_local_plan_2005_-_development_control_local_plan_full_document_and_appendicespdf. The emerging local plan was submitted on 25.5.2018 for examination. The current plan contains policies which protect the Minster’s skyline and the city Centre roofscape SP3(b), GP1(e), GP20(c) telecoms and supporting text in relation to conservation areas.
- 3.4 York’s Central Historic Core Conservation Area appraisal and management strategy was developed out in partnership with Historic England and a consultancy company. It was adopted in Nov 2011 (probably as a SPD, but this is not clear). Section 3.0 Views and Building Heights includes views within and out with the Conservation Area which could have an impact upon it. One of the longest views of the Minster is 11.5 miles to the south, as York is low lying, with the exception of Clifford’s Tower (keep elevated on a mott) with a ‘ring’ of hills surrounding it. The policy can be viewed here: https://www.york.gov.uk/downloads/file/5922/york_central_historic_core_conservation_area_views_and_building_heights. Section 5.8 considers the management strategy for views and building heights and suggests a Views and Buildings Height Supplementary Policy Document should be developed probably with 3D modelling, it suggests Edinburgh and Liverpool as good models to follow.
- 3.5 The historic core of Norwich is also low lying with a river running through it, although hillier than the centre of York, it can be viewed from a number of higher surrounding areas. The Castle and Clifford’s Tower are also similar. Topographically there are similarities, but there are some differences.

Comparative Table

| | York | Norwich |
|-------|---|---|
| Scale | Key long-distance views; key city-wide views; Key historic core views; | Long and strategic views (city-wide); positive and negative vistas within some conservation areas |
| Type | Fixed focal point; dynamic; dynamic with focal point; panorama; dynamic panorama; | Unfixed focal point, unfixed receptor point with no description |

| | | |
|------------------------------|---|--|
| | dynamic panorama with focal point; other views. York focus on Minster and towers and spires; landmark; local dynamic; local dynamic with focal point; local dynamic panoramic (Local are contained within character areas of the City Conservation Appraisal) | |
| Description and Significance | What is the view and what can you see that you may want to protect. Why is it important and what detracts from the view. Illustration of historic view; historic association/link generally visual | States what the view is of without description. |
| Protection | Backdrop; foreground; above tree line; above buildings; skyline; silhouette; opportunities to create new skyline/build taller | No information |
| Enhancement | Foreground; back drop; add or remove features; maintain features; interpretation features | No information |
| Photographs | 3 photographs per view on longer distant views | One photograph possibly in conservation appraisal |
| Viewer | Pedestrian; travelling in a vehicle; train traveller | Pedestrian |
| Other | Skyline; roofscape; mapped building heights over 5 storeys | Not mentioned in JCS/DMP. Mentioned in the Policies and guidelines of the City Centre Conservation Area appraisal. |

- 3.6 Historic England's former guidance 'History in the View' (2011) has been replaced with 'Historic Environment Good Practice Advice in Planning Note 3 (Second Edition): The Setting of Heritage Assets', 16.12.17. The referencing to NPPF paragraph numbers has yet to be updated, but as the wording of Section 12 which became Section 16 is very little altered this does not have a significant impact on the content of the document.
- 3.7 The Landscape Institute and the Institute of Environmental Management and Assessment in partnership with Historic England produced the Guidelines for Landscape and Visual Impact Assessment, 3rd Ed which includes historic view assessment, although setting of an historic building and landscape views have slightly different considerations.

Summary

- 3.8 The policies for views and skyline management in Norwich are lacking in detail and accuracy, not setting out what and why is it important to consider protecting particular views and how areas within the views might be developed and managed. Without a level of detail and accuracy development opportunities which might exist within these views are potentially being lost.

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- 3.9 Strategic views from out with the City are missing.
 - 3.10 Local views in conservation areas without conservation area appraisals, areas outside conservation areas are missing. Even where the appraisal exists accurate mapping of the view and little discussion result in annotations which have little value to either those trying to protect such views or parts of those views or to those who wish to take the opportunity to enhance or develop within the vicinity of the views.
 - 3.11 The Greater Norwich Local Plan Consultation offers an opportunity to introduce a strategic view policy for the City (and/or other areas).
 - 3.12 The presence of policy DM3 and Appendix 8 in the Development Management Document offers the opportunity to develop a detailed Supplementary Planning Document with accuracy and detail on the basis of the existing policy.

Appendix: Policy Extracts

Policy DM3 – Design principles

Significant weight will be given to the following design principles in assessing development proposals:

a) Gateways

Major development within 100m of the main gateways to the city, as defined on the Policies map, 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. In these locations, particular emphasis will be given to design considerations over other factors.

b) Long views

The design of new buildings must pay careful attention to the need to protect and enhance the significant long views of the major landmarks identified in Appendix 8 and those identified in conservation area appraisals.

Paragraphs:

- 3.6 The gateways identified in this plan are firstly those around the fringe of the city which demarcate the Norwich urban area from the surrounding countryside. Secondly those leading into the city centre assist in welcoming visitors to the centre and signifying its functional importance. The city centre gateways often coincide with the position of historic gateways to the old walled city of Norwich. Gateways may be marked by appropriately designed landmark buildings: for the purposes of this policy a landmark is defined as “a building or structure that stands out from its background by virtue of height, size or some other aspect of design”. However, because of the particularly sensitive townscape of the historic city it is considered that excessively tall or large buildings would be inappropriate in most gateway locations. The expectation of this policy is that gateway sites would be marked by development of exceptionally high quality which relies for its distinctiveness on design aspects other than size and height.
- 3.7 The distinctive topography of Norwich, with its two river valleys and sometimes steep, often wooded valley sides, offers the opportunity for long views across the city from elevated viewpoints. These views contribute greatly to appreciation of the townscape and provide a sense of place. The policy does not seek to protect all views from all places. Rather it seeks to manage and control development which could affect the key long views identified in appendix 8 and those which are identified in conservation area appraisals.

- 3.9** When considering the layout of a site, priority should be given to non-car modes of transport, respecting the needs of pedestrians and cyclists over motor vehicles. This approach will assist in creating an attractive and safe environment for its intended users, and also help to promote sustainable development in accordance with the presumption set out in the NPPF. To comply with policy DM31 and the standards in appendix 3, car parking should not dominate schemes. Public and private open space should also be integral to the design of the development and should be well situated and defined to avoid piecemeal and isolated patches of public space that are not well used and may be prone to vandalism.

Link to Appendix 8:

https://www.norwich.gov.uk/downloads/file/2921/appendix_8_%E2%80%93_long_views_and_strategic_viewpoints_map