

**CONSULTATION RESPONSE: OBJECT**

Ms Tracy Armitage  
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By email to: [tracyarmitage@norwich.gov.uk](mailto:tracyarmitage@norwich.gov.uk)  
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Our reference: 22043

26<sup>th</sup> May 2022

Dear Ms Armitage,

**22/00434/F - Hybrid (Part Full/Part Outline) application for the comprehensive redevelopment of Anglia Square, and car parks fronting Pitt Street and Edward Street for: up to 1,100 dwellings and up to 8,000sqm (NIA) flexible retail, commercial and other non-residential floorspace including Community Hub; up to 450 car parking spaces (at least 95% spaces for class C3 use; up to 5% for class E/F1/F2/Sui Generis uses), car club spaces and associated works to the highway and public realm areas | Anglia Square Including Land And Buildings To The North And West, Anglia Square Norwich.**

Thank you for consulting SAVE Britain's Heritage on the above planning application for the construction of 14 buildings of up to 8-storeys within the historic Norwich City Centre Conservation Area (NCCCA) at Anglia Square. As you are aware SAVE Britain's Heritage has a long involvement in this site, as we took part as a Rule 6 Party at the 2020 Public Inquiry against the previous 20 storey tower proposals promoted by Weston Homes and Columbia Threadneedle, and refused by the Secretary of State. Weston Homes consulted SAVE on their revised plans in individual meetings, and this letter restates concerns that we previously outlined in letters to them dated 29<sup>th</sup> September 2021 and 29<sup>th</sup> January 2022.

Whilst we support the principal of redeveloping Anglia Square in a sustainable way, we consider the number of flats proposed, and the overwhelming scale and massing of the scheme would substantially harm the unique historic character of the Norwich City Centre Conservation Area. We also object to the number and mix of units proposed, the inadequate provision of affordable housing, and the poor layout of the majority of the flats proposed. We wish to highlight these concerns in the context of substantial public funding that this scheme is set to receive. For these reasons we wish to register our objections and call on the Local Planning Authority to refuse planning permission.

### **The site and conservation area setting**

Anglia Square is situated in the medieval heart of Norwich, one of the finest and best-preserved cathedral cities in Britain. The area was originally set out in residential streets with Botolph Street running through the heart of the site between Pitt Street and St Augustine's Road to the northwest and Magdalen Street which borders the site to the east. Anglia Square is a defined character area of the historic Norwich City Centre Conservation Area (NCCCA), which includes the totality of the area within the medieval city walls and is a designated heritage asset of the highest significance. The city walls, of which various fragments still survive, encompassed a larger area than any other medieval city in Britain. Within its boundaries thirty-five medieval churches survive, more than any other city north of the Alps.

Remarkably, several unlisted buildings survive at the southwestern corner of the site, despite the area's wartime bombing and 1960s redevelopment. These include a locally listed former Victorian public house, a Georgian house and various unlisted flint buildings along Cherry Tree Yard. Three of these buildings are currently subject to listing applications with Historic England, and it is believed that one of them, a flint former stable block may also contain the retaining wall of St Olave's Church, a medieval church which stood on the site until 1546. Its dedication to a Norwegian saint strongly implies that the church was built towards the middle of the 11th century and hence was pre-Norman Conquest.

Together, the trio of buildings, significant in their own right, contribute positively to the character and appearance of the NCCCA and could play a key role in helping knit a more sensitive new development into the historic townscape. Whilst there are several substantial buildings in Anglia Square itself, the scale of these historic properties is completely in keeping with the prevailing scale of the surrounding historic environment to the north, east and west of the application site, which at 2 – 3 storeys on average, is overwhelmingly low. Much of the medieval street pattern around Anglia Square also survives intact, reflecting a key characteristic of the NCCCA and Norwich as a whole, which has an unrivalled collection of surviving medieval streets.

The site also forms the immediate setting for multiple designated and non-designated heritage assets, including the grade I listed church of St Augustine's, the grade II listed row of alms houses at 2-12 Gildencroft, grade II listed Doughty's Hospital immediately south of the site, and numerous listed buildings along Magdalen Street. Anglia Square is also situated in the wider setting of the River Wensum river valley, whose skyline and dramatic topography is characterised by numerous highly significant historic church towers and civic buildings which together define the city's historic character, and are fundamental to its overall historic significance. Given the sensitivity of this setting, and the historic significance and degree of surviving historic buildings and streets in central Norwich, the entire city centre is protected as a designated conservation area, of which Anglia Square is part.

### **2018 Public Inquiry Scheme**

On 12<sup>th</sup> November 2020 a previous scheme (referred from here on as the '2018 appeal scheme') for the comprehensive redevelopment of Anglia Square with up to 1250 dwellings, a hotel, ground floor retail and commercial floorspace, was refused by the Secretary of State (SoS), following a public inquiry held in February 2020.

### **Proposed scheme**

The proposal is a hybrid planning application including detailed plans for the erection of eight blocks of up to 8-storeys in height, containing 367 flats and 5,808 sqm of non-residential commercial space and 146 car park spaces at basement and ground level. The outline element of the scheme seeks permission for a further six 3-8 storey apartment blocks housing 733 flats and a maximum of 2,192 sqm of retail, commercial and non-commercial space, plus associated plant services and a maximum of 304 further car park spaces.

Of the 1,100 homes proposed across both elements, 106 units will be affordable housing (10%), with 954 designated for the private market (90%). The scheme is also in receipt of £15 million of Homes England

Housing Infrastructure Fund (HIF) grant funding and a reduced Community Infrastructure Levy contribution.

### **Substantial harm**

Whilst we recognise that there are some improvements on the 2018 appeal scheme, such as the removal of the 20 storey tower, our primary objection to the proposed scheme is the substantial harm it would cause to the historic character and significance of the Norwich City Centre Conservation Area (NCCCA). This harm would be derived in two ways:

Firstly, from the overall scale, massing and footprint of the proposed blocks, which will dominate not only this area of the NCCCA with their abrupt change in scale, but also the setting and finer grain of low scale streets surrounding Anglia Square. It is Norwich's extensive pattern of traditional low scale streets of mainly 2-3 storeys, yards and array of smaller buildings that makes it such a unique and special place.

In contrast, the scale, massing and dense layout of the 14 large residential blocks proposed would sit uncomfortably in their context, creating an abrupt change in scale and bulk from the surrounding finer grain and much lower scale townscape. The large footprint and massing of the blocks would dominate and overwhelm this part of the Conservation Area by standing up to 4 four times in height when compared to the majority of the surrounding buildings.

Verified view images of the proposed development are provided in the Assessment of Operational Visual Effects. However, many of these images are unrendered and shown simply as grey blocks of coloured contour outlines. This approach limits the ability to assess the full impact the buildings would have, both at street level within the development and from various points around the perimeter of the site. We therefore request that additional fully rendered images of the proposals are provided for the following verified views: Views 23 & 24 (St Augustine's Churchyard and Gildencroft Houses), View 33 (Junction of St George's Street and St Crispin's Way), and View 35 (St Crispin's roundabout).

Secondly, from the proposed demolition of the unlisted historic buildings (identified above) at the southwestern corner of the site. These buildings form the last remaining link to Anglia's Square historic use and character, having survived major bombing and comprehensive redevelopment in the 1960s. Notwithstanding the current listing applications for three of these buildings (43-45 Pitt Street, 53-55 Pitt Street and St Olave's Church Remains), we consider demolition as currently proposed to be unacceptable in heritage terms. SAVE previously opposed the loss of these buildings under the 2018 appeal scheme and remains of the view that they should be retained as part of any redevelopment of the site.

### **Policy**

Norwich City Council's adopted City Centre Conservation Area provides guidance on the appropriate scale of new buildings, and states that they must respect their context and be of an appropriate scale to their localities. In areas of significance or low significance: *'The prevailing scale of existing traditional buildings should be respected, but the careful siting of taller buildings and the use of larger scaled buildings in appropriate locations will be encouraged provided that they do not negatively impact on important views of citywide and local landmarks or affect the setting of listed buildings.'*

Anglia Square Policy Guidance Note (March, 2017) paragraph 7.90 states that: *"New development should be sensitive to the scale of existing buildings in its vicinity and must respect the setting of historic assets."*

Norwich Development Management Policies Local Plan (November 2014) Policy DM9 Safeguarding Norwich's heritage states that: *"All development must have regard to the historic environment and take account of the contribution heritage assets make to the character of an area and its sense of place [...] Development shall maximise opportunities to preserve, enhance, or better reveal the significance of designated heritage assets and that of any other heritage assets subsequently identified through the development process."*

The National Planning Policy Framework (NPPF, 2021) provides guidance for assessing harm caused to the designated assets, including conservation areas. Para 200 states that: *“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.”*

With this local and national policy in mind, we consider the radical increase in scale resulting from the 14 large buildings proposed would substantially harm the NCCCA and settings of the grade I and II listed buildings around it, with no clear and convincing justification for why such an approach is necessary to regenerate the site. Furthermore, such an approach risks repeating the mistakes which led to the current alienation of Anglia Square from the rest of the historic city, a situation the applicant has made clear it wishes to rectify.

### **Housing provision**

In our view, the 1100 units proposed is excessive for this site, echoing issues raised about the previous appeal scheme, where the applicant’s desire to construct 1250 units created considerable constraints on the overall design and quality of housing. In contrast, the new site allocation guidance for Anglia Square - ‘Policy GNLP0506’ (currently under Regulation 19 consideration by an Inspector for possible inclusion in the emerging Greater Norwich Local Plan) - states that: *“The site will deliver in the region of 800 homes.”* We therefore question the justification for proposing 1100 residential units, which is very marginally fewer than the 1,250 of the 2018 appeal scheme and 300 more than the policy recommendation.

The mix of housing proposed also fails to accord with the overall housing need for Norwich set out in Local Planning Policy. Of the 1100 total units proposed under the hybrid application, 95.1% are 1 and 2 bed flats. However, Norwich City Council’s 2017 Central Norfolk Strategic Housing Market Assessment (SHMA) identifies that only 36% of Norwich’s assessed housing need comprises 1- and 2-bedroom flats.

As with the previous 2018 appeal scheme, the new scheme proposes a reduced affordable housing contribution of 10%. This figure is 23% below the council’s adopted policy target of 33% set out in the Joint Core Strategy policy 4 and the Norwich Local Plan policy DM33, despite the scheme benefitting from £15 million of Homes England grant funding.

### **Design and amenity**

We remain concerned that over half the flats proposed under the hybrid scheme (50.9%) are single aspect. This was also a consistent point of concern over the applicant’s 2018 appeal scheme. The amount of private amenity space per unit is unclear in the plans submitted, with no average area per unit indicated. With regard to the inclusion of podium gardens and roof top terraces, it is unclear how these would be managed and the degree to which they would be communally or privately accessible.

### **Documentation queries**

Following careful assessment of the applicant’s planning documentation, we have identified several inconsistencies pertaining to indicated building heights which require clarification. Elevation drawings for Block F [Drawings: ZF-XX-DR-A-05-0300, ZF-XX-DR-A-05-0301 & ZF-XX-DR-A-05-0302] show greyed out upper floor levels which suggest there are 9-storeys for this block, as opposed to the 8-storeys indicated in the Master Parameter Plans Architecture Layout – Building Heights [Drawing: AO1-PP-100].

There are also a number of discrepancies between the building heights set out in the master building heights site plan (Parameter Plans Architecture Layout – Building Heights [Drawing Number: AO1-PP-100]) and the Residential Amenity Plan (Design & Access Statement p.249). These are marked on the annotated plans below.



## Conclusion

The existing Anglia Square sits like a cuckoo in the nest within the remarkable medieval core of the city, a comprehensive development that is regarded now by the vast majority of its citizens as a mistake of the 1960s. The success of the new scheme will be judged in the future not on what was there before, or the previous refused scheme, but the quality of the new development that is built. The public inquiry has presented the owners and developer of this site with a unique opportunity and responsibility to build a high-quality development of an appropriate scale that fits within its historic conservation area context. We are concerned that the plans presented do not achieve this aim, and do not reflect the high importance that the Secretary of State placed on heritage and design issues in his decision.

SAVE objects to these proposals on grounds that the scale, massing, and density of blocks proposed will cause substantial and unjustified harm to the character of the Norwich City Centre Conservation Area. Notwithstanding the three outstanding listing applications, we consider the demolition of undesignated heritage assets proposed under the scheme to be unacceptable and substantially harmful to the conservation area.

We also consider the total number of units proposed to be excessive for this site, with the number of single aspect home unacceptably high, especially for a scheme in receipt of substantial Homes England grant funding. The mix of unit sizes fails to accord with the objectively assessed housing needs of central Norwich, with insufficient information provided in the plans regarding the amount and management of private and public amenity space proposed for these units. Inconsistencies pertaining to buildings heights in the planning documentation provided, as highlighted above, also require clarification.

For these reasons, we consider the plans to be in contravention of national and local planning policy for the protection of Norwich's historic environment and the provision of appropriate housing density, types and design. We therefore call on the Local Planning Authority to refuse planning permission for the scheme in its current form.

I trust that these comments are useful to you and will be fully considered and weighed in view of the substantial harm being caused and I ask that you keep me informed of further decisions or consultations regarding this application.

Yours sincerely,



**Benedict Oakley**

Conservation Officer, SAVE Britain's Heritage