

DOCUMENT REF: WH 1 / 4

ANGLIA SQUARE, NORWICH

**EXPERT EVIDENCE TO THE PUBLIC INQUIRY
UNDER SECTION 77 OF THE TOWN AND COUNTRY
PLANNING ACT 1990**

**Applicant: Weston Homes and Columbia
Threadneedle Investments**

**Peter Vaughan BA (Hons) Dip Arch RIBA
Broadway Malyan**

**Rebuttal Proof of Evidence –
Response to Norwich Society – Jon Boon (NS1)
"Building for Life" Assessment**

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Broadway Malyan
Holmes House
4 Pear Place
London SE1 8BT

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REBUTTAL: Norwich Society, Building for Life 12

Introduction

This Rebuttal Proof has been prepared by Peter Vaughan. It addresses the following Rule 6 Party documents:

The Norwich Society: Jon Boon Proof of Evidence (NS1)

The Norwich Society: Jon Boon's Building for Life assessment (NS1 /3)

I have specifically relied on Building for Life 12, 2018 Edition (CD 11.20 (a)) and additional supporting CGI architectural images which will be submitted to the Inspector on 20 January 2020. These have been prepared in response to comments made by other parties.

Assessment Strategy

- 1.1. I acknowledge that it is appropriate for NS's urban design assessment of the application proposals to use the Building for Life (BfL) assessment, however I disagree with the approach, since NS has expanded the scope of the scoring system beyond that recommended by BfL. I will explain my reasoning for this below, but I also disagree with the NS scores of the resultant expanded number of questions, which I will address following the issue of the expanded scope. My own scores for the BfL 12 questions are set out in the Statement of Common Ground.
- 1.2. The scope of the assessment should be based on Page 11 of BfL, '*How to use BfL*'. (CD11.20A)
- 1.3. Para 1 states;
BfL 12's questions were created to help designers and non-designers to work better together and create better places. BfL 12 is primarily a discussion tool – a framework around which issues and ideas can be explored.
- 1.4. BfL's scoring system relies on a balanced view of how the development proposals respond to each of the main questions and sub-questions, although I note that NS refer to the sub-questions as '*sub sections*'.
- 1.5. Para 2 states, '*.....a 'red' indicator suggests that one or more aspects of the design need to be considered; 'ambers' indicate a need for further discussion or refinement. 'Green' indicators suggest one or more aspects of a scheme have been well considered and resolved*'. Therefore BfL does not demand a '*precise result*' and relies on a score system based on a maximum of 12 '*indicators*'.
- 1.6. Page 9, Para 3 expands on the scoring strategy and states;
'Part of Building for Life is about recognising good practice and enabling developers that perform well against the 12 questions to demonstrate their commitment to good design'Any new development that secures at least nine 'green' indicators against the twelve questions are eligible to apply for a Built for Life™ quality mark'.

Why nine out of twelve?

At times there are circumstances beyond the control of a developer that will mean it is not possible to secure a full complement of twelve 'green' indicators. These will normally only be justified in the first section of Building for Life 12, i.e. 'Integrating into the neighbourhood'.

Developments that secure all twelve 'green' indicators are eligible to apply for a Built for Life™ 'Outstanding' quality mark. The process of applying for a quality mark is

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simple. To be considered for a quality mark a development must have secured planning permission.

- 1.7. I now comment on Jon Boom's PoE (NS1). Page 2, Para 3 states, '*I should clarify that I have taken a more detailed appraisal by scoring each sub-section of the 12 questions, making 29 in total.*
- 1.8. The *How to use BfL* framework helps to guide development teams to consider 12 key questions based on 3 core areas;
- Integrating into the neighbourhood
 - Creating a place
 - Street and home

Each of the 12 questions comprise 2, 3 or 4 sub-questions which I have noted NS refer to as 'sub-sections' which I shall use for consistency. In addition to the 12 main questions there are a total of 35 sub-sections not 29 as stated by NS. The intended methodology is to assess each group of sub-sections within each main question and arrive at an overall score for each of the 12 main questions.

- 1.9 In addition, Questions 1, 2, 6, 8, and 11 also include a further layer or sub-section, e.g. Question 2, sub section '2c' states, '*Are these new facilities located in the right place? If not, where should they go?*' This in any event represents a single sub-section.
- 1.10 The scoring ethos of BfL is further expanded upon on page 47; '*whilst we encourage local authorities to adopt BfL12, we strongly recommend that they avoid explicitly setting a requirement for every proposed development to achieve 12 'greens'. Instead, we recommend local policies to refer all proposed developments to use BfL12 as a design tool throughout the pre-application and community engagement stages. Rather than local policies requiring all schemes to achieve 12 'greens', local policies should require all proposed developments to perform positively against BfL12 with the maximum number of 'greens' secured, with 'reds' avoided and 'ambers' well justified.*
- 2.0 Below, I respond to the detailed assessment provided by NS; ref; BUILDING FOR LIFE ASSESSMENT (BfL12:2018 edition) **NS/2/1/1**
I have responded to the points NS disagree with in relation to the score provided by NCC in their Urban Design Evaluation in their Committee Report (CD9.1) Paras 315 – 359 and which were set out in the Statement of Common Ground under Main Issue 7: Design and Heritage, (8 Green & 4 Amber).

2.1 Integrating into the Neighbourhood

Question 1. Connections

I direct the inspector to my PoE, (WH 1/1), Page 104 items 1.1 – 1.10 setting out my response to BfL Question 1.

Question 1a

Where should vehicles come in and out of the development?

NCC score AMBER

NS score RED

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2.2 Norwich Society state;
'The delivery/service layby (11), car park entrance for hotel and residents (12), and taxi rank (14) are all located on Pitt Street to the west of the site. This gyratory is already congested, especially at rush hour, and we are concerned at this huge increase in traffic movements'.

2.3 The statement is incorrect, since in addition to the laybys on Pitt Street / New Botolph Street,, taxi ranks and drop-off zones are also included at the eastern end of Edward Street, adjoining the northern boundary of Anglia Square. Taxi laybys and drop-off zones are further illustrated in CGi 01 Edward Street looking south, and CGi 02, Edward Street looking west.

2.4 NCC's Committee Report (CD 9.1) para 315 states: *The scheme is judged to receive an **amber** rating because the connections are good but the scale does not respond well to its surroundings for the reasons explained below and in response to question five on character.* I believe NCC has adopted a balanced view in this assessment and I agree with an amber score.

2.5 The guidance within BfL 2018, recommends that the scope is confined to;

Thinking about where connections can and should be made; and about how best the new development can integrate into the existing neighbourhood rather than creating an inward looking cul-de-sac development.

Remembering that people who live within a new development and people who live nearby may want to walk through the development to get somewhere else, so carefully consider how a development can contribute towards creating a more walkable neighbourhood.

Thinking carefully before blocking or redirecting existing routes, particularly where these are well used. Carefully consider connectivity around the edges of the development, bearing in mind that a network of private drives can frustrate and block pedestrian and cycle movement.

Creating a network of connections that are attractive, well lit, direct, easy to navigate, well overlooked and safe. Bear in mind that a pedestrian or cycle way through an open space may be attractive as a route during daylight hours, but less so early in the evening during winter.

Ensuring that all street, pedestrian and cycle only routes pass in front of people's homes, rather than to the back of them.

2.6 NS refers to Para 320 -323 of the Committee Report (CD9.1) which describes improvements to the quality of the existing edges of the site, particularly the introduction of active frontages, increased widths of footpaths, hard landscape and planting, all of which improves the pedestrian flow and character of the existing streets.

2.7 Question 1a is focused on where vehicles come in and out of the development. The access and service strategy for the development has been developed in dialogue with NCC and NCoC. All vehicular movement is maintained within the existing road infrastructure. Entrances to parking and delivery areas have been carefully designed and this is covered in the Transport Addendum, (TA) prepared by WSP, ref.R002 r06a, (CD 4.86 (g)) and TA Addendum (CD 7.81 (r)).

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- 2.8 The development offers a choice for the north-south route running from Edward Street north of the site to St George's Street south of the site as to whether to use the new shared pedestrian and cycle shared route on the western and southern edges, (New Botolph Street, Pitt Street and St Crispin's Road), or the new vehicle-free shared north-south St George's Street through the scheme. In addition, for the east-west route between St Augustine's Street and Magdalen Street there will be a significantly improved east-west vehicle-free shared route via the new Botolph Street leading to Sovereign Way.
- 2.9 New access points or lay-bys will not hinder or undermine existing traffic flow. Vehicle access is addressed at Section 6.2 of the TA (CD 4.86 (g)). Access via Pitt Street is minimised to one entrance to serve the car park to the western residential / hotel / commercial block (E & F), and one part time access to Botolph Street to provide controlled service access outside of a core period. The proposed residential / hotel / commercial access is left in/out, which is safe and eliminates conflicting movements in a similar manner to the existing arrangements which currently serve the 'at grade' parking areas.
- 2.10 Sections 7.4 and 7.7 of the TA address traffic growth and vehicle trip generation respectively. Section 8 of the TA addresses the impact of the development and explains at paragraph 8.1.13 how the traffic signal control at the junction of the New Botolph Street/Pitt Street/St Augustine's Street will be modified to improve the free flow of traffic.
- 2.11 The overall level of mitigation to accommodate the anticipated future trip demand is detailed in Section 9 of the TA and its Addendum. The extent and design of the access points, laybys and shared pedestrian and cyclist routes, as well as the impact on the highway network has been agreed with Norfolk County Council and Norwich City Council and are accepted as being appropriate, proportionate and safe, in accordance with the National Planning Policy Framework (NPPF) paras 17 and 39, and development plan policies JCS6, DM28 and DM30, as set out in Committee Report (CD9.1) Main Issue 10: *Transport*.

3.0 Question 1c

Where should new streets be placed, could they be used to cross the development site and help create linkages across the scheme and into the existing neighbourhood and surrounding places?

NCC score AMBER

NS score RED

- 3.1 NS state, '*Although the scheme reinstates 2 important connections – St George's Street and Botolph Street – it removes Ann's Walk, an existing pedestrian route between Cowgate and Pitt Street. The arguments justifying this in the report are unsustainable; the design could and should have been reworked to encourage this and other pedestrian routes through the site. As the report states: 'If such a secondary connection had been provided it would have given the development greater permeability and a layout more in keeping with the intricate street pattern elsewhere in the city centre'.*

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- 3.2 NS support the movement strategy across the site, their argument to reinstate Anne's Walk to replace the existing route from Cowgate to Pitt Street seems contrived.
- 3.3 Currently Anne's Walk is not the only pedestrian link between Cowgate and Pitt Street. Edward Street currently provides a more direct route, although currently neither provide a safe or desirable route given their existing character. My CGI 02, Edward Street view looking east, demonstrates a much improved public realm in Edward Street together with new residential frontages and greater pedestrian activity generated by the new residential entrances and the discounted commercial units, as well as the relocated Surrey Chapel, this connection from Cowgate to Pitt Street will be significantly improved.
- 3.4 NS suggest Pitt Street as a destination, although I would suggest the primary destination opposite the application site along this road is Gildencroft Park, which would be conveniently accessed via the alignment of the newly recreated Botolph Street and the existing pedestrian crossing at New Botolph Street / St Augustine's Street.
- 3.5 The application scheme would also widen the pavement on Magdalen Street along the scheme frontage as demonstrated on my CGI 04 Magdalen Street view. This will be a more attractive route from the vicinity of Cowgate to Sovereign Way, which itself will be widened and landscaped with the removal of the oversailing current cinema. The improved second route to Pitt Street would present a more attractive, vibrant and safe route via Anglia Square and Botolph Street.
- 3.6 In contrast, the integration of a secondary connection to replace Anne's Walk would compromise the improved legibility, hierarchy and desire line from Magdalen Street and importantly, compromise the delivery of a large food store and its serviceability in a location where it would act as an anchor for the shops and services in both the new Anglia Square and on Magdalen Street.

4.0 Question 1d

How should the new development relate to existing development? What should happen at the edges of the development site?

NCC score AMBER

NS score RED

- 4.1 NS state, '*This is one of the major areas of concern from the Norwich Society, and much of the harmful impact has been picked up in the Committee report....*'.
- 4.2 Whilst I acknowledge the assessment provided by NS, which they admit is a summary of the NCC committee report, I disagree with the score established by NS. In my view this fails to establish a 'balanced view' in terms of planning policy.
- 4.3 I have set out, on Page 104 Item 1.11 of my PoE (WH1/1), in a response to Question 1d, how the design process established a clear direction on scale and mass and character through dialogue with stakeholders. The impact on the immediate heritage and the wider townscape has been extensively tested through a study of the immediate context and the special heritage assets in the wider context of the City. The heritage impact is covered in Dr Chris Miele's PoE (WH 2 /1) and I refer to this in relation to the concerns regarding 'harmful impact'.

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4.4 Nevertheless, I agree with the council's assessment (CD9.1) at Para 605, '*Conclusions and striking the planning balance*' of the planning report which concludes, '*In this case it is considered that the submitted scheme if built will have a significant regenerative effect on the northern city centre. It is considered that the case for the tower to be provided as a landmark building to mark a stepped change in the role of this part of the city centre has been made, the scheme delivers on a significant number of planning objectives and policies for the site and the level of economic and social benefits which would result from the development, which is considered to be the optimum viable use for the site, are considered in these exceptional circumstances to outweigh the harm that would arise from the development particularly to the setting of many of the existing historic landmarks in the city. For this reason approval of the scheme is recommended*'.

5.0 Question 2 Facilities and services

Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes?

5.1 I direct the Inspector to my PoE (WH1/1), Page 105 items 2.1 – 2.5 which set out a response to BfL Question 2.

5.2 Question 2b

Are these facilities what the area needs?

NCC score GREEN

NS score AMBER

5.3 NS state, '*The concern is the extent to which the existing speciality shops and arts/crafts-related workshops etc. will be supported and can survive within the new retail environment*'.

5.4 The development will create a unique retail and leisure offer reflecting the role and function of Anglia Square as the major element of the Large District Centre incorporating on Magdalen Street, and St Augustine's Street serving the needs of the local community and new residents.

5.5 I disagree with the 'amber' rating and consider that a 'green' rating is justified for the following reasons:

- i. The scheme will comprise up to 11,000 sqm of ground floor flexible commercial floorspace (including use classes A1/A2/A3/A4/B1/D1/Sui Generis). Of this floorspace, it is a S106 obligation that 1,150 sqm will be discounted commercial floorspace for SMEs and start-ups i.e. suitable for arts/crafts-related workshops, social enterprises, etc. The s.106 ensures that SMEs within the existing Anglia Square buildings will have first refusal of the discounted accommodation.
- ii. All existing tenants within the shopping centre will be given the opportunity to agree commercial terms with the landlord (CT) for replacement accommodation. As stated in the Retail Strategy Report: Revision A (CD7.7), CT will seek to retain as many as possible existing tenants within the scheme. That the proposed development will be phased ensures CT will be able to relocate tenants around the scheme as and when each phase is brought forward.

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- iii. Commercial market rents will be cognisant of the rental levels achieved in Norwich, and not significantly higher than the existing Anglia Square shopping centre or its surrounding area [FT proof WH3/3, para 8.16 of Appendix 1].
- iv. Planning permission has been secured for the 'Under the Flyover' meanwhile use comprising flexible, low cost space (including use classes A1/A3/A4/A5/B1). The delivery of this scheme or an agreed alternative is a S106 obligation.
- v. Subject to agreement of lease terms, the artists in Gildengate House will have several years (at sub market rental) to find alternative accommodation [CW proof WH6/1, para 4.11].
- vi. A new 'changing places' facility for those who cannot use standard accessible public toilets is integrated in the development.

6.0 Question 3 Public transport

Does the scheme have good access to public transport to help reduce car dependency?

6.1 Question 3a

What can the development do to encourage more people (both existing and new residents) to use public transport more often?

NCC score GREEN

NS score RED

6.2 I disagree with the RED rating for the following reasons.

6.3 NS state, '*The site is very well served by public transport and close to the City centre amenities. We therefore consider that the 72.8% parking provision for residents is excessive. Similar residential schemes in the city centre have a 50% provision. We do not understand why only 75% of the required residential cycle parking is proposed, as a maximum. If the Council is serious about carbon reduction, new schemes should aim to reduce car use in the City centre through promoting park-and-ride and public transport. We consider that the 600 public parking spaces should therefore be reconsidered*'.

6.4 Residents of the new development would enjoy very good access to bus services from Magdalen Street, as all buses from the City centre serving the northern part of the City travel through Magdalen Street. The mainline station is within walking distance from the site, therefore the site is well served by public transport.

6.5 The approach for cycle parking is set out in the DAS, page 144, and the approach has been adopted based on consultation with NCC and NCoC. The strategy provides just over 1 space per dwelling, representing 75% of the required provision, although bike storage ratio is to be monitored and any necessary increase in ratio to be included in later phases, all controlled by a proposed condition. NCC and NCoC acknowledge that the provision is slightly below that required by Policy, however, '*.....in the event of planning permission being approved it is recommended that bike store usage is monitored in the early stages allowing the scope for storage in later phases to be designed to meet expected demand*'. Para 492 NCC Committee Report (CD9.1).

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6.6 In addition;

- Provision is made for 7 parking spaces for a car club, 5 on Edward St, and 2 more to be decided by NCC, and a s106 payment of £115k to set it up. – refer to WSP's TA ref.R002 r06a. Refer to my CGi 02, Edward Street view looking east, which demonstrated the layby on the centre of the image.
- Space has also been indicated for electric charging points for a proportion of the parking, and fast chargers available for all other residents to use when needed, so that all the residential car parks will provide for the potential for 100% EVs.

7.0 Question 5 Character

Does the scheme create a place with a locally inspired or otherwise distinctive character?

7.1 I direct the Inspector to refer to my PoE (WH1/1), Page 106 items 5.1 – 5.8 which set out a response to BfL Question 5.

7.2 Question 5a

How can the development be designed to have a local or distinctive identity?

NCC score AMBER

NS score RED

7.3 NS state, '*In our view, this development is not distinctive from other similar developments elsewhere, e.g. Canary Wharf, and does not have any local identity. We therefore have given it a red rating*'.

7.4 I reject the suggestion of the design being non-descript/or lacking local identity. The proposed development creates a bespoke scheme of particular character in response to location, heritage, and materiality. NS fail to recognise that the scheme is presented as a hybrid application, so primarily an outline application with only the proposed tower and Block A in detail. The level of design for the outline establishes key parameters and will be subject to detail design development, and ultimately approval of Reserved Matters, which will ensure it meets this criteria.

7.5 There are many recent developments approved and constructed in the City, on which NS will have been consulted, and are located in close proximity to important heritage buildings. For example, modern structures such as the M+S building on Rampant Horse Street sits comfortably directly opposite the medieval St Stephen's Church; and more recently, Pablo Fanque House in All Saints which reflects a very contemporary simple brick structure lacking any distinctive features that can be associated with the City's fabric.

7.6 NCC Committee Report (CD9.1) Para 340, acknowledges that, '*.....a case can be made to legitimately establish a new identity for the Anglia Square character area given its current condition, the size of the site, the disparate nature of its surroundings and the potential to add to the variety of the city's development typologies and experiences*'.

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7.7 The DAS Page 94 – 119 sets out the rationale for the character and materiality of this modern development and this is further explained in section 4 of my PoE (WH1/1). I acknowledge Norwich comprises a range of traditional materials, e.g brick, flint, stone, render/stucco, etc. however the proposed development does not slavishly adopt all of these. BfL guidance also recommends that, *'Distinctiveness can also be delivered through new designs that respond to local characteristics in a contemporary way'*.

8.0 Question 5b

Are there any distinctive characteristics within the area, such as building shapes, styles, colours and materials or the character of streets and spaces that the development should draw inspiration from?

NCC score AMBER

NS score RED

I disagree with NS rating this RED.

8.1 Brick is used widely in the locality, and therefore the development's strategy adopts brick as the core material for the first phase. The DAS Page 94 – 119 sets out the rationale for the character and materiality of this modern development and this is further explained in section 4 of my PoE (WH1/1).

8.3 We recognise the use of stone banding on some large buildings although there are other large structures, e.g. University of Arts buildings, that are entirely constructed of a single material including detailed features.

8.4 The design distinguishes the various buildings within the development, e.g. the Tower by its form and height is distinctive from the rest of the development and the locality. The rationale for this has been set out in my PoE (WH1/1). Whilst brick is retained as the main material for this building, its expression and the use of slender piers creates the distinction we intended.

9.0 Question 6 Working with the site and its context

Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates?

9.1 I direct the Inspector to my PoE (WH1/1), Page 107 items 6.1 – 6.4 which set out a response to BfL Question 6.

9.2 Question 6a

Are there any views into or from the site that need to be carefully considered?

NCC score GREEN

NS score RED

I disagree with NS rating this RED.

9.3 NS state, *'A major concern of the Norwich Society is the impact on the views of the development from elsewhere in the City, in particular from the 63 designated view-points described in the Built Heritage Statement. These are reviewed in more detail in the main paper, but the number of adverse impacts of both the tower and the main body of development result in a red rating'*.

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- 9.4 In their assessment NS1, NS consider that all views of the Proposed Development have an adverse impact. This includes the 63 views tested and analysed in the TVIA. I refer to Dr Miele's evidence on heritage and townscape impact, (WH 2/1) and agree with his assessment that, whilst there are some adverse impacts, not all of the views are so categorised.
- 9.5 The 63 view points in the TVIA were identified and agreed with NCC, and HE as part of the consultation process.
- 9.6 As part of Dr Miele's evidence, a Zone of Visual Influences has been prepared which demonstrates that visibility of the Proposed Development from the core of the city to the south is very limited.
- 9.7 The site layout and design takes full advantage of the views out of the site, setting up a clear vista towards St Augustine's Church, and also importantly a view from the new main square towards Norwich Cathedral. The improvements to Sovereign Way and new street patterns make possible the visual connectivity into the site.

10.0 Question 6c

Should the development keep any existing building(s) on the site? If so, how could they be used?

NCC score GREEN

NS score AMBER

- 10.1 NS state, *'Most of the existing buildings on the site would be demolished, however this unfortunately includes the locally listed buildings at 43-45 Pitt Street. Surry Chapel is also due to be demolished and re-provided off site; it would save £2m if this was retained as part of the proposals'*.
- 10.2 The principle of the redevelopment is generally supported and the removal of the dilapidated existing buildings which blight the site is welcomed.
- 10.3 The loss of Surrey Chapel and removal of the locally listed buildings, 43-45 Pitt Street has already been approved in a previous planning permission. Their removal supports the urban design strategy which provides a suitably scaled building on this major corner of St Crispin's Road and Pitt Street.
- 10.4 The removal of Surrey Chapel is appropriate: replacing this non-descript building in a prominent location with a substantial building would enable the creation of an arrival space and a gateway building reinforcing the north-south connection over the new pedestrian crossing on St Crispin's Road.
- 10.5 Also its replacement with a bespoke facility on Edward Street away from a busy main road is a significant benefit. The new location is an appropriate setting surrounded on two sides by residential buildings and set within a pedestrian friendly public realm. My CGi 02, Edward Street view looking east, shows a partial view of the initial design of this building.
- 10.6 I acknowledge and agree with the NCC statement in Para 424 of the Committee Report (CD9.1), *'The justification for the loss of this non-designated heritage asset made in paragraphs 3.47-3.49 of the Addendum to the Built Heritage Statement are accepted...'*

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10.7 We therefore disagree with NS score of AMBER rating.

11.0 Question 7 Creating well defined streets and spaces

Are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well?

11.1 I direct the Inspector to my PoE (WH1/1), Page 108 items 7.1 – 7.7 which set out a response to BfL Question 7.

11.2 Question 7a

Good streets and spaces are created by enclosing them with buildings and a strong landscaping scheme. Are buildings used to create enclosed streets and spaces?

NCC score GREEN

NS score RED

I disagree with NS rating this RED.

11.3 NS state, *'We are concerned that some of the streets feel cavernous – particularly sections 1 and 7 from DAS. This is a direct consequence of the very high density of the scheme.'*

11.4 *We agree with the comments in the report that the buildings surrounding Anglia Square and Sovereign Way will be oddly proportioned as a group, with 6-11 storeys on one side and just two on the other. The view of the Cathedral will be better enhanced by gaps and viewpoints through the buildings rather than skewed views over'.*

11.5 I refer the Inspector to my PoE (WH1/1), Page 108, from which I quote paras 7.6 and 7.7 below;

'7.6 Buildings range in height from 2 to 12 storeys with the tower at 20 storeys. Landscaped street widths are generous and commensurate to the buildings' scale, with widths of between 10m and 18m. St. George's Square and Anglia Square are significantly larger at 29m x 72m and 43m x 33m respectively. The squares are successfully defined by the taller buildings that enclose them and in the case of the larger St. George's Square scaled to sustain the tower'.

7.7 The clearly defined streets and spaces frame the new views that have been created to both the Anglican Cathedral and St. Augustine's Church'.

11.6 Para 347 of the NCC Committee Report (CD9.1) states, *'The proposed streets are very well defined by the adjacent buildings and planting within the streets and are not subservient to carriageway alignments'.*

11.7 Furthermore Page 119 of my PoE (WH1/1) refers to the technical section of the DAS where page 121 sets out the daylight and sun-path study. The report prepared by Calford Seaden concludes that overall the scheme demonstrates careful attention to daylight and sunlight requirements, and having due consideration to the nature of urban development. It notes that this scheme causes limited impact on existing surrounding dwellings whilst achieving generally positive results within the proposed development.

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12.0 Question 7b

Good streets and spaces are created by enclosing them with buildings and a strong landscaping scheme. Are buildings used to create enclosed streets and spaces?

NCC score GREEN

NS score AMBER

12.1 The GREEN rating should be retained. NS do not provide a clear rationale why they reduce the score on this question, as they state, *'No comment at this stage'*.

12.2 Question 7c

Do all fronts of buildings, including front doors, face the street?

12.3 NS state, *'Yes, but at the cost of very long single-sided corridors to access the individual flats from the stair cores – sometimes 13-14 flats between stairs, which will feel oppressive'*.

12.4 Question 7c is more focused on new housing in a suburban development, although is relevant to this site. With commercial uses occupying the ground floor, attractive and well defined residential entrances are incorporated along the commercial frontages. Page 117 of the DAS provides the location of these and illustrates that they can be accessed directly from the streets and the two squares.

12.5 NS has focused their response on the internal environment of the residential corridors especially where these back on to the proposed car parking. The functional quality of internal corridors is governed by Building Regulation. This does not form an integral part of the BfL assessment or indeed Question 7c.

The score here should remain GREEN.

12.5 In any event, a drawing is included on page 18 of this rebuttal which shows a typical residential floor plan, identifying the location of each residential core and the maximum number of apartments served on each floor between any lift lobby and a fire door which would define the end of a corridor accessed from that core only.

12.6 I focus my response in relation to Block A, which also comprises a significant public carpark. The proposed residential cores have been carefully located to ensure these achieve the require function for fire escape, without compromising the commercial environment on the ground floor.

12.7 The corridors comply with fire and Building Regulations. The introduction of fire doors to lift lobbies will ensure that no more than 10 units are accessed from a single core, and also reduce the length of the circulation areas. All residents would only have fob access to one ground level entrance door and associated core, and so would be able to become familiar with the limited number of other residents just using that core and their corridor.

13.0 Question 9 Streets for all

Are streets designed in a way that encourage low vehicle speeds and allow them to function as social spaces?

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13.1 I direct the Inspector to my PoE (WH1/1), Page 110 items 9.0 – 9.5 which set out a response to BfL Question 9.

13.2 Question 9a

Are streets pedestrian friendly and are they designed to encourage cars to drive slower and more carefully?

NCC score GREEN

NS score AMBER

I disagree with the NS Amber rating.

13.3 NS state, '*There is no vehicular access to the development therefore this is acceptable. However we refer to 7a, where we are concerned that some of the streets will feel cavernous and oppressive due to their width:height ratio*'.

13.4 The GREEN rating should be retained. The question is about pedestrian friendly streets not character of the street. NS has incorrectly extended the scope of the question. I also refer the Inspector to my response above to Question 7 of the BfL in para 11.0 – 11.7.

14.0 Question 9b

Are streets designed in a way that they can be used as social spaces, such as places for children to play safely?

NCC score GREEN

NS score AMBER

I disagree with the NS Amber rating

14.1 NS state, '*As most of the street frontages have commercial use, there are limited opportunities for play; apart from a water feature within Anglia Square, the proposals are limited to improving connections to nearby play spaces, viz. Leonards Street playground, and Gildencroft Park through a better crossing point over Pitt Street*'.

14.2 The Landscape Strategy, ref. PL1581-ID-001-01 (CD 4.92) included in the planning application integrates a number of features, including the water feature, (actually in St George's Square), that will enable both visiting and resident children to safely play within the internal streets and squares. A 'Public Play Trail' is included throughout the public domain and the strategy is set out on Page 15 - 18;

'A Play Trail is proposed within the Anglia Square scheme, to ensure that a variety of users engage with the development. This will consist of non-prescriptive play items along a linear route, beginning on the surface, rising up to furniture items, and culminating in sculptural play features.

The concept behind the development of the play trail will build upon the orchard notion that has been curated on site. This is in homage to the Cherry Grove and the likely nature of an orchard being on site historically. Norfolk has strong a connection to fruit agriculture, and is home to the first ever classified variety of apple in England, in 13th century. Nearly 50 of these varieties originate in Norfolk, offering an astonishing range of flavours and uses. The play trail will be an exciting and entertaining tribute to this history'.

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14.3 In addition to this play strategy, there are semi-private communal residential gardens on podium decks of the new buildings which will incorporate informal play facilities for children residing at the development. The overall approach easily satisfies the requirements of BfL 9 and therefore the GREEN rating is justified.

15.0 Question 10 Car parking

Is resident and visitor parking sufficient and well integrated so that it does not dominate the street?

15.1 I direct the Inspector to my PoE (WH1/1), Page 110 items 10.1 – 10.2 setting out a response to BfL Question 10.

15.2 Question 10b

Is parking positioned close to people's homes?

NCC score GREEN

NS score AMBER

I disagree with the NS Amber rating

15.3 NS state, '*Parking is located in multi-storey car parks which are secure, but not visible*'

15.4 The overarching question relates to the integration of parking and Question 10b, explores proximity. My PoE (WH1/1), Page 110 items 10.1 – 10.2, sets out the approach for parking and the DAS sets out further details on Page 140 -142. The approach to use residential uses to mask the multi storey car park ensure the impact of these is mitigated and provides active frontage along the public realm, whilst at the same time ensuring that the spaces are conveniently close to associated dwellings..

15.5 The car park will be secured with controlled access and CCTV. In the case of Block A the main access is controlled by a barrier and will be shared by the public and residents. A separate barrier is included on the appropriate floor level to secure the residents' parking area.

15.6 Residents will be allocated a dedicated parking space and can access each level via their circulation cores. This arrangement will ensure that every resident will become familiar with the owners of the other nearby cars.

15.7 The overall approach easily satisfies the requirements of BfL 10 and therefore the GREEN rating is justified.

16.0 Question 11 Public and private spaces

Will public and private spaces be clearly defined and designed to be attractive, well managed and safe?

16.1 I direct the Inspector to refer to my PoE (WH1/1), Page 111 setting out a response to BfL Question 11.

16.2 Question 11a

What types of open space should be provided within this development?

NCC score GREEN

NS score AMBER

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I disagree with the NS Amber rating

- 16.3 NS state, *'The two main open spaces, St George's Square and Anglia Square, are well proportioned and attractively landscaped. Additional entry points associated with more pedestrian permeability would have been beneficial. The problem with St George's Square is that overshadowing will make it unattractive during the day – it seems a cop-out to say that it will therefore be used in the evening!*
- 16.4 Question 11a is focused on the type of open space, this is set out in the Landscape Strategy , ref; PL1581-ID-001-01, (CD 4.92) and its Addendum (CD 7.85)..
- 16.5 Both Anglia Square and St George's Square provide active spaces that are well designed and integrate a high quality of hard landscape and planting. They both offer flexibility to accommodate a variety of pop-up activities.
- 16.6 Para 356, NCC committee report (CD9.1) states, *'The position of two main open spaces is well judged'*. These provide visual connection inwards and out of the development to the immediate context and therefore this design concept enhances legibility.
- 16.7 Our response to the requirement of 'additional access points' is covered above in our response to Question 1c.
- 16.8 Regarding overshadowing, a full assessment of the sunlight access has been carried out, which is covered in the technical section of the DAS page 121. The report prepared by Calford Seaden concludes that overall the scheme demonstrates careful attention to daylight and sunlight requirements, having due consideration to the nature of urban development. It notes that this scheme causes limited impact on existing surrounding dwellings whilst achieving generally positive results within the proposed development.
- 16.9 NS also contest, *'It is a concern that the spaces will be publicly accessible but privately owned and managed. Steps must be taken to ensure that the spaces remain accessible to all 24-hours a day'*.
- 16.10 I expect that NS are referring to the 'public spaces' and not the private gardens. The two squares and streets within the site will be accessible at all times but subject to normal provisions for closure of areas for maintenance, emergencies etc, all controlled by the s106 to the Council's satisfaction.

17.0 Question 12 External storage and amenity space

Is there adequate external storage space for bins and recycling as well as vehicles and cycles?

17.1 Question 12a

NS incorrectly states, *'Is there enough storage space for bins and recycling, as well as vehicles and cycles?'*

Actually BfL, Question 12a asks, *'Is storage for bins and recycling items fully integrated, so that these items are less likely to be left on the street?'*

In any event, I respond to NS comments against their point 12a below.

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17.2 NS state, *'The balconies will be big enough for two people to sit on but without additional space for personalisation. However, residents have access to very large shared podium gardens. The waste storage is well considered and will not undermine the quality of the public realm'*.

NCC score GREEN

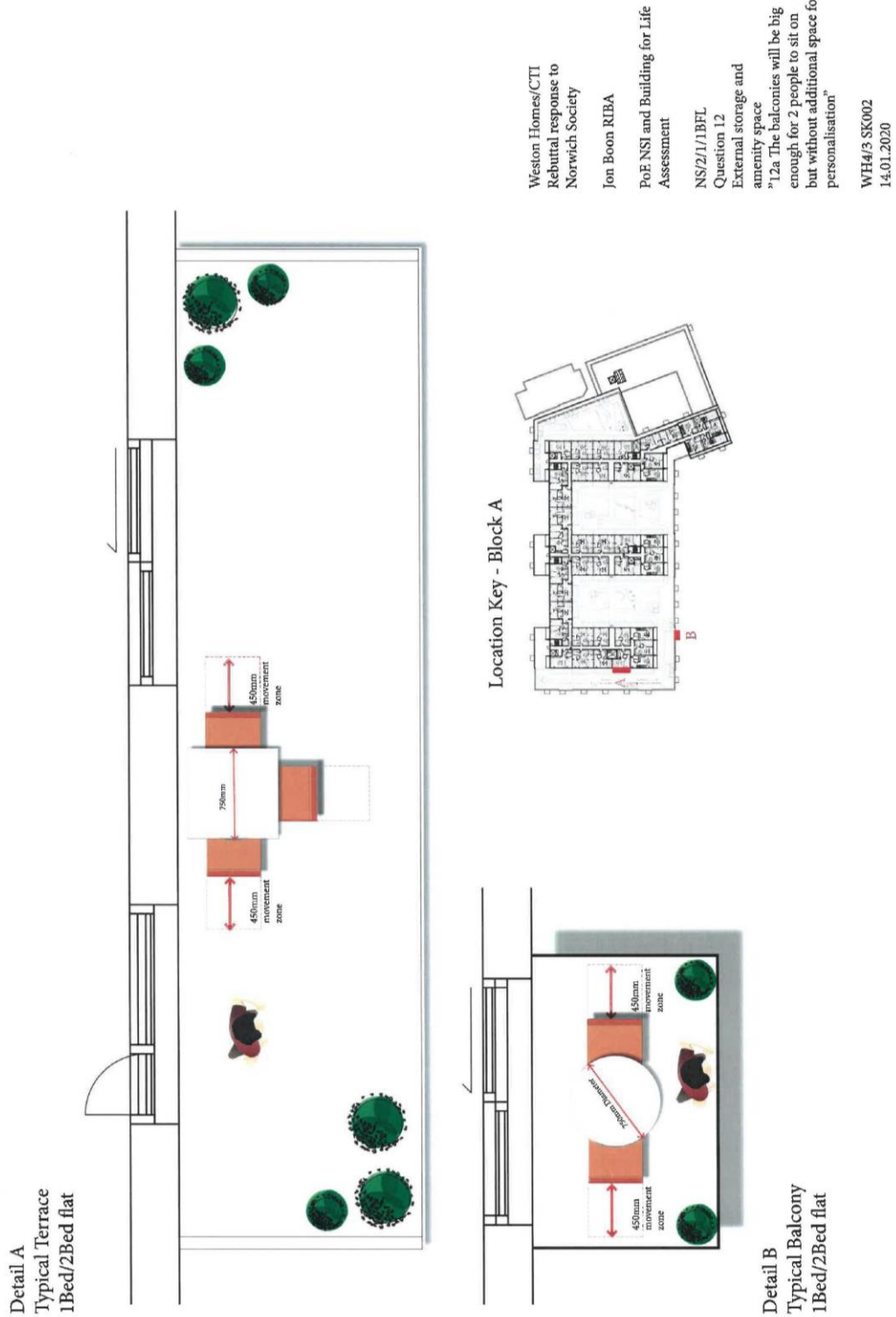
NS score AMBER

I disagree with the NS Amber rating

17.3 In addition to the public realm and private gardens, residents of the new development will also have access to private space, balconies are provided to most apartments, and private terraces are included for apartments which look out onto the podium decks. The provision includes a minimum area of 5m² and 7m² where the design calls for feature balconies. The private terraces are larger still. The sketch included on the following page demonstrates how residents can personalise these with appropriate furniture and planting.

17.4 I believe the NS score of AMBER is unjustified.

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Weston Homes/CTI
 Rebuttal response to
 Norwich Society
 Jon Boon RIBA
 PoE NSI and Building for Life
 Assessment
 NS/2/1/1BFL
 Question 12
 External storage and
 amenity space
 *12a The balconies will be big
 enough for 2 people to sit on
 but without additional space for
 personalisation
 WH4/3 SK002
 14.01.2020

Illustrative sketch of a typical residential terrace and balcony amenity

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Illustrative sketch of a typical residential floor identifying the location of each residential circulation core and the maximum number of apartments served

ANGLIA SQUARE, NORWICH

REBUTTAL: Norwich Society, Building for Life 12

Response to Historic England, John Neale's PoE, HE 1/1

I respond below to Para 8.19 of his PoE which considers the impact of the view from Cowgate, line 5 states;

'..... This modest 19th century street of two storey terraces would abruptly terminate in development which would loom above it. The use of some sort of grey sheeting to clad the upper stories appears, in the photomontage, to be an ineffectual sleight of hand intended to reduce the building's presence'.

Cowgate is a street characterised by two storey brick and rendered terraced homes. The street character is diminished by the bulk of the upper part of the existing supermarket on the east side of Magdalen Street. This dominates the left hand side in this view - the overall suggestion of scale along Magdalen Street is increased. The vista is closed by the haphazard organisation of the Anglia Square development. The 'wall' of the discussed car park looms over the lower scale building, 'Desh Supermarket' fronting onto Magdalen Street, neither contribute nor offer any positive value to this view or to the character of Magdalen Street. It should be noted that Desh Supermarket does not form part of the planning application.

Block A, is the most complex of the buildings on Anglia Square, and forms part of the detail application. This comprises the multi-storey public carpark, a key requirement for NCC to service the Local District Centre, which contributes significantly to its scale and height.

I refer to my CGi 03 Cowgate view looking west. The impact of the buildings is mitigated by articulating the massing with setbacks and detail changes in materials. The lower elements comprises of red brick with a contrasting cladding material to the upper floors. The layering of these facades will contribute to reduce the impact and provides a much improved and enhanced appearance within the vista. At each level of the new building planting is incorporated which incorporated multi stemmed small trees which will help to articulate the façade and scale.

In relation to Magdalen Street, JN's PoE, Para 8.21 states;

'The effect of the proposed development would be similar when considered from little to the north of the flyover. Here the angular forms of the cinema are at odds with the historic streetscape; their loss would be beneficial; but the new development would be at odds in different ways. The flank view of the four storey range on Magdalen Street would emphasise its mass, while the taller structures behind would loom above the streetscape'.

Magdalen Street is currently narrow and characterised by the inelegant overhanging building, behind this looms the bulk of the existing cinema. The proposal provides active retail frontages in character with the street and removes the oppressive overshadowing from the overhang. The fourth floor is set back, to emphasise and respond to the existing scale and character of the buildings on the opposite side. The colour and treatment of the brickwork, together with window fenestration all helps to articulate the rhythms of the existing street.

The taller buildings are set significantly further away from the street. The taller building integrate a series of setbacks and material change, this layering of the façade, articulated by the cladding system mitigates their and visual impact. Views of these blocks is more pronounced from the east side of the street, however a transient route from the flyover northwards, overall maintains a modern character that responds to the existing Magdalen Street Character.