



Town and Country Planning Act 1990 – Section 77
Town and County Planning (Inquiries Procedure) (England) Rules 2000

Rebuttal Evidence – Design and Heritage

Site:	Anglia Square including land and buildings to the north and west
Applicant:	Weston Homes PLC and Colombia Threadneedle Investments
Local Planning Authority:	Norwich City Council
Name of witness:	Ben Webster (MRTPI)
PINS reference:	APP/G2625/V/19/3225505
LPA reference:	18/00330/F
Reference:	NCC2/4

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1.0 Introduction

1.1 My rebuttal evidence set out below is brief and highlights some contestable evidence offered by Historic England and SAVE Britain's Heritage. The absence of any rebuttal evidence on a particular matter does not necessarily signify agreement with the evidence offered by those parties.

2.0 Historic England

Consideration of tall buildings

2.1 Historic England (HE) criticise buildings which "rise above the prevailing heights of the historic city" at paragraph 6.77 of their evidence and refer to 32 buildings of six storeys or more across the city in appendix 4. I do not accept that buildings which rise above the prevailing heights of the historic city are necessarily incompatible with Norwich, irrespective of their function, location, relationship with other buildings and architectural quality. I think such a view is also incompatible with the contextual approach to defining tall buildings in HE's own "Tall Buildings Advice Note": *"What might be considered a tall building will vary according to the nature of the local area. A ten-storey building in a mainly two-storey neighbourhood will be thought of as a tall building by those affected, whereas in the centre of a large city it may not. One of the principal failings in the design of certain tall buildings was a lack of understanding of the nature of the area around them, and the impact they would have on both specific features of the historic environment and its general character."* (para 1.2).

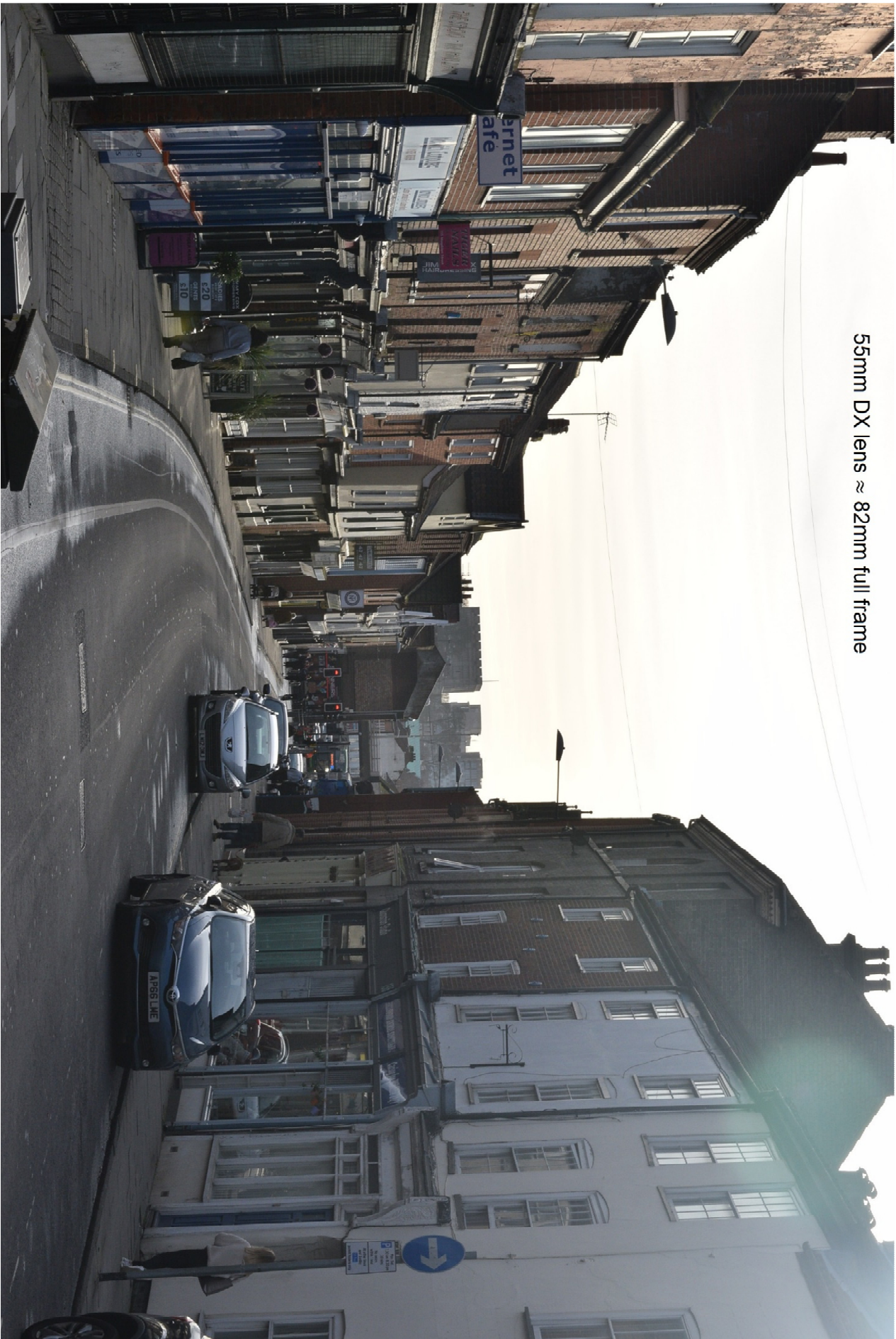
2.2 HE cite a building called Quad / Pablo Fanque House on All Saint's Green for particular comment. The building features in four of the images contained in appendix 5 to HE's proof (images 15, 18, 19 and 20). This building was granted approval in October 2016 following a supportive design review by Design South East. It is indeed a prominent building locally and in a number of long-range views. In contrast with HE, I consider the building to be generally a successful addition to the local townscape and skyline of Norwich as well as providing popular and centrally located student accommodation. It is interestingly modelled and rigorously detailed. Its height and position on

elevated ground celebrates and emphasises the topography of the city and the centrality of the site.

Use of imagery

- 2.3 Image 20 in appendix 5, taken from the northern end of Magdalen Street, typifies the general problem with the images that feature in appendix 5. It is taken with a zoom lens and therefore does not represent the actual experience of a person in the street. The image I have reproduced below is more reflective of what the human eye perceives.

55mm DX lens \approx 82mm full frame



Assessment of harm

- 2.4 The assessment of effects contained appendix 6 to HE's proof provides a point of comparison with the information contained in table 1 of my proof. I have reproduced table 1 as appendix 1 below with four modifications.
- 2.5 Firstly, I have updated some of the asset names so they correspond with the list descriptions.
- 2.6 Secondly, I have amended my judgement on the harm to the significance of Doughty's Hospital from negligible harm to minor harm. I have made this change because I accept the point made by Historic England and SAVE in their proofs that the magnitude of the interference to the sense of seclusion and appreciation of the architecture would be greater when standing in the south-east corner of the courtyard than the centre of the courtyard, as portrayed in view 44.
- 2.7 Thirdly, my careful reading of the HE and Weston proofs on the subject of harm to St Augustine's Church has led me to alter my judgement from negligible to minor harm. The reason for this change is a realisation that I gave:
- a) too little weight to the importance of the historical association of the church and its almshouses and how the new development in the background would undermine that tight pairing by drawing attention to the new development in the background when viewed from the seating area in the north west corner of the churchyard (view 32);
 - b) too much weight to the removal of negative buildings currently on the Anglia Square site because I should have identified that the benefit derived from this is greater when viewed from the porch (view 33) than the rear of the churchyard (view 32).
- 2.8 Fourthly, I wish to include consideration in this rebuttal of the impact on three assets that were not discussed in my proof or the committee report and for completeness I have added them to table 1. Those assets are St Saviour's

Church, Magdalen Street; St James's Church, Whitefriars and St Giles Church, Upper St Giles Street.

- 2.9 The setting of St Saviour's Church is seriously harmed by the nearby flyover, surface car parks and the poor quality of the existing architecture on the Magdalen Street frontage of Anglia Square. I have already explained in the committee report that the replacement buildings proposed for the Magdalen Street frontage will be an improvement and that the effect of taller building, whilst very noticeable, will be lessened by their position deeper into the site. I therefore conclude that there will be negligible benefit to the significance of the heritage asset.
- 2.10 St James' Church (Norwich Puppet Theatre) is over 250 metres from the closest part of the development and its setting is compromised by the presence of the inner ring road. There is a clear view towards the development (view 19) from the gathering space near the porch within the former churchyard. The current buildings on Anglia Square form an awkward-looking collection next to the void formed by the ramp leading up to the flyover spanning Magdalen Street. These would be replaced by a more coherent collection of buildings with the tower lending visual interest, although this benefit is largely cancelled by the bulk of the building that is uncharacteristic of the wider area. I therefore conclude that there would be negligible benefit to the significance of the heritage asset.
- 2.11 St Giles Church, Upper St Giles Street is one of the six city-wide landmark buildings identified in the City Centre Conservation Area Appraisal that contribute to forming the image of the city in longer views. It also provides a focal point within local townscape due to its position at the junction of St Giles Street, Upper St Giles Street, Cleveland Road, Bethel Street and Cow Hill. The discussion in para 2.13 below concerning St Peter Mancroft is also pertinent to the assessment of harm to St Giles Church and, like St Peter Mancroft, I conclude that negligible harm will be caused by the development.

2.12 My assessment of the other assets has not altered as a result of reading the HE proof. Although I have used different terminology for the assessment of impact on heritage significance to HE I am able to discern a divergence of opinion in relation to our assessment of the effect on some heritage assets. The reasons for our disagreement can be seen in the relevant part of the committee report and our proofs and I have opted not to repeat that material here. It should be noted that in the committee report I have focused on the effect of the proposals in particular views of the assets. However, the overall effect has to be considered in the round. For example, I have said that the townscape and visual impact in views 22 and 55 that include St Peter Hungate (among other assets) is moderate-adverse (22) and minor-adverse (55), but as set out in Appendix 1 to this rebuttal I think the overall impact on the significance of this asset is negligible.

2.13 I would like to make some brief observations about impacts on City Hall and St Peter Mancroft, due to their important contribution to the image of the city. HE offers a more critical assessment of harm to the significance of City Hall (“considerable harm”) and St Peter Mancroft (“marked harm”) than I do. This is, at least in part, because they consider the scheme’s effect on these assets from distant vantage points, such as Mottram Monument (view 8), to be more problematic. I have made it clear in my evidence that I think the scheme will diminish the prominence of these buildings to some degree through the distracting effect of a striking new building of a different character appearing in the north of the city centre away from the present cluster of landmark buildings. Notwithstanding this, I think that HE overstate the harm to City Hall and St Peter Mancroft because:

- they would continue to be the focus of the view as part of the central cluster of heritage assets with landmark status,
- the landmark buildings are not physically obscured by the development, which is some distance away in this view, and
- people will not be aware of any harmful effect from the new development on City Hall and St Peter Mancroft in most of the other views that comprise its visual setting, whether featured in the verified views that support the

application or not (e.g. the view of City Hall from Wensum Park that is protected through policy DM3 and appendix 8 of the Norwich Local Plan)¹.

Choice of viewpoint

- 2.14 Part of the reason for HE's more negative assessment (and even more so that of SAVE) of the impact on certain assets may result from their assertion that some of the viewpoints in the verified views present a more flattering portrait of the scheme than would have been the case if positions nearby had been selected. I proposed most of the viewpoints and tried to exhaustively identify those places where the scheme would be viewed most clearly and starkly in relation to heritage assets, taking into account the degree of public access, those viewpoints that were recognised in policy as being especially important and requests from stakeholders (including HE) who had particular concerns. Of course it is true that views are kinetic and change as one moves through the townscape, but I think the views chosen fairly represent the impact.
- 2.15 Two views from Catton Park in the north of the city have been included amongst the verified views (61 and 62). These were identified at a site visit on 19 June 2018 that included myself and a representative of Broadland District Council. In revisiting the site on 10 January 2020, when there were no leaves on the trees, I noticed that the Anglican Cathedral spire could be seen from a different position at the northern edge of the park. I am certain that this view of the Cathedral would not be blocked by the development due to its alignment to the right of this vista towards to Cathedral. Furthermore, considering the wireline profile of the development in views 61 and 62, which are taken from the same elevation as the position where I observed the Cathedral, I am confident that if any part of the tower is visible in association with the Cathedral it would form a much less prominent component of the scene than the Cathedral.

3.0 SAVE Britain's Heritage

- 3.1 SAVE refer in para 11 to the continuing efforts of HEART to gain World Heritage Site status for Norwich. Unfortunately, its efforts to achieve this status failed and HEART ceased to exist several years ago.
- 3.2 Our position regarding the tower is criticised as ambivalent and confused in para 38. I do not accept the criticism. Instead, I think the Council has correctly and appropriately weighted the arguments in favour and against building this tower in this location. This is a mature and sensible stance and should not be criticised as confused.
- 3.3 I would take issue with several statements made in the section concerning the impact on particular heritage assets. No acknowledgement is made in paragraphs 46-47 of the benefit to St Augustine's Church or 2-12 Gildencroft from removing the surface car parks and the decaying buildings of Sovereign House and the multi-storey car park that currently blight the setting of these buildings or the creation of a dramatic new view of the church from within the development. The setting of St Mary's Church is described as being completely unspoiled by taller buildings in para 49. I do not agree, given that St Crispin's House is on the other side of Duke Street and rises to five / six storeys, with permission for extra floors (see the yellow lines on verified views denoting cumulative effects). Para 52 says that the northern character area will be physically cut off from the rest of the city to the south by the development. This is incorrect given that St George's Street will be extended to connect with Edward Street, forming a strong cycling and walking connection, whereas one currently has to walk through a car park and climb over barriers.
- 3.4 I note that SAVE contend that the scheme causes substantial harm (para 60). This is of course a matter of judgement, but I note Historic England's approach where they accept that less than substantial harm would result. As the Planning Practice Guidance states² substantial harm is a high test. Neither I nor HE think that test is met in this case. I think HE generally take a

more balanced view of the case, for example conceding (eg at paragraph 8.13 of their evidence) in contrast to SAVE (at paragraphs 83-90) some benefit from the proposals for the heritage of the city..

- 3.5 The question of whether the historic street pattern has been satisfactorily reinstated is erroneously conflated in para 86 of SAVE's proof with the question of whether the desire line between Pitt Street and Cowgate has been achieved. There has never been an effective pedestrian link between Pitt Street and Cowgate. If the current scheme had created one it would have been an additional asset but not one guided by historical precedent.
- 3.6 SAVE place considerable weight in their proof on the alternative visions of development drawn up by HE's consultants and by the Cathedral Magdalen & St Augustine's Forum (SAVE proof paras 101-114). Whatever the merits of these visions from a design and heritage point of view, it is crucial to note that their economic viability is not proven. In fact, HE acknowledge that their vision is not viable (HE proof para. 10.13) which undermines SAVE's assertion to the contrary in para 110 of their proof. The reference in para 112 to the Stirling Prize winning Goldsmith Street development is of limited relevance because it is a development entirely composed of housing with no shop or major public spaces whereas Anglia Square should be a mixed use development with public spaces, befitting its status as a major district centre.

Appendix 1

Main Heritage Assets	Properties in group (exc local list)	Listing grade	Relevant views	Impact on significance
Cathedral of the Holy and Undivided Trinity		I	7A, 8, 9, 14, 15, 20, 48, 49, 58, 60	Moderate harm
St Helen's Church, Great Hospital, Bishopsgate		I	58, 60	Minor harm
Waterloo Park		RHPG II*	48	Minor harm
Cathedral of St. John the Baptist, Earlham Road		I	7, 7A, 8, 9	Moderate harm
45-51 London Street, Former Nat West Bank		II	12, 54	Moderate harm
Norwich Castle		I, SAM	8, 9, 12, 54	Minor harm
St Andrew's Church, St Andrew's Street		I	12, 54	Minor harm
City Hall, including Police Station, Bethel and St. Peter's Streets		II*	8, 9, 11, 53	Minor harm
Church of St Peter Mancroft, St Peter's Street		I	8, 9, 11	Negligible harm
The Guildhall, Guildhall Hill		I	11	Minor harm
1 Guildhall Hill		II	11	Minor harm
St Andrews and Blackfriars Halls, St Andrew's Plain		I, SAM	22, 55	Minor harm
St Peter Hungate, Princes Street		I	22, 55	Negligible harm
The Britons Arms, Elm Hill		II*	22, 55	Negligible harm
Elm Hill group	Nos 2-4, 6-8			
St Augustine's Street group	Nos 1-3, 5, 7, 9 and 11, Rear of 13 and 15, 21, 23 and 25, 26-30, 27-29, 32, 34 and 36A, 42-52, 55, The Catherine Wheel PH; 71 Botolph Street	Various	15, 16	Major harm
St Augustine's Church		I	32, 33	Minor harm
2-12 Gildencroft		II	32, 33	Minor harm
City Wall (Magpie Road)		SAM	17	Minor harm
Upper Close (northern group)	Nos 69, 70; Carnary Chapel, The Close; Erpingham Gate	Various	20	Negligible harm
Maids Head Hotel, Tombland		II	23	Minor harm
St Clements Church, Colegate		I	25, 27, 56	Major harm
Fye Bridge Street group	Nos 2, 7-9, 11-15; The Mischief Tavern, 8 Fye Bridge Street; Fye Bridge; 3 Colegate	Various	25, 27, 56	Major harm
Wensum Street group	11-13 Wensum Street; 40 Elm Hill	Various	25	Major harm
Church at St Martin at Oak, Oak Street		I	29	Minor harm
Folly House and Pineapple House 47-49 St Martin's Lane		II	29	Moderate harm
St George's Street group	Nos 63, 80 and 82; St George's Church, Colegate; Bacon's House, Colegate	Various	37	Minor harm
Calvert Street group	Nos 9, 11, 20, 22; 2-9 Octagon Court; 27 and 29 Colegate	Various	38	Minor benefit
42-48 Magdalen Street group	Nos 44, 46 and 48; Kings Head PH	Various	42	Negligible benefit
Magdalen Street (centre and north)	Nos. 75, 105, 107-109, 113, 115-117,	II	34, 43	Major benefit
Doughty's Hospital, Golden Dog Lane		II	44	Minor harm
43-45 Pitt Street		Local	30, 46	Total loss
St Mary's Church, St Mary's Plain		I	52	Negligible harm
Pykerell's House		II*	52	Negligible harm
69-89 Duke Street		II	52	Negligible harm
St Saviour's Church, Magdalen Street		I	42, 43	Negligible benefit
St James' Church, Whitefriars		I	19	Negligible benefit
St Giles' Church, Upper St. Giles Street		I	8, 9	Negligible harm
City Centre Conservation Area		NA	All	Minor-Moderate harm