

## Anglia Square, Norwich

**January 2020**

**Planning Inspectorate Reference: APP/G2625/V/19/3225505**

**Planning Inquiry Reference (Norwich City Council): 19/00007/CALLIN**

**Statement by Councillor Denise Carlo on behalf of the Norwich Green Party Group of City Councillors covering:**

**Introduction to the Green Party's objections to proposed development, Heritage Matters, Parking and Open Spaces/Biodiversity.**

### **Introduction**

1. In spite of some disfiguring modern redevelopment, the historical integrity of Norwich is still evident in its impressive collection of historic buildings, open spaces, the city walls which define the medieval core, the continuing importance of the river and above all in the survival of the medieval street pattern, apart from the north city.
2. Here in the oldest part of Norwich, the obliteration of Botolph Street, Stump Cross and other chunks of medieval streets along with an panoply of domestic vernacular buildings was a national tragedy from which the area has never recovered. As someone with an interest in landscape history, I never go to St Stephen's Street or Anglia Square, or cross the 4-lane sections of the inner ring road without inwardly lamenting the loss of their historic fabric, even though I have lived in the city for forty years.
3. The calamitous error of Anglia Square will be repeated if the proposed scheme is approved. A 20 storey tower and layering of massive blocks of between 1 and 12 storeys in height, wrapped around an inner core of car parking, might be appropriate for a metropolitan conurbation but not a medieval city centre with pre-Conquest and Norman origins.
4. Anglia Square also swept away a close-knit community, the area around which many 'Strangers' from the Low Countries, invited in 1565 by the City authorities to revive the local cloth industry had settled in the C16th. As late as 1903 a substantial cloth factory, described as a building by Pevsner in glowing terms, was built on Botolph Street. In published reports on the Norwich Survey conducted between

1971-78, one archaeologist described Botolph Street undergoing demolition as, “this intermingling of domestic housing, public buildings and industrial premises (which) preserves something of a medieval flavour”.<sup>1</sup>

5. Described as a landmark building, the tower is intended to signpost the new centre. But what are its special attractions? The high rise tower would contain expensive apartments unavailable for local people on the housing waiting list and nothing for visitors. Commercial retail, cinema, hotel and multi-storey car park; these are nothing out of the ordinary unlike a unique historic city. Above the commercial district on the ground floor will live several thousand residents in anonymous blocks. They will mingle with their neighbours on roof podium gardens as the ground space is regarded as commercially valuable for retail and car parking but not for green spaces for residents to relax and children to play.

6. Norwich's historic core has always accommodated change, but not destruction to its fabric on the scale of Anglia Square or St Stephens. Anglia Square's damage could be mitigated to a degree if new redevelopment responds sympathetically to the historic character of neighbouring streets but the proposed development does not do this.

7. The local community and Green Party councillors want to see instead human-scale housing, local shopping, employment, pubs, cafes and green spaces designed to create a strong community and reflect the historic character of the neighbourhood.

8. We also want to see the new quarter built to high environmental standards that include carbon neutral. The financial costs of constructing high rise blocks serviced by lifts and car parking using unsustainable steel, concrete and glass, would be better spent and their environmental costs avoided. The Government has legislated for net-zero carbon by 2050. New residential and commercial properties built today will still be in use in 2050 and must be ready for net zero carbon, otherwise they will require costly retro-fitting. We regret that the Planning Inquiry has not chosen to make climate change and energy a matter for discussion.

9. We have in Norwich a recent example of building a community to the highest environmental standards. Goldsmith Street won the 2019 Stirling Prize for a community of 100 social houses built to passivehaus standards and based around a network of streets in place of former high rise blocks.

10. Similar imagination can be applied to Anglia Square if the proposed

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<sup>1</sup> General Introduction from Excavations in North-East Norwich, by Malcolm Atkin and DH Evans in Excavations in Norwich 1971 – 78 Part III, East Anglian Archaeology Report No. 100, 2002.

development is refused, as the design by Ash Sakula architects for Historic England has shown.

### **Grounds of Objection**

11. The Norwich Green Party objects to the planning application as follows.

#### **Supply of Homes**

12. The proposed scheme would over-deliver on market housing and under-deliver on affordable housing which Norwich so badly needs. Dr Andrew Boswell will speak on this topic on behalf of the Norwich Green Party.

#### **Vitality of Magdalen Street and Anglia Square District and Community**

13. Commercial retail would threaten the distinctive retail offer of Anglia Square and Magdalen Street which serve the local community. It would harm the thriving artistic community based here. The proposed development would not create a diverse, strong integrated community with a sense of place. Councillor Martin Schmierer will give a statement about the impacts on the local community he represents.

#### **Conserving and enhancing the historic environment**

14. The scale, bulk, height and design of the high rise tower and accompanying blocks would have a harmful visual impact on the significance of numerous heritage assets. These include the medieval street plan which was influenced by the Anglo-Scandinavian town. The proposed development would have an overall adverse impact on the character and special qualities of the city centre conservation area and its setting, notably from St James Hill. I will consider this matter below.

#### **Parking**

15. I will also consider the planned 940 private residential and 600 public car parking spaces, the arrangement of which has influenced the site layout and design, resulting in a large building footprint and bulky blocks. The additional traffic generated by the car parking would increase community severance, air pollution and carbon emissions.

#### **Air Quality**

16. Air pollution would increase due to traffic generated by the proposed development. Dr Andrew Boswell will present evidence on behalf of the Norwich Cycling Campaign.

### **Climate Change and Energy**

17. The proposed development is not climate change fit for the future on many fronts: building construction and fabric, overall energy efficiency, limited on-site renewable energy and climate resilience. As a starter, the 1200 homes planned would be gas heated when the Government has announced a ban on gas installations in new builds after 2025. Further information about energy matters is provided in a separate statement by Dr Andrew Boswell.

### **Open Spaces, Green Infrastructure and Biodiversity**

18. The landscape design for the proposed development lacks a historical basis and does not fit with the historic character of this part of Norwich. It lacks informal playspace for children and green space for residents to relax in. The excessive levels of hard surfaces and inadequate levels of greenery would contribute to urban overheating. The inadequate provision of green space and biodiversity features especially at the ground surface level would not contribute to a net biodiversity gain. I will address this matter below.

### **Conserving and enhancing the historic environment**

19. In designing a high rise tower, the applicant seeks to emulate the landmark nature of historic buildings of south Norwich and alter the character of the north city which it describes as a 'low-rise enclave.' The tower would be seen from many different points within the historic core. Viewed from a distance, the tower and upper storeys of the blocks would give the impression of the historic city ending at Botolph Street and Pitt Street, further isolating the severed northern section of the city and especially the historic rump north of St Augustine's Church. A stark contrast would exist between the massive layered blocks and low rise tightly packed buildings ranged along neighbouring historic streets. Demolition of locally listed buildings at 43/45 Pitt Street would sweep away the final vestiges of the former historic neighbourhood and the scale of lost buildings. Inside the proposed development at ground level, there would be little sense of being in a historic city apart from sporadic views of the Cathedral spire and St Augustine's Church.

20. Historic England, SAVE and Norwich Society have written at length about the

significance of heritage assets and the proposed development's damaging impact. We strongly echo their concerns and I do not intend repeating their arguments.

21. Instead, I will firstly focus on the historic street pattern which is fundamental to understanding the development of Norwich and in this regard I will consider the townscape between Tombland and Colegate. Secondly, I will consider the proposed high rise tower as an illustration of the applicant's misplaced effort to re-engineer the northern part of the historic city.

22. At Appendix 1 I have written a short note on the origins and growth of Norwich, along with a note on Norwich Over the Water in greater detail. This is accompanied by Appendix 2 (hard copy only) which contains a small number of plans on the evolution of the growth of Norwich. These are:

- The Anglo-Scandinavian Borough
- Late Saxon or Anglo-Scandinavian Norwich
- The Norman Town
- Norwich Over the Water in 1789.

### **Norwich and Pre-Conquest Landscape**

23. In his fine account of the origins and growth and development of Norwich before 1800, Professor James Campbell wrote that for all the changes Norwich underwent in the 900 years before 1800, the most remarkable aspect about its history is how much was determined early on and how much before 1066.

24. Brian Ayers, former County Archaeologist for Norfolk, describes Tombland as standing “astride a relict pre-Conquest urban landscape. Streets to the north, south and particularly to the west can be suggested as elements within the Late Saxon or Anglo-Scandinavian town”.<sup>2</sup>

25. Norwich's street and settlements layout in the pre-Conquest period which coalesced to form the town in the c10<sup>th</sup> and c11<sup>th</sup> formed the basis of the shape, extent of the medieval street plan and its enclosure by the city walls. Magdalen Street (with St Augustine's Street, now severed, branching off at Stump Cross) and King Street (the latter almost a mile in length) met at Tombland, the Saxon market

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<sup>2</sup> **Norwich: Archaeology of a Fine City, Brian Ayers, 2009 page 41.**

and formed line of the North-South axis of the medieval town. Streets which branched off west from Tombland remain visible in the street pattern too (eg Colegate and Fishergate). The city walls enclosed the streets and settlements and including those along King Street and Ber Street to the south-east (hence the long tail shape) and development along Magdalen Street and St Augustine's Street to the north.

26. The 'Viking Heritage Trail' featured in the Norfolk Heritage Explorer is a circular walk covering important streets in the Anglo-Scandinavian town. It starts and ends at Fye Bridge, taking in Colgate, St George's Street, Calvert Street, Muspole Street, Magdalen Street and Tombland.<sup>3</sup>

27. Of course, the Norman conquest greatly impacted on the Anglo-Scandinavian town, with changes to the road system east of Tombland and demolition of settlements on land occupied by the Cathedral, Castle and new market and new additions to the street plan. However, the medieval street plan reflects the bones of the earlier layout.

28. The applicant's built heritage and design consultants and witness focus on buildings, (individual and groups) rather than consider the city's underlying structure and why it is fundamental to the city's special character. Similarly,, Norwich City Council's planning report (6/12/18) focuses on individual and groups of buildings in considering the impact on heritage assets and townscape.

### **City Centre Conservation Area Extended to Cover Whole Walled City**

29. Extension of the city centre conservation area to the whole walled city in 1992 was recognition that Norwich city centre conservation area should not be regarded as isolated islands of listed buildings but as areas within the total urban environment where special sensitivity is required because of a concentration of historic features. The date of 1992 is significant as the planning inquiry into the third phase of the Norwich inner ring road was held in this year; a scheme which had it been approved, would have severed the south-east tail of the medieval street plan.

30. Designating the whole area within the line of the city walls as a conservation area has encompassed the full extent of the medieval street pattern which contributes to our understanding of Norwich.

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<sup>3</sup> **Norfolk Heritage Explorer is an abridged version of the Norfolk Historic Environment Record maintained by Norfolk County Council. The Viking Heritage Trail can be found at: [http://www.heritage.norfolk.gov.uk/record-details?TNF1508-The-Viking-Norwich-Trail-\(Heritage-Trail\)](http://www.heritage.norfolk.gov.uk/record-details?TNF1508-The-Viking-Norwich-Trail-(Heritage-Trail))**

31. The Built Heritage Assessment (Impact on Norwich City Centre Conservation Area) states that,

*'The sheer scale of the overall Conservation Area is such that the proposed development would only have a moderate impact on it as a whole'. (5.5)*

32. I disagree. The tower will be seen from many points, having been specifically designed as a wayfinder building. The Heritage bodies describe the adverse impact on important buildings. I would also like to add the medieval street pattern to this.

### **Impact on Tombland to Wensum Street/Colegate/Magdalen Street**

33. The areas of townscape are among the finest in Norwich.

34. The City Council assesses the residual impact on the junction of Wensum Street/Elm Hill as 'Major Adverse'. (Planning Report, Table at 381).

35. I agree. Furthermore, I consider the cumulative degree of harm on this set of linked streets to be 'major adverse' and sufficient on its own to merit refusal of planning permission. This is apart from the cumulative harm from visual impacts on the wider settings of many other heritage assets. As Historic England underlines, the scale of the development is such that its impact would be felt right across the historic city." (SoC 6.1)

36. The Built Heritage Addendum does not comprehensively assess all the heritage assets which would be impacted along here. For example, the Built Heritage Statement, 4.3 Assessment of Heritage Assets: Grade 1 Listed Buildings and Scheduled Monuments no.21) states that the proposed development would not impact upon the setting of St Simon and St Jude Church on the corner of Wensum Street/Elm Hill. On the east side of Wensum Street opposite the Church, the tower would be visible on the skyline and consequently there would be a minor adverse impact on the wider setting of the Church. As well as being a building of special architectural interest in its own right, the medieval Church stands on a site of earlier foundation in Tombland and tells us about the historic value of this area. The Church has been omitted from the list of *Main Heritage Assets in Table 1 of Appendix 4, part of the Statement of Common Ground.*

37. The Addendum (2.29) acknowledges the harm to Wensum Street,  
*.....the southern approach along Wensum Street will undergo significant change. This is due to the impact of the 20 storey tower and 10 – 12 storey elements of Block*

*F and G in the context of north facing views along Wensum Street. The development will protrude above the skyline formed by the roofs of buildings on the west side of Fye Bridge Street and north side of Colegate and appear most prominently along the section of Wensum Street between the Church of St Simon and St Jude on the corner of Elm Hill and Fye Bridge”.*

38. In assessing the impact on the Northern Riverside character area, the applicant's assessment does not do justice to the importance of this piece of townscape,

*'The impact on this element of the Character Area's wider setting will be considerable but would result in negligible harm to its overall significance based on defining characteristics, including its linear form and those aspects which contribute to its medium significance in the national context.'* (Built Heritage Addendum 5.37)

*The applicant seems to have taken the Northern Riverside Conservation Appraisal and adopted its medium significance rating which is based on an overall assessment for the whole Northern Riverside character area which includes a large amount of modern industrial and commercial redevelopment.*

39. In relation to St Clement Church Colegate, the Addendum states (2.29) that,

*'The development will have little impact on the building's principal setting (ie north of Fye Bridge).....The impact on this aspect of the building's wider setting will be considerable resulting in 'less than substantial' but nonetheless moderate harm to the building's overall significance. This is chiefly due to the coherent and well preserved historic character of the building's surrounding townscape into which the development proposals would introduce built form and massing that contrasts sharply with the buildings in the foreground.'*

40. I disagree that the development would result in negligible harm on the principal setting of St Clement Church on the north river bank which is unique in being surrounded by footpaths on four sides. The medieval Church is a substantial building and stands on the site of an earlier church dedicated to a Danish Saint and whose parish boundaries were extensive I agree that the impact on the building's wider setting will be 'less than substantial' but I disagree that it would incur moderate harm. I consider that the degree of harm would be 'major adverse', with a prominent view of the tower modern block rising much higher than the church tower above the historic building street frontage on the north side of Colegate.

41. As paragraph (2.29) also notes: *'The Development will feature kinetically in these north facing views, receding as one approaches the asset and disappearing completely behind the buildings on the north side of Colegate as one crosses Fye*



*Bridge.'*

42. Although the proposed development will come into view, recede and disappear in relation to individual buildings, people will be generally aware of a modern tower block on the skyline from many points within the city.

43. For this reason, I disagree with the Built Heritage Statement (4.3 Assessment of Heritage Assets: Grade 2\* Listed Buildings within 250 Metre Radius, building 9), that the development proposals would have no impact upon the wider setting of the Fye Bridge Group (numbers. 11 – 15 Fye Bridge Street Grade 2\*), 'due to the density of setting of built form and the heavily enclosed setting this gives rise to'. The BH Statement cursorily describes the building as 'Former house dating back from the 1500s'. By contrast, Brian Ayers refers to 11 - 15 Fye Bridge as "one of two distinctive buildings on the north bank of the river..... the only other known fifteenth century domestic building to be aligned along the street.". Ayers describes this small group of surviving domestic buildings in Norwich from the C14th, C15th and C16th which includes 11-15 Fye Bridge as, " exceptional structures in that, firstly, examples that have survived and secondly they represent the most affluent level in medieval urban society".<sup>4</sup>

44. This more detailed description is a reminder of the need to consider individual buildings in their wider context as well as their wider setting. Even if the proposed development is not immediately visible from numbers 11-15 Fye Bridge Street, it will come into view when walking from Wensum Street to Magdalen Street.

45. The steps taken by the applicant for minimising identified harm to the significance of heritage assets are limited and blunt, firstly, 'block massaging and distribution' for relieving wider setting or reinstate urban grain and built form and secondly, 'high quality design of block tower as visual counter point'. It is difficult to see how a moderntower block can complement the smaller medieval flint tower of St Clement Church.

46. In my view, the applicant has consistently under-estimated the impacts on the significance of heritage assets. I consider that Norwich City Council has also under-estimated the impacts on the significance of several important heritage assets, for example, the medieval street pattern and St Augustine's Church.

### **20 Storey Residential Tower Block**

47. The policy guidance note for Anglia Square (March 2017) highlights the scope for

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<sup>4</sup> (Norwich, Archaeology of a Fine City (2009), Brian Ayers, p 120 121.

a landmark building, not necessarily tall in height, to reinforce the sense of place and make effective use of the site. (7.91) In interpreting the PGN, the applicant has designed a 20 storey residential tower block and public space as the 'big idea'. (Design and Access Statement, p18).

48. The applicant argues that this part of the city lacks an obvious landmark and that the c19th and c20th introduced '*a paradigm shift to the narrative for Norwich's modern development, one that demonstrates the city evolved beyond its medieval prototype some time ago and as a result the area north of the Wensum is no longer merely a low-lying urban enclave punctuated by modest church steeples or towers*'. (Design and Access Statement p40).

49. Modern design principles such as acting as a 'waymarker', providing 'a strong visual counter-point to historic landmarks' and introducing an 'element of time-depth', have been asserted over historic conservation principles. Ironically, the more that the tower is visible as a waymarker, the greater the impact on heritage assets and townscape.

50. As seen from St James Hill, the character of Norwich Over the Water, apart from ugly Anglia Square, remains low-rise buildings on narrow plots with a speckle of church towers. Anglia Square is visible and redevelopment as proposed would increase its prominence and seriously harm the setting of the city centre conservation area. The applicant's photographic viewpoints taken from St James Hill do not convey the magnificence of the Anglican Cathedral dominant in the foreground and the degree to which the tower block and layers of companion blocks would stand out.

51. Industrial development in Norwich over the Water has been a strong element throughout its history especially along the river, but this characterisation has applied across the whole city. In the c19th, industry had a large impact upon the topography of the walled city in general, with new industrial complexes built in all parts of the city, along the river and adjacent to the historic core. Many of the structure have been demolished or been absorbed into the city fabric. In the first 70 years of the C20th the Council moved housing out of the walled city and moved in industry and employment and now the reverse is happening.

52. There is no historic precedent in Norwich for locating a residential tower block as a landmark building in a public space setting. Historically, landmark buildings have been built within the walled city for religious, spiritual, defensive, civic and administrative purposes. Public spaces in Norwich in the pre-modern period were essentially markets, streets and churches with church yards, later extending to semi-public gardens and public parks. In the modern period, tall buildings of civic

importance, such as the City Hall and the Forum have been accompanied by public space to provide a gathering place for civic and public events.

53. The applicant also argues that the tower would create a gateway entry into the city centre from the north. Our view is that the dominant tower rather than the scheduled city wall section on Magpie Road would capture people's attention.

### **The Tower and City Council Evaluation**

54. The planning report (6/12/18, para 365) says that it does not follow that a new public space in the north of the city centre needs a tall building or a single landmark.

The City Council rebuts the applicant's case for a tower except on one ground. It agrees with the applicant that its statement that a *tower would act as a waymarker helping people to orientate and navigate around the city, as "undisputably true and "a benefit" (para 369) .*

55. On this subject, the planning report concludes the conclusion that a compelling case has been made "notwithstanding the harm to heritage assets that will occur", even though the report does not elaborate on why a compelling case has been made.

56. The relationship between a tall building and improving the ability to orientate and navigate around a historic centre from distant viewpoints is more complex than viewing the high rise structure from a distance and heading in its direction. Norwich city centre is a good example. The medieval street plan does not allow the pedestrian, cyclists or driver to take a direct route to a location and a journey by car or cycle also has to negotiate the road system as an additional layer of complexity. Tall buildings appear and disappear behind other buildings or as the ground rises and falls along the route, making the traveller more reliant on landmarks at ground level to negotiate a path. In Norwich, even with a map, it is tricky for visitors to find their way to the Anglican Cathedral from the marketplace. The best waymarkers are frequent street signposts.

57. The planing report agrees that a tall building can act as a counterpoint to the landmark buildings, especially the Anglican Cathedral to the south of the river and signal that the area to the north is no longer a poor relation. Furthermore, the Council maintains that the pattern of a city's development is not fixed. These statements strike at the heart of the integrity of the historic core. If core elements which makes Norwich historically important can be changed, the integrity and coherence of the whole is undermined..

58. There is no historic precedent for including a tower on this site and a compelling case has not been made.

59. HEAN 4 on Tall Buildings lists the advantages of tall buildings policies in local plans and recommends the assembly of an evidence base. Norwich City Council Policy DM3 f) concerning the 'Height, mass, scale and form' of new development, puts the onus on developers to demonstrate that appropriate attention has been given to these matters.

### **National and Local Policies on Conserving and Enhancing the Historic Environment**

60. The proposed development is inconsistent with the NPPF and also with local plan policies for conserving and protecting the historic environment.

61. The NPPF (184) states that heritage assets, *'are an irreplaceable resource and should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life of existing and future generations.'*

62. Putting a high rise tower and bulky blocks on the oldest part of Norwich would create permanent and harmful visual intrusion to important heritage assets. It would create the impression that the historic city terminates at the new district. It would further isolate the northern crescent of the medieval city between St Augustine's and the city wall.

63. The applicant has not described the significance of the historic street pattern as a heritage asset as required by NPPF para 189, nor identified and assessed its significance as required by NPPF 190.

64. In considering potential impacts, the NPPF (193) says that great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be) and this is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance. My statement focuses on the historic street pattern and I consider that significant weight should be given to conserving this heritage asset.

65. I consider that the degree of visual intrusion from the proposed development would cause less than substantial harm at the high end of the scale to the significance of heritage assets between Tombland, Wensum Street and Fye Bridge Street/Colegate/ Magdalen Street which include historic streets and spaces, the wider settings of buildings of historic interest (Grade 1, Grade 2\* and Grade 2) and the river crossing. They will intrude upon a number of townscapes of several character areas (Elm Hill and Maddermarket, Colegate, Northern Riverside) and harm the historic interest of the character of the city centre conservation area overall. The high rise tower and unforgiving horizontal lines of the upper storeys will create the impression that the historic city terminates at that point, isolating the

outer north crescent of the historic core beyond New Botolph Street and Pitt Street.

I consider that less than substantial harm at the high end of the scale also applies to St Augustine's Church and Gildencroft.

66. Overall, having read the built heritage assessments, looked at the submitted Views, walked around the city and applied my local knowledge, I consider that the proposed development lead to a less than substantial harm close to the high end of the scale due to the degree of visual impact upon the wider settings of designated heritage assets of high importance and on the city centre conservation area and its setting.

67. The tower is designed to be seen and in my view experiencing frequent views of the modern structure would have a cumulative impact on the significance of heritage assets.

### **Weighing Benefits Against Disbenefits**

68. The NPPF (196) requires the balancing of harm against the public benefits where a development proposal would lead to less than substantial harm.

69. In my view, the public benefits of the proposed development would include the opportunity to:

- redevelop a large eyesore brownfield site in a city centre location.
- Build in a location which is highly accessible by bus, foot and cycle.
- Provide a significant number of homes. However, only 10% of dwellings in the proposed development would be affordable. Most dwellings would be built in unsustainable high rise blocks with long corridors and lifts.

70. In terms of heritage, the main benefits are the creation of a link between Magdalen Street and St Augustine's Street and opening up of views along St George's Street and Calvert Street. The disbenefit is that the proposed development would further isolate the historic northern part of Norwich and create the impression that the historic city ends with the high rise scheme.

71. Green Party councillors conclude overall that **the** benefits would be considerably outweighed by the disbenefits. **We** would prefer to see a new development proposal come forward than see the proposed development go ahead.

### **Comments on Proof of Evidence by Chris Miele on Heritage, Townscape and Visual**

## Impact

72. Mr Miele states that'

*“The Normans completely re-shaped Norwich, obliterating older settlement patterns and creating large new institutions including the Anglican Cathedral and the Castle with its massive earthworks”. (6.11) “Street patterns changed.....” (6.12)*

73. This is only partially correct. The Normans did indeed destroy some settlements to make way for the Cathedral and its precinct, the Castle and market. However, the underlying street and settlement layout of the Anglo-Scandinavian town remained and are reflected in the medieval street plan enclosed by the city walls, as I explain in my Appendix 1 and shown by the plans in Appendix 2.

74. Mr Miele commends the adopted CA (CD 2.10). The account of the Saxon Town is short in the section on History and Archaeology of Norwich, (p9). Taken at face value, a reader would assume that the layout of the Saxon town was limited in extent and replaced by the Norman street pattern. This is only partly true.

75. Mr Miele identifies a harmful impact from part of the historic core south of the river along Wensum Street between Tombland and Fye Bridge but says that this would be accompanied by 'legibility' benefits. I interpret this as meaning that the tower would be highly intrusive in a sensitive historic landscape.

76. In considering the effect on Group 3: Tombland and Wensum Street to Fye Bridge (paras 8.62 to ), Mr Miele says the effect begins where Tombland becomes Wensum Street, but in my view the effect would start at the corner of Tatler's restaurant building (no 21? Tombland), with a high degree of impact and harm by Erpingham Gate. I disagree that the tower would have a limited effect on the townscape and heritage even if the effect is transitory. A glimpse of a modern tower block would look quite startling in a townscape of high value next to a Grade 1 building and lead the viewer to conclude that the historic city ends at the tower.

77. Mr Miele describes Tombland and streets leading north as:

*'an interesting area.... (which) consists linked spaces, orientated on a north-south axis, presenting a series of distinct spatial experiences.'* (8.63) and *'a well-defined area'*. (8.64) and having:

*'a strong historic character that it the produce of the buildings (obvious age, varied character reflecting that, varied grain, etc) and the spaces'*. (8.67) and:

*'The route itself, captured in these views, is an important and well-trafficked one, albeit not part of the ring road network. Historically it is important for linking the southern part of the city to the north across an ancient crossing and so continuing on into Magdalen Street. This is another ancient route and which leads to the Application Site.'* (8.67) and

*'The effect begins at or near to the point where Tombland becomes Wensum Street. My strong sense in this location was of the space angling to the east following the frontage of the Maids Head Hotel (Grade 2) into Palace Street'. (8.68)*

78. At this point, Mr Miele draws attention to what he regards as an unsympathetic Victorian extension to the Maidhead's Hotel. In the extracts above there is no discussion about the significance of Tombland and streets leading off as heritage assets apart from the fact that they are ancient.

79. Travelling east along Tombland past the Maid's Head hotel, the PoE does not mention St Simon and St Jude church at the junction of Wensum Street and Elm Hill. (8.74) Mr Miele contends that the tower which will be a noticeable feature in the streetscene by this point, 'has an urban design benefit which is demonstrable'. I cannot see how a 20-storey tower block seen rising along a 500 metres section of narrow street packed with historic buildings is beneficial. Again, Mr Miele excuses the high degree of intrusion by claiming that the tower will assist with wayfinding.

80. Mr Miele does acknowledge (8.76) that *'the tower and upper parts of Blocks G and J will detract attention from what is very well enclosed space, communicating the history of this part of the city and illustrating that with buildings of great quality and variety'*.

81. At St Clement Church, he agrees that the tower and lower blocks intrude into the setting of the church chancel of St Clement and the Georgian House behind it. However, he says that moving closer to the church and house to appreciate their materials and detailing takes attention away from the proposed development. This may be the case close to and static, but moving round and through the whole area a viewer will be conscious of a modern tower out of character with a medieval city.

82. I cannot find any specific mention of the 11-15 Fye Bridge group (merchant's house c1500 Grade 2 \*) on the corner of Fishergate opposite to St Clement Church.

83. Mr Miele identifies harm at the low end of less than substantial scale to the Wensum Street component of Elm Hill and Maddermarket character area and associated parts of the Northern Riverside Character Area which he says is countervailed to some extent by legibility and wayfinding (8.178). I strongly

disagree. In my view, Mr Miele has not comprehensively assessed the significance of heritage assets including key buildings and the street plan in a set of townscapes where the amount of intrusion by modern structures is currently limited.

### **Comments on Proof of Evidence by Ben Webster, Norwich City Council on Heritage, Townscape and Visual Impact**

84. Section 5 acknowledges the 'major adverse' degree of harm to heritage assets in St Augustine's Street, Fye Bridge Street and Wensum Street. In my view, the degree of harm on heritage assets along here amounts to 'substantial harm' at the high end of the scale because several key assets have not been assessed (medieval street pattern, St Simon and St Jude, 11-15 Fye Bridge).

85. In relation to Mr Webster's observation at 5.4 that large scale changes have occurred that we now celebrate as part of the city's character, this is indeed the case for the examples given. However, it is equally the case that a number of modern large scale changes have occurred which are ugly and regrettable. These include widening of medieval St Stephens Street in the 1960s/70s and its reconstruction on the east side which included two 9-storey towers; Norfolk Tower on Surrey Street; MSCPs on Queen's Road and Duke Street; modern blocks on Mountergate; dual carriageway sections of the inner ring road involving loss of parts of the city walls and severing of the street plan in north Norwich as well as Anglia Square.

### **Parking**

86. Current traffic conditions on the road network surrounding the site are unpleasant for residents and vulnerable road users. Along St Augustine's Street and Magdalen Street, narrow pavements, traffic, severance and air pollution breaches create a poor environment. Traffic, severance and perceptions of road danger on modern roads adjacent to the site - New Botolph Street, Pitt Street and St Crispin's Road are also off-putting.

87. The NPPF advises that 'significant development should be focussed on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes'. (section 9 Promoting sustainable transport).

88. Anglia Square is one of the most highly sustainable and accessible locations in the city centre, but the applicant has chosen to incorporate a high level of residential (up to 940 spaces based on a ratio of 0.75 spaces per dwelling) and public car parking (600 spaces) in a dense city centre location which we believe would undermine national and local policy principles of reducing the need to travel and



encouraging modal switch. The 600 public parking spaces will replace around 600 spaces in current operation on the site but trip rates for these will be higher with the Development in place.

89. Residential, commercial and hotel uses would be wrapped around extensive amounts of private car parking to increase the buildings footprint. A further 400 private parking spaces and 600 public parking spaces would be housed in a multi storey car park. Public parking includes a buffer of 90 spaces to allow for circulation and searching and to accommodate the commercial/retail aspect of the scheme and additional demand from seasonal increases. Public parking will exceed the Local Plan Cap of 10,000 spaces by 230 spaces.

90. The City Council planning report (para 498) says that 'residential car parking levels lower than what is proposed would be acceptable and indeed be preferable on this site, but the applicant has indicated that not offering a parking space would impact on sales and scheme viability.

91. Notwithstanding the ample provision of parking, the applicant anticipates that many of the private cars will remain stationary at least during peak hours on the basis of comparable Trip Rates. The Transport Assessment concludes that trip rates indicate low levels of vehicle trips by private car at peak times but higher vehicle trips generated by public parking. As a result, it says that the traffic impact of the development would be minimal. The TA also says that modelling included within the document does not consider the potential impact if the partially implemented consent were to be fully developed and under these circumstances, the higher forecast trip generation from the partially implemented scheme would have a greater impact (para 6.1.56).

92. Even moderate levels of vehicle trips predicted, increase in traffic flow can have a disproportionate, detrimental impact on narrow one-way streets and busy urban junctions. For example, St Augustine's Street would experience nearly a 10% traffic increase With Development by 2036 (from 2028 Base). The TA (6.1.53) reports an increase in the Ratio of Flow to Capacity in 2028 with Development at the Aylsham Road/St Augustine's Street/Magpie Road/Waterloo Road junction, but says the junction would still operate satisfactorily. However, even moderate increases in traffic flows on narrow streets and their junctions can worsen traffic and environmental conditions.

93. Traffic would approach saturation level at St Crispin's roundabout junction onto Pitt Street South (weekday and Friday PM, TA Table 23), at Bull Close Road and Magpie Road signalised junction (Weekday PM, TA Table 27) and Magpie

Road/Esdelle Street Junction (Weekday AM, TA Table 29), with Development in 2028.

94. We are also concerned about the doubling of vehicles on Edward Street South Eastbound travelling to the multi storey car park (around 600 public spaces and 400 private spaces) which will result in community severance as the EIA Transport Chapter acknowledges.

Edward Street South 24 hr AADT

Eastbound	2016 Survey Year	2028 Base	2036 Base	2036 Base with Dev
	1951	2190	2362	4141
Westbound	971	1007	1007	975

95. Traffic on Edward Street includes a significant percentage of HGVs (22.18% Eastbound and 33.53% Westbound for all scenarios) involving diesel buses as well as delivery lorries. We are also concerned about the vulnerability of residents on Edward Street to pollution from vehicles queuing for the multi-storey car park. Queuing with tail backs is a regular occurrences at underground car park entrances to Castle Mall and Chapelfield Mall.

96. The applicant proposes a review of car parking needs as the development progresses. However, almost two thirds of parking provision will be built in Phase 1 (Block A with 600 public spaces and 335 private spaces).

Phase 2 (Blocks E, F and D will result in a further 300 residential parking spaces).

Phase 3 (blocks G and H will involve 275 residential spaces)

Phase 4 (Block B) will involve 14 spaces).

97. In any review, the applicant could insist on completing its full parking quota on viability grounds and Council would no doubt compromise in order to see completion of the development. If residents make more private car trips than predicted by Trip Rates, generated traffic will be higher, leading to increased traffic flows and environmental impacts. It is difficult to manage demand for private car use once residential car parking has been provided without some form of demand management such as additional road space reallocation or distance based charging . There is no additional budget for managing any detrimental impacts on the road network linked to the development.

98. Traffic generated by other new developments delivered before completion of the proposed scheme in 2031 could also add to pressure on the junctions and the Anglia Square development could tip the junctions over their operating capacity.

99. The applicant relies on the Norwich Northern Distributor Road (NDR) for releasing road space for new development. To date, removal of through traffic from the main artery through city centre has increased traffic on sections of the inner ring road such as Chapelfield Road. Ambitions for two-way bus working on the Prince of Wales Road was dropped last year due to congestion on the inner ring road.

100. Traffic generated by the proposed scheme will compete with future growth for road space. The NDR strategic model takes into consideration planned and committed schemes in the Joint Core Strategy (2008 to 2026). Public consultation will shortly start on the Greater Norwich Local Plan Regulation 18 Draft Plan (2019 to 2038) which involves additional sites for almost 8,000 new dwellings. These include the East Norwich Strategic Regeneration Area (comprising 1,200 dwellings at Carrow Works adjacent to the inner ring road and 800 dwellings at the neighbouring Deal Ground). City centre sites such as Anglia Square play a vital role in planning for low levels of car parking or even car free development to minimise pressure on the road network.

101. If the two major funding applications to the Government's Transforming Cities and Future Mobility programmes prove successful, Norwich will see a step change in sustainable transport infrastructure. The current NDR traffic model already factors in a large number of sustainable transport measures. They include a city-wide bus rapid transit system based on six cross-city corridors, intended for delivery by 2026 but only limited sections have been built thus far. Bus infrastructure identified in the Transforming Cities bid would therefore involve double-counting to some extent. The NDR traffic model will need updating to take account of further planned growth.

### Air Pollution and Carbon Emissions

102. Norwich Cycling Campaign has addressed air pollution. Green councillors are particularly concerned about fine particulate matter (PM 2.5) which can affect every organ of the body. A study by Public Health England estimated the mortality burden for modelled annual average concentrations of PM 2.5 in each local authority area from human activities in 2010. In Norwich, where road traffic is the main pollutant source, 5.5% of deaths of people aged 25 and over were attributed to PM2.5. <sup>5</sup>

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<sup>5</sup> ['Estimating Local Mortality Burdens Associated With Particulate Air Pollution', Public Health England \(2014\).](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf)  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/332854/PHE\\_CRCE\\_010.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/332854/PHE_CRCE_010.pdf)

103. The applicant maintains that the shift to electric cars and van coupled with other national and local policies will reduce air pollutants and carbon emissions. However, we believe the applicant cannot rely on uncertainties in national policy to reduce air pollution generated by its scheme to within safe levels and to curb carbon emissions.

104. The Climate Change Committee says the Government's Road to Zero delivery plan is too vague for cutting air pollution and aligning to the net zero challenge whilst 2040 is too late for a phase-out of petrol and diesel cars and vans. There is also no timetable for replacing buses and HGVs powered by fossil fuels. <sup>6</sup>

105. Transport is now the UK's biggest contributor to climate change, accounting for a third of greenhouse gas emissions. Traffic volumes are still being allowed to grow and the pace of switch to electric vehicles is very slow. Indeed, the the average carbon dioxide emissions of cars sold in the UK rose for the third consecutive year in 2019 due to a switch from diesel cars to petrol and the popularity of heavier cars. <sup>7</sup>

106. The total transport carbon footprint for Norwich has increased since 2013 (the per-capita transport figures used in the Annual Monitoring Report do not take into account population growth). Because we have left it so late to tackle transport carbon emissions, we now have to take urgent action through strong demand management measures such as car parking restrictions.

107. Very low levels of car parking or even car-free development (apart from disabled spaces and provision for deliveries) would facilitate a better site layout and design; free up valuable land and expenditure for more important uses; minimise traffic impacts and related environmental impacts and reduce transport carbon emissions and help towards Net Carbon Zero. It would be far better to pursue a precautionary approach and reject the proposed development which will knowingly contribute to adverse transport impacts.

## **Green Open Space and Biodiversity**

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<sup>6</sup> [2019 Progress report to Parliament, Committee on Climate Change \(July 2019\), Executive Summary, The Committee on Climate Change.](#)

<https://www.theccc.org.uk/wp-content/uploads/2019/07/CCC-2019-Progress-in-reducing-UK-emissions.pdf>

<sup>7</sup> 'Emissions from cars rise for third consecutive year', The Guardian 6 January 2020  
<https://www.theguardian.com/business/2020/jan/06/uk-car-sales-brexit-diesel-electric-vehicles-emissions>

108. Historically, Norwich Over the Water had a semi-rural appearance. The green setting of St Augustine's Church and Gildencroft are a reminder of its former character.

109. National and local policies provide the tools for re-greening and designing sympathetic and climate resilient development. The NPPF advises planning should:

- provide safe and accessible green infrastructure; (NPPF 8 91C);
- create developments sympathetic to local character and history; (NPPF 12 127 c);
- avoid increased vulnerability to impacts from climate change (NPPF 14 150);
  - provide net gains for biodiversity; (NPPF 15 170 d).

110. Local policy DM3 includes a number of principles which include local distinctiveness, green infrastructure, biodiversity and climate change. Under DM8, sites above 100 new dwellings should provide informal, publicly accessible, recreational open space and include younger children's playspace of at least 150 sqms for 100 child bed spaces or more. A requirement of not less than 20% of the total site area dedicated to open space is repeated in the adopted SPD on Open Space and Play.

111. These are policies which the Council has diluted to satisfy commercial demands rather than provide a high quality of life for residents. Almost the entire site at ground level would be covered by built structures and hard paving, softened only by a modest number of trees (3 anchor trees and quoted figures of between 100 – 200 new trees), scraps of manicured greenery, some green walls and 'linear bio-swales' along Pitt Street. Private outdoor space for residents would be met by roof top podiums and children's play opportunities would be 'incidental in the landscape'.

112. A pitiful number of biodiversity features are add-ons. Hedgehog, bird and bat boxes will be irrelevant unless food sources are created. Wildlife cannot feed on paving.

113. The result will be a 'clean', clinical environment, lacking informal green space for children to run around and no room for nature. The Climate Change Committee recommends an increase in green infrastructure for cooling cities and providing pathways through the urban environment for biodiversity to migrate as the climate changes.<sup>8</sup> Conservation groups have called for re-greening, describing the UK as one of the most nature depleted countries in the world.<sup>9</sup>

114. Weston's Landscape Strategy describes Anglia Square as 'a hard grey

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<sup>8</sup> How local authorities can reduce emissions and manage climate risks, Committee on Climate Change May 2012. [https://www.theccc.org.uk/wp-content/uploads/2012/05/LA-Report\\_final.pdf](https://www.theccc.org.uk/wp-content/uploads/2012/05/LA-Report_final.pdf)

<sup>9</sup> UK State of Nature 2016

[http://ww2.rspb.org.uk/Images/State%20of%20Nature%20UK%20report\\_%2020%20Sept\\_tcm9-424984.pdf](http://ww2.rspb.org.uk/Images/State%20of%20Nature%20UK%20report_%2020%20Sept_tcm9-424984.pdf)

environment'. The proposed scheme would replace it with a different type of hard environment.