



NORWICH
City Council

Planning applications committee

Date: Thursday, 06 December 2018

Time: 09:30

Venue: Council chamber, City Hall, St Peters Street, Norwich, NR2 1NH

Committee members:

Councillors:

Driver (chair)

Maxwell (vice chair)

Bradford

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Henderson

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If you would like this agenda in an alternative format, such as a larger or smaller font, audio or Braille, or in a different language, please contact the committee officer above.

Agenda

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1 Apologies

To receive apologies for absence

2 Declarations of interest

(Please note that it is the responsibility of individual members to declare an interest prior to the item if they arrive late for the meeting)

3 Application no 18/00330/F - Anglia Square including land and buildings to the North and West Norwich 5 - 164

Please note that members of the public, who have responded to the planning consultations, and applicants and agents wishing to speak at the meeting for item 4 above are required to notify the committee officer by 10:00 on the day before the meeting.

Further information on planning applications can be obtained from the council's website:

<http://planning.norwich.gov.uk/online-applications/>

Please note:

- The formal business of the committee will commence at 9.30;
- The committee may have a comfort break after two hours of the meeting commencing.
- Please note that refreshments will not be provided. Water is available
- The committee will adjourn for lunch at a convenient point between 13:00 and 14:00 if there is any remaining business.

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Date of publication: **Wednesday, 28 November 2018**

| | | |
|----------------------------|--|-------------|
| Report to | Planning applications committee | Item |
| | 6 December 2018 | |
| Report of | Head of planning services | 3 |
| Subject | Application no 18/00330/F - Anglia Square including land and buildings to the North and West Norwich | |
| Reason for referral | Objections / major development raising issues of wider than local concern | |

| | |
|-------------------------|---|
| Ward: | Mancroft |
| Officer contacts | Graham Nelson – Head of planning services Tracy Armitage – Senior planner tracyarmitage@norwich.gov.uk |

| Development proposal | | | | |
|--|---|--------|---------|---------|
| Part Full/Outline application for the comprehensive redevelopment of Anglia Square and adjacent land on Edward Street for: up to 1250 dwellings, hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship and associated works to the highway and public realm areas | | | | |
| Representations summary | | | | |
| | Total | Object | Comment | Support |
| Representations* | 930 | 767 | 42 | 120 |
| Petition 1 | Cathedral Magdalen & St Augustine's Neighbourhood Forum Steering Group - 554 signatures | | | |
| Petition 2 | St Augustine's Community Together Residents' Association – 609 signatures | | | |

*includes multiple representations from a single household and from individuals

| Main issues | Agenda page no |
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| Recommendation: Approve , subject to outcome of referral to National Casework Unit, S106 Obligation and the imposition of planning conditions | |

The site and surroundings

1. The application site measures approximately 4.5 hectares and includes three parcels of land. Most of the application site comprises the existing Anglia Square Shopping Centre and associated adjoining land (4.11 hectares). This parcel forms an island of land and buildings enclosed by St Crispin's flyover, Pitt Street, Edward Street and Magdalen Street. Two small parcels of land are located to the north of the main site and comprise two separate areas of open land adjacent to Edward Street and west of Beckham Place.
2. The main site is currently occupied by the Anglia Square Shopping Centre, Sovereign House, Gildengate House, retail and other mixed use properties, including a chapel (Surrey Chapel), fronting St Crispins Road, and surface level car parking. This part of the site also contains St Botolph Street and Cherry Lane and a service road for Anglia Square called Upper Green Lane.
3. Anglia Square was extensively redeveloped during the 1960s and 1970s following the construction of St Crispins Road. The urban renewal scheme comprises a precinct of retail, leisure and office units and buildings. The existing shopping centre has a range of retail units including large format stores occupied by QD, Iceland and Poundland and smaller units occupied by a mix of national and independent retailers. At the upper level there is an operational 4 screen cinema and a multi-storey carpark (closed), both accessed via St Crispins and Upper Green Lane. Sovereign House and Gildengate House are substantial multi-storey office buildings 6- 7 storeys in height. Sovereign House was formerly occupied by Her Majesty's Stationary Office (HMSO) and at one time around 1000 office workers were based there. Neither of these buildings have been used as offices since the late 1990s. Gildengate House is currently used as temporary studio space by artists whilst Sovereign House has remained unused, fallen into disrepair and has become visibly dilapidating over the years.
4. Within the south western sector of the main site is Surrey Chapel Free Church and a number of premises fronting Pitt Street. These buildings are occupied by a number of businesses and social enterprises including Men's Shed, Farm Share, Print to the People and a car wash.
5. The application includes two smaller sites, to the north of and separated from the main site. The western of the two smaller sites fronts New Botolph Street and Edward Street (0.27hects). The eastern of the two sites lies north of Edward Street, to the west of its junction with Beckham Place (0.13hects).
6. The eastern part of the main site is bounded by Magdalen Street fronted by predominantly two and three storey older buildings with retail units at ground floor level, as well as a large four storey late 20th century building immediately opposite, accommodating Roy's department store, a post office and Riley's Sports Bar. The former Barclays bank on the corner of Magdalen Street and Edward Street is connected to the shopping centre structure but excluded from the application. Magdalen Street is a key route taking vehicular and pedestrian traffic from the northern suburbs into the city centre, under the St Crispin's Road flyover. A number of bus stops are located on Magdalen Street adjacent to the flyover. Opposite the north-eastern corner of the Site, at the junction of Edward Street and Magdalen Street, is a doctor's surgery (The Gurney Surgery) and a pharmacy.

7. To the north of Edward Street, the area surrounding the land west of Beckham Place includes a variety of generally large scale buildings, including Dalymond Court, (a pair of four storey residential apartment buildings) to the west, and the three storey Epic Studios building to the east.
8. The area to the northwest of the site is largely residential in character, comprising predominantly two storey 19th century terraced houses. St Augustine's Street, is lined with older two storey properties many of which have retail / commercial uses at ground floor. Many of the properties on St Augustine's Street and connecting streets (e.g. Sussex St) are statutorily or locally listed. To the northwest of the junction of New Botolph Street and St Augustine's Street is St Augustine's Church (Grade I listed) the only surviving medieval church north of St Crispins. To the south of the church is a distinctive Grade II Listed terraced timber-framed residential terrace 2-12 Gildencroft. To the south of the terrace is Gildencroft Park which includes a large children's play area. Adjacent to the park there is a collection of commercial properties located towards the roundabout with St Crispins Road, on the west side of Pitt Street.
9. To the south of Anglia Square is St Crispins Road which is fronted by larger scale commercial buildings (up to 6 storeys) along with Grade II Listed Doughty's Hospital. This listed building, comprises two storey 19th century terraced almshouses for the elderly, built around a central garden.

Constraints

10. **Historic environment:** The application site is located within the City Centre Conservation Area (Anglia Square character area) and is in the vicinity of the Northern City and Colegate character areas. It also falls within the Main Area of Archaeological interest.
11. The site lies in the vicinity of a number of statutorily and locally listed buildings, including several buildings in Magdalen Street and at the junction of Pitt Street and St Augustine's Street. The closest Listed Buildings are Doughty's Hospital (Grade II, located immediately to the south of St Crispin's Road, opposite Upper Green Lane), and 75 Magdalen Street (Grade II, located immediately adjacent to the site on the opposite side of Magdalen Street), St Augustine's Church (Grade I) and the Gildencroft cottages (Grade II, adjacent to St Augustine's Street). Buildings 43-45 Pitt Street are locally listed. There are three Grade I listed churches nearby, to the east St Saviour's and to the south of St Crispin's Road: St Martin at Oak and St Mary's Coslany.
12. **Flooding and drainage:** Anglia Square is located relatively close to the existing watercourse of the River Wensum that flows through the City Centre. Based on the Environment Agency's flood risk mapping data, the site is located within Flood Zone 1 and thus has a low probability of flooding. It is also located in the Norwich Critical Drainage Catchment Area.
13. **Landscape and trees:** the site includes a group of ten London Plane trees and two lime trees fronting onto St Crispin's Road
14. **Large District Centre:** The main site falls within Anglia Square, St Augustines and Magdalen Street Large district centre identified in the Development Plan

Relevant planning history

15. The site now occupied by Anglia Square was originally cleared as part of the construction of the inner ring road (St Crispins Road) in the 1960s and included the clearance of land to the west of the shopping centre across to Pitt Street and St Augustine's Street. The original planning consent for Anglia Square included the shopping centre, cinema, car park and offices. Additional phases of development were designed for the western part of the site but never built, and much of this land has remained open and undeveloped since the site was cleared and is in use as surface car parking.
16. Planning consent was granted in October 2009 (08/00974/F) for comprehensive regeneration of Anglia Square and its environs for mixed use development, including approximately 200 residential units, a foodstore (clarify size), a bridge link from St. Crispins, a health centre, the potential relocation of Surrey Chapel, and enhancement of landscaping including an enlarged square. The proposal for redevelopment included the demolition of all the units along Pitt Street (including the locally-listed buildings), Surrey Chapel, Sovereign House, Gildengate House, some of the units around the Square, and the removal of Botolph Street and the twelve trees and open space adjacent to St Crispins Road.
17. A phased planning consent was granted in March 2013 for the comprehensive redevelopment of Anglia Square including land and buildings to the north and west of the Square (applications reference 11/00160/F, 11/00161/F). The first phase proposals were for mixed use development, including an enlarged Anglia Square, a new 7,792 sqm foodstore, supported by 507 car park spaces, amendments to the current access arrangements including enhanced pedestrian, cycle, public transport accessibility, a bridge link from St Crispins Road, and closing of the subway under the same. The application also included additional retail and other town centre uses (Class A1, A2, A3, A4) totalling 3,565 sqm net, a crèche (Class D1) and up to 91 residential units (Class C3) in mixed private/housing association use. Outline planning permission was also granted for 16 housing association units on land west of Edward Street.
18. Planning consents were also granted for later phases of development in this area and included additional retail and food and drink uses (Class A1/A3) totalling of 2,985 sqm; rooftop parking providing 99 spaces and 29 private flats with temporary car parking; external refurbishment of Gildengate House offices and improvement to existing office entrance; additional retail and food and drink uses (Class A1/A3) of 2,094 sqm and the provision of a gym (Class D2) of 1,478 sqm.
19. Two further planning permissions were granted to facilitate the delivery of the development as set out above (references 11/00162/O and 11/00163/C).
20. The St Augustine's gyratory system, as required by condition 15 of planning permission 08/00974/F was completed resulting in the commencement of this consent. All the other planning permissions have expired.

The proposal

21. The application proposes substantial demolition of existing buildings on the site and a mixed use redevelopment scheme including up to 1250 dwellings (with 70 in a 20 storey tower); up to 11,000 sqm Gross External Area (GEA) of flexible retail/

commercial/non-residential institution floorspace; a replacement cinema; a replacement multi-storey public car park; a new purpose-built facility for Surrey Chapel; and a hotel.

22. The entire application is submitted as a 'hybrid' planning application; the initial phase of development (phase 1) and the tower are submitted in 'detail' with the remainder submitted in 'outline'.
23. The proposal has been amended since first submission. A number of amendments have been made, including the reduction in the width and height of the tower, lowering from 25 to 20 storeys. The table below provides a summary of the amended scheme. Note that the quantum of development stated are maximum figures and indicative in respect of the outline elements of the proposal.

24. **Summary information**

| Proposal | Key facts | | |
|--|--|---------------------------------------|---|
| Residential | | | |
| Total no. of dwellings | 1209 (flexibility for up to 1250) | | |
| Dwelling types | 1200 flats (637x 1 bed , 563 x 2 bed) 9 x 3 bed houses (Block B) | | |
| No. of dwellings meeting Part M4(2) Accessible and Adaptable Dwellings | 10% of total : 120-125 | | |
| | Timetable for construction (indicative) | Total no of dwellings in phase | No of affordable dwellings in phase (based on maximum no of dwellings in each phase) |
| Phase 1:Block A (detail) | 2019 - 2023 | 323 | 0 |
| Phase 2:Blocks C,D,E,F (tower in detail) | 2021-2025 | 474 | 95 |
| Phase 3:Block GH | 2023-2027 | 319 | 0 |
| Phase 4:Blocks J, B | 2025-2027 | 93 | 25 |
| Details of affordable dwellings | Min of 120 111 x 1 bed flats and 9 x 3 bed houses Ratio of 85:15 social rent: intermediate tenure = 102 social rent and 18 intermediate (1 bed flats) | | |

| Proposal | Key facts |
|---|---|
| Commercial development | |
| Flexible use A1/A2/A3/A4/B1/D1/sui generis | Total – 11,000sqm GEA (9850sqm Gross Internal Area (GIA)) Flexibility for up to 6580sqm of the total to be used for offices (B1) |
| Flexible discounted commercial floorspace | 1150sqm GEA (within 11,000 GEA total) |
| Hotel | 11,350sqm (located in block F) |
| Cinema | 3400sqm (located in block G/H) |
| Other | |
| Public multi-storey car park (MSCP) | 600 spaces (Block A) |
| Replacement Surrey chapel | Site north of Edward Street |
| Public toilets + Changing Places facility | Located in block A |
| Appearance | |
| Principal materials | Brick (red, dark and pale), light cladding. |
| Energy and resource efficiency measures | <ul style="list-style-type: none"> Residential: Fabric first approach: Energy efficiency measures for the residential units will achieve a 11.63% reduction in energy demand and 8.00% reduction in CO2 when assessed against the 2013 Building Regulations. These measures will include the use of construction materials selected for their thermal performance. Commercial - ASHP's for non-residential heating and cooling, 18% of the required energy for the whole development in kWh would be delivered by renewable technology. |
| Operation | |
| Ancillary plant and equipment | Internal plant rooms Roof top plant |

| Proposal | Key facts |
|--------------------------|---|
| Transport matters | |
| Vehicular access | <p>Edward Street:</p> <ul style="list-style-type: none"> • Main vehicular access to the proposed Multi Storey Car Park (MSCP) – 600 public parking spaces plus 300 residential spaces • Service yard access – located in the same location as the existing service yard. This will serve the retail units in the Northeast block and residential units in Block A • Reconfigured junction with new Botolph Street and new crossing facility • Widening of existing shared surface (Edward Street North) • New laybys for taxis, car club and servicing <p>A147 St Crispins Road</p> <ul style="list-style-type: none"> • The existing St Crispins Road access from Upper Green Lane would be ‘stopped up’ and bridge demolished. • A new vehicular access proposed is proposed providing access to a decked residential car park and the existing service yard for the retail development at Anglia Square. • Widening of existing pavement to from shared surface <p>Pitt Street</p> <ul style="list-style-type: none"> • Access from Pitt Street to residential car park within block E/F would be via a ‘left in/left out’ junction arrangement • Provision of two layby for drop off/pick-up/loading/servicing <p>New Botolph Street</p> <ul style="list-style-type: none"> • Access for service and emergency vehicles would be provided in the form of dropped kerbs on New Botolph Street into the pedestrianised area • Vehicular access into the proposed site will be strictly controlled. The perimeter access into the site will be protected by retractable bollards or similar, which could potentially be fob controlled for the purposes of allowing the front door servicing/emergency vehicle access. • Provision of lay-by for taxi ‘drop-off’ and ‘pickup’ |
| No of car parking spaces | <p>Public MSCP - 600 spaces over 5 decks 546 – Standard Parking Bays 18 – Parent and Child Bays 36 – Disabled Bays 3 – Electric Charging Points (ECP) 22 - Motorcycle spaces</p> |

| Proposal | Key facts | | | | | | | | | | | | | | | |
|--|---|-------|-----------------|------|---|----|----|------------|---|---|-----------|---|---|-------------|----|----|
| | <p>Total residential car parks up to 910 spaces –</p> <p>Block A 333</p> <p>Block B 14</p> <p>Block E/F 290</p> <p>Block G/H 273</p> <p>subject to monitoring with possible reduction in later phases</p> <p>Commercial (block E/F) 40 spaces</p> | | | | | | | | | | | | | | | |
| <p>Electric vehicle charging (residential)</p> | <table border="1" data-bbox="564 734 1225 1055"> <thead> <tr> <th>Block</th> <th>On construction</th> <th>2030</th> </tr> </thead> <tbody> <tr> <td>A</td> <td>20</td> <td>40</td> </tr> <tr> <td>C (houses)</td> <td>9</td> <td>9</td> </tr> <tr> <td>C (flats)</td> <td>1</td> <td>2</td> </tr> <tr> <td>E/F and G/H</td> <td>30</td> <td>60</td> </tr> </tbody> </table> <p>Residential car park – On construction 60 spaces will have direct access to a charging point. Scope to increase to 111 spaces by 2030</p> <p>In addition each residential car park will have 2 x communal fast charge points</p> | Block | On construction | 2030 | A | 20 | 40 | C (houses) | 9 | 9 | C (flats) | 1 | 2 | E/F and G/H | 30 | 60 |
| Block | On construction | 2030 | | | | | | | | | | | | | | |
| A | 20 | 40 | | | | | | | | | | | | | | |
| C (houses) | 9 | 9 | | | | | | | | | | | | | | |
| C (flats) | 1 | 2 | | | | | | | | | | | | | | |
| E/F and G/H | 30 | 60 | | | | | | | | | | | | | | |
| <p>No of cycle parking spaces</p> | <p>Commercial (staff) – Up to 240 secure/covered spaces – distributed across the development</p> <p>Public - 92 spaces within public realm areas</p> <p>Provision for a max of 1372 covered/secure spaces – distributed across the development in locations directly adjacent to each residential entrance lobby</p> <p>On construction 75% of the required provision, based on DM31 Monitoring of cycle parking in block A will inform provision within subsequent blocks.</p> | | | | | | | | | | | | | | | |

| Proposal | Key facts |
|------------------------|--|
| Servicing arrangements | <p>Blocks A - Designated covered service area and service lay-by on Edward Street</p> <p>Block E and F – 2 service bays on Pitt Street</p> <p>Block G and H – On site service area</p> <p>New routes through the site will be open to service vehicles for 'front door' servicing of commercial floorspace</p> |
| Refuse arrangements | <p>Designated commercial bin stores</p> <p>Designated residential bin stores - The proposed strategy is designed around weekly collections with the additional collection by a private operator/arrangement funded by the on-site residential management body</p> |

Detailed Element (Block A and Tower)

25. The detailed element of the planning application comprises an area of 1.8 ha and seeks full planning permission for the following:
- Demolition of the multi-storey car park, cinema and associated ground and first floor elements of this sector of the shopping centre
 - 428 residential dwellings (Use Class C3); (with block A and the tower)
 - 4,420 sqm GEA flexible ground floor retail, services, food & drink and non-residential institution floorspace (Use Classes A1/A2/A3/A4/D1/Sui Generis (bookmakers and/or nail bars, up to a maximum of 550 sqm within the entire scheme); 380 sqm GEA ground floor flexible commercial floorspace (Use Classes A1/A2/A3/A4/B1/D1);
 - Public conveniences with disabled and Changing Places facility
 - Multi-storey car park with associated means of access, car parking, landscaping, service infrastructure and other associated works and improvements; and
 - Public realm spaces comprising 2 squares and 2 streets.
26. Block A comprises a large single block which would occupy the north western sector of the site. The block would result in the creation of new street frontages on to Edward Street and Magdalen Street and would face a reconfigured Anglia Square and Sovereign Way. The block varies in height from 4 storeys (fronting Magdalen Street) up to 11 storeys within the site. The ground floor of the block is entirely within commercial or 'back of house' function (service yard; stair cores etc). The upper levels of the block comprise multi-storey public and residential

parking and 323 residential apartments. Communal rooftop residential garden areas are shown at levels 3 and 7.

27. In design terms, Block A is proposed as a 'Mansion Building' typology as detailed within the Design & Access Statement (DAS), utilising brick cladding on the facades. Brick feature banding is proposed to express grouping and parapet edges. A variation in architectural treatment is proposed to distinguish different parts of the building - 'townhouses' on Magdalen Street, two mansion types and the multi-storey car park. Residential balconies are proposed comprising perforated metal, glass or railings, subject to their location and character area. Upper storeys of block A include setback elements. It is proposed that these are constructed in lightweight cladding. The multi-storey car park would be visible on the Edward Street frontage - perforated panels are proposed across this frontage. Sections of green walling are shown at ground floor level fronting Edward Street.
28. The residential tower is also included in the detailed element of the scheme and forms part of Block E/F although it will not be built until Phase 2 of the development. With reference to the Design and Access Statement the tower is proposed as a high quality "marker" building at the heart of the development. It is intended to serve to reinforce a sense of place and make a contribution to Anglia Square's identity within Norwich. The DAS Addendum indicates that the revised tower is proposed as a more slender addition to the Norwich skyline than the original and is designed to have a relationship with the aesthetic character of Norwich. Consequently, a pale coloured brick is proposed as the primary material influenced by the colours of the local brick and of the Castle and Norwich Cathedral. In response to 'the rich cultural and aesthetic history of patterns and textures that can be found in Norwich' a series of brick patterns are proposed at the higher levels of the tower. This theme is continued with designed columns of projecting glazing bars features.
29. Phase 1 of the proposed development includes the provision of landscaped areas and new public realm including the reconfigured Sovereign Way, Anglia Square and Botolph Street running east-west across the site as far as the new St George's Street running north-south, which will be included as a route for pedestrians and cyclists but not to its full width. It is anticipated that the public space in the new Anglia Square will provide opportunities for events, street entertainment and seasonal markets, as well as sheltered seating to allow year-round use. An additional public square is proposed on new St Georges Street. This is referred to as St George's Square and intended to create a civic heart to the development and to provide a focal point for the bars and cafes.
30. The new Botolph Street and St George's Street will provide enhanced pedestrian and cycle routes through the development, to be completed partly in Phase 1, and will incorporate street furniture and landscaping, reached by improved crossings over the surrounding road network. Highway schemes, including landscaping are proposed on Magdalen Street, Pitt Street, Edward Street, New Botolph Street and St Crispins Road. The width of the foot way on Magdalen Street will be increased by the setting back of block A and the removal of a building over-hang.

Outline Element

31. The outline element of the planning application comprises an area of 2.73 ha, and seeks outline planning permission for the following:
 - A maximum of 822 residential dwellings (Use Class C3), including the refurbishment and change of use of Gildengate House from office to residential. At least 120 of the above dwellings will be affordable housing, with a tenure split of 85% social rented and 15% intermediate tenure;
 - 11,350 sqm GEA hotel (Use Class C1);
 - 5,430 GEA flexible retail, services, food & drink and non-residential institution floorspace (Use Classes A1/A2/A3/A4/D1/Sui Generis (bookmakers and/or nail bars, up to a maximum of 550 sqm);
 - 770 sqm GEA flexible commercial floorspace (Use Classes A1/A2/A3/A4/B1/D1);
 - 3,400 sqm GEA cinema (Use Class D2);
 - 1,300 sqm place of worship (Use Class D1); and
 - Associated means of access, car parking, landscaping, service infrastructure and other associated works and improvements.
32. All of the above floorspace figures are given as maximum Gross External Area (GEA), thereby identifying the maximum development envelope and amount of floorspace to be delivered in each development parcel.
33. The outline submission is supported by a number of parameter plans relating to:
 - Proposed building height (no of storeys)
 - Land use – at all level
 - Access
 - Development parcels
 - Public realm
34. The broad location of the proposed uses is identified in the parameter plans submitted in support of this application (specifically, drawings A01-PP-200 – 207), thereby giving an indication of the types of uses that are proposed to come forward within the frontages of the various blocks.
35. The ground floor frontages on the main site will accommodate a range of potential retail/commercial and other main town centre uses, The upper floors of each block on the main site (with the exception of some double height/ first floor voids for retail/ commercial uses) will accommodate the residential dwellings proposed. The final residential mix will be determined through subsequent Reserved Matters applications.
36. The southwestern part of Block F will accommodate a hotel which would include a range of business facilities and a restaurant and bar open to the public, located at roof level to take advantage of the city centre views.

Representations

37. Advertised on site and in the press. Adjacent and neighbouring properties have been notified in writing. 939 representations have been received citing the issues

as summarised in the table below. Representations made via the Council's website are available to view in full at <http://planning.norwich.gov.uk/online-applications/> by entering the application number. Those made in writing on the second consultation are held on file but cannot be viewed on-line as they contain personal information in accordance with the General Data Protection Regulations 2018.

| Issues raised | Response |
|--|--------------------------------|
| <p>Does not constitute sustainable development</p> <p>Creates a threat and burden to future generations</p> <p>Does not respond well to the:</p> <ul style="list-style-type: none"> • local socio-economic context, • the historical context and the importance of Norwich city centre's heritage; • the infrastructure limits of the site and needs of the adjacent communities • the demands of the local housing market <p>Will impact negatively on the communities and context of North central which future generations will have to remedy, whether through expensive adaptation or rebuilding</p> <p>Development fails to meet strategic objectives</p> | <p>See Main issues 7 and 8</p> |
| <p>Impact on the existing community</p> <p>No indication that the development will be used to bring benefits to those in lower income and deprived communities</p> <p>Will displace the strong, vibrant, diverse and marginalise community that makes Anglia square and the surrounding area a home</p> <p>Development should enrich not alienate people who live there</p> <p>Designed to maximise profit not offer local people facilities they need</p> <p>Developers have not understood the special nature of the area and its inhabitants - insensitive and ill fitting</p> | <p>See Main issue 6</p> |

| Issues raised | Response |
|---|--|
| Gentrification not regeneration | |
| <p>Impact on local access to retail and services</p> <p>Development will replace much cherished independent/community retail capacity with retail activity from elsewhere</p> <p>Low cost/affordable shops the community rely on will be lost</p> <p>Magdalen Street and Anglia Square have a unique mix, including multi-cultural, small traders and creative outlets - this will be eroded.</p> <p>Shops and services in square serve a populous with low incomes, the elderly, people with low mobility – people who find accessing city centre difficult</p> | See Main issues 5 and 6 |
| <p>Quantum and character of proposed retail/town centre uses</p> <p>Level of proposed retail space is excessive/ over ambitious</p> <p>Likely to remain only partially let</p> <p>The proposals do not cater to the needs of current local residents</p> <p>Will attract high street retailers and compete directly with the city centre</p> <p>Question viability of a second boutique cinema</p> | See Main issue 5 |
| <p>Lack of community engagement</p> <p>Residents need to be fully engaged - full and open consultation – views sought first</p> | The applicant has submitted a Statement of Community Involvement setting out the details of the two consultation exercises |
| <p>Missed opportunity</p> <p>Missed opportunity to build a real community with decent low level housing, independent shops, adequate space for artist community</p> | |

| Issues raised | Response |
|---|------------------|
| <p>Lost opportunity for space for creative sector - high environmentally conscious standards</p> <p>Design something that reflects the diversity of the area and Norwich's creativity and artistic side.</p> <p>Lost opportunity for the arts - opportunity for new centre for the arts</p> <p>Highly accessible nature of the site to a wide catchment population should inform not only the commercial proposition but also the potential to service the social and cultural needs of a much wider catchment in a sustainable and equitable fashion</p> | |
| <p>Loss of Annes Walk</p> <p>Detrimental impact on businesses on Magdalen Street</p> | See Main issue 6 |
| <p>Proposed demolition</p> <p>Sovereign House should be retained as a good example of modernist architecture</p> <p>The demolition of the last two 19th century buildings on Pitt St is also short sighted.</p> <p>Extremely wasteful of resources</p> | See Main issue 7 |
| <p>Impact on Local business and enterprise</p> <p>Existing businesses will be forced to relocate</p> <p>Rental prices will increase - rents need to be affordable and guaranteed</p> <p>Development will put out of business the diverse range of small businesses</p> <p>Loss of independent shops and art scene not found elsewhere - development will sanitise the area</p> <p>No provision for small businesses to start up</p> <p>Community projects such as Men's Shed and Farm Share will be priced out</p> | See Main issue 6 |

| Issues raised | Response |
|--|-------------------------|
| Loss of low cost cinema | |
| <p>Disruption of existing businesses</p> <p>Impact on demolition on the operation of existing businesses (100 Magdalen Street)</p> | See Main matter 6 and 9 |
| <p>Impact on creative community</p> <p>The development will damage a vibrant and increasingly up and coming artist community</p> <p>Currently _approx.120 artists and designers have studios in the Square (at Outpost Studios and Cherry Lane Studios), another 100 or so use the Print to the People studios</p> <p>There has been no consideration for the artists or social enterprises. No attempt has been made to offer a diversity of units for 'live/work',</p> <p>Artist-led activity makes a significant contribution to the cultural landscape in Norwich and has helped Norwich gain recognition</p> <p>Norwich will lose its desirability as an amazing place to live, work and study which will in turn have a socio-economic impact on the city as a whole.</p> | See Main issue 6 |
| <p>Impact on Anglia Square 'Square'</p> <p>Important community/meeting space</p> <p>Loss of outdoor covered events space – only one in Norwich</p> <p>Inclusive space – serving local community many of which have low-incomes, low mobility/vulnerable in other ways</p> | See Main issue 8 |
| <p>Quality and type of new homes</p> <p>No demand for this number of flats in this location where infrastructure already strained</p> <p>Too much of the wrong type</p> <p>Should be a better mix of homes - more</p> | See Main issue 4 |

| Issues raised | Response |
|--|--|
| <p>family housing to promote balanced community</p> <p>Flats too small</p> <p>Will encourage investment /buy to let/short rent – will not meet local need</p> <p>Development will not encourage a community to exist</p> <p>The majority of apartments are single aspect with no provision for natural cross ventilation which is essential for healthy living.</p> <p>Corridors between elevators and apartments are long, with no natural daylight, and present at least one blind corner to every apartment</p> <p>Location will become a place of transiency - diminish and weaken the existing community</p> <p>Homes will be unaffordable to the local community</p> <p>Development may cause rental values to rise in this part of the city</p> <p>No consideration of homelessness in the local impact area</p> <p>Absence of opportunity for starter homes at affordable rent, appropriate housing for downsizers, extra care accommodation, family housing</p> | <p>All proposed dwellings will meet National Space Standards</p> |
| <p>Affordable homes</p> <p>10% of affordable housing unacceptable</p> <p>Norwich needs increased social housing</p> <p>Inadequate provision of social housing for families</p> | <p>See Main issue 2 and 4</p> |

| Issues raised | Response |
|--|---|
| <p>Social and affordable housing must be part of the first phase of building to ensure they actually do get built.</p> | |
| <p>Density</p> <p>‘Super-dense land use’ not suitable or justified in Norwich</p> <p>Does not create high quality living conditions</p> | <p>See Main issue 4 and 9</p> |
| <p>Economic impact</p> <p>Lack of economic assessment of the characteristics and opportunity of the area is a fundamental flaw in the urban design assessment</p> <p>Scheme ought to secure the creative and cultural industry potential of the area</p> <p>Further consideration of infrastructure and premises required to support the growth of the tech and creative businesses within the area</p> | <p>See Main issue 6</p> |
| <p>Delivery</p> <p>Risk of history being repeated - development starting then not completing</p> <p>Demolition of Sovereign House should be a priority</p> | <p>See Conclusion</p> |
| <p>Pressure on infrastructure</p> <p>Transport links /buses already under pressure</p> <p>Impact of this development and others in the vicinity on doctors, dentists, school spaces, parking</p> <p>Location already heavily congested</p> <p>Traffic will increase including delivery vehicles for refuse collection trucks, maintenance vehicles etc</p> | <p>See Main issue 6 and Transport section</p> |

| Issues raised | Response |
|---|-------------------------|
| <p>Design</p> <p>A development of this type is totally out of keeping for Norwich,</p> <p>Bland - identikit – out of place in such a historic city</p> <p>Soulless modern buildings stacked on top of each other</p> <p>Design not innovative – should reflect local area and materials</p> <p>Will turn a characterful part of town (albeit one which obviously needs a bit of love and attention) into a generic, over-crowded collection of concrete boxes.</p> <p>Design will date - eyesore of the future</p> | <p>See Main issue 7</p> |
| <p>Scale</p> <p>10-12 storeys inappropriate for the low rise surroundings and Norwich in general</p> <p>Totally out of keeping with the character of the area</p> <p>Will create canyons - cause issues of overshadowing within and outside the development</p> <p>Fortress like quality - rise above the rest of the city</p> <p>Will create unpleasant and dangerous downdrafts</p> <p>More suited to London</p> <p>Set precedent for tall buildings within the city</p> | <p>See Main issue 7</p> |
| <p>Tower</p> <p>Tower will dominate the skyline</p> <p>Tower will compete with Cathedral's elegant and slender spire</p> | <p>See Main issue 7</p> |

| Issues raised | Response |
|---|--|
| <p>Cathedral will lose its iconic and historic prominence in the cityscape</p> <p>Jarring, ugly presence</p> <p>Tower not a 'signature building'</p> <p>A more daring design could be a feature</p> <p>Tower blocks are an eyesore and not great housing.</p> | |
| <p>Impact on the historic environment</p> <p>Will substantially and negatively impact upon city skyline, and the setting of Cathedral, Castle and a collection of Medieval churches which constitute heritage of national importance</p> <p>Development will have huge and detrimental impact over a massive geographical area - almost whole of the Conservation Area and beyond – far greater than the localised impact of existing Anglia Square</p> <p>Massing excessive, no relation to historic surroundings</p> <p>Great harm to the setting of many listed buildings</p> <p>One of the oldest parts of Norwich</p> <p>Impact on views from Catton Park, Grade II* Listed in the English Heritage Register of Park and Gardens of Special Historic Interest</p> <p>Impact on views from Waterloo Park</p> <p>In use/night time impact has not been considered</p> | <p>See Main issue 7</p> |
| <p>Environmental Impact</p> <p>Should be more consideration of use of green energy</p> <p>Scheme should discourage the use of cars, reducing pollution and noise and investing in</p> | <p>See Main issues 8, 10, 11 and section on Energy and water</p> |

| Issues raised | Response |
|---|---|
| <p>efficient, clean and affordable public transport.</p> <p>Excessive hard surfaces and runoff</p> | |
| <p>Lack of open space</p> <p>Lack of green space/space for nature</p> <p>Very little community space for outdoor performances and music</p> <p>Little consideration of the needs of children and the promotion of community cohesion</p> <p>This does not provide a humane living environment.</p> | See Main issue 8 |
| <p>Parking</p> <p>Under provision of parking</p> <p>Excessive parking for city centre location</p> <p>All parking should have electric re-charge facility</p> <p>New public MSCP would undermine Park and Ride</p> | See Main issue 10 |
| <p>Safety</p> <p>Concerns about fire safety: in the aftermath of the Grenfell Tower tragedy</p> <p>Concerns about the capacity – both, in terms of equipment and experience – of local fire services to deal with any major fires in a development of this height.</p> | <p>The applicant has submitted a Fire Safety Overview – in particular the following measures should be noted:</p> <p>All apartments will be provided with the provision of automatic sprinklers regardless of building height.</p> <p>The tower will be constructed in brick and have no external cladding</p> <p>All car parking decks will be fitted with dry risers to allow the fire service to have a supply of water without running hoses in from the outside.</p> |
| <p>Adverse impact on amenity</p> <p>Doughty's hospital – increased overlooking and lack of light</p> | See Main issue 9 |

| Issues raised | Response |
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| Overshadowing of adjacent residential properties – in particular to the north of the development sites | |
| <p>Impact on air quality</p> <p>Current air quality is poor and will be worsened by the development</p> | See Main issue 11 |
| <p>Construction impact</p> <p>Blight on the whole area for a considerable period</p> <p>Noise, dust and traffic</p> | See Main issue 10, 11 and Noise section |
| <p>Impact on Norwich as tourist destination</p> <p>Development will impact fundamentally and negatively on the overall proposition of Norwich City Council</p> <p>Negative impact on historic image of the city</p> | See Main issue 5 |
| <p>Loss of public toilets</p> | The amended plan includes the re-provision of public toilets(including disabled) and a Changing Places facility |
| <p>Cycle access</p> <p>No detailed cycle access</p> <p>North –South route obstructed by leisure square</p> <p>Poor planning of cycle access through the site.</p> | See Main issue 10 |
| <p>Visualisations</p> <p>Misleading, deceptive simulated views</p> <p>Digital visualisations do not replicate the way the development would be perceived by people using the area, because they are not capable of giving weight to the psychological effects of over-dominant buildings when glimpsed from distance</p> <p>Plans and visualisations fail to illustrate and assess ‘Any rooftop projections’ including mechanical equipment, lift overruns,</p> | The visualisations have been produced using the latest and most sophisticated available techniques to portray the visual effect of the proposals. All the locations from which the proposals have been visualised were agreed with the council and many added as a result of suggestions from the council, Historic England and the Norwich Society. These viewpoints present the proposals from places where the impact will be greatest and especially in relation to heritage assets. No attempt has been made to diminish or hide the |

| Issues raised | Response |
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| ventilation flues etc. | <p>considerable impact of the proposals. Inevitably an image on a page or a screen cannot fully replicate the experience gained by a person standing in the outdoors with actual buildings and public spaces in front of them. This is as true for existing buildings as proposed buildings. It is therefore important for a person attempting to understand the effect of a proposal to have stood in all the locations in order that visual images can be translated into reality on the ground. This has been done by the council and the applicants.</p> <p>The rooftop projections and plant are shown on the amended plans and visualisations that were recently consulted on</p> |
| <p>Contrary to Anglia Square PGN</p> <p>Contrary to the objectives and guidance set out in the PGN.</p> | See references throughout the report |
| <p>Over reliance of the council and District Valuer's responses on information provided with the application</p> | All reports submitted with the application are critically reviewed by professional officers. DVS has undertaken an independent assessment to verify assumptions made in the Viability Report |
| Comments in support | |
| <p>Need for development</p> <p>The redevelopment is absolutely vital for the prosperity and health of Norwich as a City.</p> <p>Current condition of Anglia Square unacceptable - abandoned and unsafe</p> <p>Norwich needs an injection of contemporary planning and build to show it's a force for business and living in a tough market place</p> | |

| Issues raised | Response |
|---|-----------------|
| <p>Real opportunity to shake up the area here, and create a genuine "Northern quarter" for Norwich and it is the most important redevelopment for a generation here in Norwich</p> | |
| <p>Need for new homes</p> <p>We need new homes in the city as a matter of urgency.</p> <p>Currently there is a lack of housing, both affordable social housing and city based rental/buyer properties in general. As a consequence the housing and rental market is massively over inflated and more homes can help to alleviate this.</p> | |
| <p>Design</p> <p>Site needs something big and Bold</p> <p>Many cities have old and new buildings</p> <p>Norwich needs to look forward not get stuck in the past</p> <p>May not be ideal but better than the existing situation</p> <p>Need new architecture and modern buildings</p> | |
| <p>Tower</p> <p>Will become a Norwich landmark</p> <p>Tower will compliment skyline</p> <p>It would mark a location close to the centre of the City where a community can live in this century</p> <p>Without tall buildings in the city / brownfield sites developers will continue to build on greenfield sites and increase urban sprawl.</p> | |
| <p>Development benefits</p> <p>Will encourage more people to visit rather</p> | |

| Issues raised | Response |
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| <p>than pass through</p> <p>Create a fresher, active and engaged neighbourhood</p> <p>This will increase footfall, income for businesses and prosperity of the area as a whole</p> <p>Jobs would be added to the local economy</p> <p>Increases permeability for pedestrians and cyclists commuting from the dense housing (to the north) into the City</p> <p>New development with new houses and new shops will bring pride to the area</p> <p>The landscaped roofs will make this a very special place for those who overlook them.</p> | |
| <p>Lost opportunity if development doesn't go ahead</p> <p>Take a decade or more for another developer to consider development of this scale</p> <p>Alternative of no development is much worse</p> <p>Norwich has fallen back in recent years</p> <p>Be left with a declining and increasingly unloved and unlive-in blot on our fine city.</p> <p>Objecting to this plan is not looking at the bigger picture or having Norwich's long term interests at heart</p> | |

Representations received from groups and bodies

38. **Castle Mall Shopping Centre (submitted on their behalf by GL Hearn)** – Object. They state that the application should be refused on the basis that the proposed development is contrary to the development plan by virtue of the quantum of retail, leisure and other town centre uses proposed within the centre. Anglia Square is identified as a large district centre and as such development of this scale is contrary to this role and function.
39. **Council for British Archaeology (CBA)** Object - Deeply concerned about the scale and massing of the proposed development and its impact on the surrounding area and the wider City.

40. The application site lies within the Norwich Conservation Area, an area of high archaeological potential and affects the setting of several local designated and non-designated heritage assets. The scale and massing of the proposed development will also impact on the wider City including the Norwich skyline which is dominated by the Listed Grade I Anglican Cathedral and other designated heritage assets.
41. It is hard to see how the development, based as it is, on structures more than existing heights, can be sensitive to character with the scale and massing that is proposed and the Policy Guidance Note vision. The CBA believes that this proposal should be scaled down and should deliver a more thoughtful enhancement of the area that better connects neighbourhoods and delivers place making opportunity suited to the character of Norwich rather than a financially viable quantum of development that is perhaps better suited to the London Docklands.
42. **intu Properties Plc** (submitted on their behalf by Pegasus Group) - No not object to the principle of the regeneration of Anglia Square. Raise significant concerns regarding the trading potential of the proposed class A1 floorspace – to the extent that it will compete with the primary retail area of the City Centre contrary to the Anglia Square PGN and adopted policy. Further representation submitted to the amended scheme restating serious concern and recommending the local planning authority impose a number of restrictive planning conditions.
43. **Cathedral Magdalen & St Augustine’s Neighbourhood Forum Steering Group:**
Object: to the planning application (to the original and amended scheme) on the following grounds:
- The scheme does not meet the test of ‘sustainable development’ set out in the National Planning Policy Framework
 - It substantially and negatively impacts upon the heritage townscape of the north city centre
 - It substantially and negatively impacts upon city skyline, and the setting of Cathedral, Castle and collectivity of medieval churches which constitute heritage of national importance
 - The bulk and density of the development is inappropriate and will overbear neighbouring areas.
 - The density proposed is inappropriate to Norwich and will overburden the city’s movement and social infrastructure
 - The housing affordability and mix is inappropriate to the location
 - The scheme may displace rather than consolidate the developing creative, cultural, tech and entrepreneurial businesses and organisations which are focused in the area.
 - The scheme fails to produce an optimal land use solution given the accessibility of the site to a wide catchment – i.e. so as to produce a genuinely sustainable land use response.
 - The architecture and urban design of the scheme is inappropriate to the context and to Norwich generally.
 - If given planning permission it would set a negative precedent for future development within the city of over-tall, over-dense development which would create a ‘floodgates’ effect.
 - The commitment of over £12M of public funding to a scheme should produce greater public benefit. In this case, the public purse is being asked to subsidise a scheme which will, overall, impact negatively on Norwich.

44. **Norwich Cathedral:** The Dean and Chapter welcomes the recognition of the need to redevelop Anglia Square and Sovereign House. However, the proposal seeks to impose an even greater and more disproportionate scale on this site, with six, ten and twenty five storey buildings forming a wall between the outer and inner zones of the city and dwarfing its immediate neighbours. There is the obvious danger that allowing this new development would create a new and yet more damaging precedent, potentially leading to a rash of tower blocks across the city.
45. The community around Magdalen Road and St Augustine's is currently one of the most dynamic and attractive areas of the city. Its affordability and its dense historic streetscapes (despite the disastrous flyover and Anglia Square) have attracted a lively ethnic mix, with tech entrepreneurs and artists contributing to a particularly youthful vibe. Norwich City Council are sponsoring the creation of a Vision 2040 document and action plan for the city, to celebrate the historic and the contemporary, youthful ambition and established values, the dynamism of tradition. This development speaks of none of these. It would overwhelm the distinctive, the local, and the vibrant . Confirmed continuing objection to the amended application.
46. **SAVE Britain's Heritage:** Strongly object to the revised planning application for this scheme. We consider that this proposal would cause substantial harm to the city of Norwich and its designated and undesignated heritage assets. This would be as a result of the impact of the new buildings on the city as a whole and the setting of many surrounding heritage assets. The application is in clear contravention of national and local planning policy and we recommend that it be refused.

Consultation responses

47. Consultation responses are summarised below the full responses are available to view at <http://planning.norwich.gov.uk/online-applications/> by entering the application number.

Anglian Water

48. No objection subject to imposition of condition. Confirm the foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre that will have available capacity for these flows; The sewerage system at present has available capacity for these flows via the solution provided and site must connect at indicated connection points to avoid detriment; recommend the imposition of a condition in relation to a surface water management strategy. No comment received to the amended plans.

Broadland Council

49. Support and encourages the re-use of this "brownfield" site. In addition, the incorporation of measures to improve access for pedestrians and cyclists, as well as road users, is supported. However, the development will be visible from within the Old Catton Conservation Area and Catton Park. Although the tower will not interrupt the planned vista from Catton Park towards the cathedral spire, it will be an addition to the city's largely historic skyline that could cause some minor harm to the wider setting of these assets. No comment received to the amended plans.

Broads Authority

50. Do not wish to make any comment on this application. The site is remote from the area of the Broads within Norwich and the proposal is unlikely to have a significant impact on the Broads. No comment received to the amended plans.

Cadent Gas

51. Cadent have identified operational gas apparatus within the application site boundary. The Applicant must ensure that proposed works do not infringe on Cadent's legal rights and any details of such restrictions should be obtained from the landowner in the first instance. No comment received to the amended plan.

Castle (GP) Partnership (doctor's surgery)

52. Comment. In general terms we support the redevelopment and regeneration of the area. We currently occupy a cramped and out-of-date building and have been trying to move into new premises for about ten years. We have received District Valuer and NHS England approval for the release of funds for the conversion of 40, Fishergate into a new surgery. The timescale for the project is for completion in early May 2019. This will provide substantially more accommodation than our current surgery. Within the refurbished premises we will have capacity to accommodate the additional patient registrations in Anglia Square, and this has been an important factor in obtaining the backing of NHS Norwich CCG and NHS England. (combined summary of comments made at both consultation stages)

Cathedral Fabric Commission

53. Object. (scheme as first submitted) The Commission wants to emphasise that it does not object in principle to the re-development of this site. Members are very supportive of good economic development. However, elements of this proposed development are of concern. The CFCE wishes to object to the scheme for the following reasons: 1. The 25-storey residential tower would have a harmful impact on the wider setting and views of a highly-listed heritage asset, Norwich Cathedral, and on the conservation area of which the Cathedral is the most pivotal feature; 2. The harm caused by the proposed tower would be exacerbated by the banality of its design. Cathedral spire, is 96m high, and the new tower appears from the elevational drawings to be around 86m high, and so almost 90% as tall. 3. Allowing the construction of a new tower of this height would create a precedent for further development on the same inappropriate scale. Under paragraph 132 of the National Planning Policy Framework the impact of a proposed development on the setting of a heritage asset should be given "great weight" in decision making. The Commission does not believe that the current plans give suitable weight to, or mitigation of this impact.

Civil Aviation Authority

54. Recommend that you consult with Norwich Airport. Whilst it is in the centre of Norwich City, it is within the Norwich Airport safeguarding area and the heights of the towers may require lighting. That will be for the Airport to decide.
55. I would also recommend that this proposal should be brought to the attention of the department responsible for maintaining the list and production of charting regarding tall Structures.

Environment Agency

56. No objection to the proposals subject to the imposition of planning conditions relating to; Contamination (preliminary assessment; site investigation; appropriate remediation and verification of the effectiveness of the remediation); No drainage systems for the infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning Authority; Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the local planning authority.

Historic England

57. Attached in full (appendix 2) Historic England strongly object to the application on heritage grounds and recommend that the City Council should refuse to grant planning permission. Despite the reduction in the height of the proposed tower the development would result in severe harm to Norwich's historic character, to the historic significance of the Norwich city centre conservation area as a whole, to several important spaces within it and to numerous scheduled monuments, listed buildings and registered historic parks, many of them designated at a high grade and some of European significance.
58. We consider that the application does not meet the requirements of the National Planning Policy Framework, and note in particular both that the Framework requires that economic, social and environmental gains should be pursued in mutually supportive ways through the planning system, and that the great weight it accords to the conservation of designated heritage assets should be greater the more important the asset or assets (paragraphs 8 and 193). In this case, the proposed development would cause severe harm to the historic environment, while the importance of the designated heritage assets whose significance would be harmed by the development rather than conserved could scarcely be greater.
59. In determining this application your Council should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the buildings or its setting or any features of special architectural or historic interest which it possesses and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
60. Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form and are minded to grant consent we will refer the case to the National Planning Casework Unit and request it to be called in for determination by the Secretary of State.

Local Enterprise Partnership

61. Support the planning application for the comprehensive redevelopment of Anglia Square (comment to application as first submitted). We believe the application provides a significant opportunity to regenerate the northern city centre area, creating an exciting iconic skyline for Norwich which will suitably reflect the modern ambitions of a digitally creative city and boost investor confidence in Norwich in the years to come. It will also provide much needed homes, facilities and supporting infrastructure for the Norwich community as well as the wider economy by providing a significant

number of construction and supply chain jobs during the re-development phases as well as a broader mix of employment and apprenticeship opportunities for residents in the longer term, further helping the area to regenerate through increased spend. The comprehensive redevelopment of Anglia Square will help deliver on the themes of the Norfolk and Suffolk Economic Strategy including Our Offer to the World, Driving Business Growth and Productivity and Driving Inclusion and Skills and as such we very much welcome the application by Weston Homes.

Magdalen Walks Group

62. Object. (comment to application as first submitted). Magdalen Walks was set up in 2016, its aim is to provide people with the opportunity to meet, develop new friendships and interests and take moderate, healthy exercise in the context of exploring the heritage of the northern city centre area. The group's constitution includes among its purposes to: represent the area's heritage and its residents as required by publicising, commenting and coordinating responses on planning, transport and any other proposed changes that may impact on the heritage of the area and the wellbeing of its residents.
63. We believe the proposed development plans contained in this planning application threaten to permanently destroy the character and appearance of the surrounding area and have a negative impact on the amenity of residents, workers and visitors to the area.
64. While agreeing that the Anglia Square does need development in its derelict, under-used and redundant areas, we feel that these plans are over-bearing, insensitive and alien. A major objection is to the unacceptable density, massing, bulk and height of the blocks proposed, contrary to the Adopted Norwich Local Plan (2014), Policy DM1 /DM2 and the Anglia Square PGN. We want to see a development of a scale and density appropriate to the surrounding area; that has a great mix of housing types, more affordable dwellings; more spaces for community, creative, entrepreneurial and recreational use; and that respects the character and heritage of the area and Norwich more widely.

MATA (committee on behalf of the Magdalen street area and Anglia square Traders Association and community group)

65. Comment to the scheme first submitted. The negativity and unrealistic requirements being put forward may see the prospective developers walk away again and we will not and cannot stay the same. It will be a disaster for the area if they do.
66. Costs are costs and to subsidise either means the need to make more on the main development to cover them. If you want affordable rents so local traders can afford the shops then the number of residential properties has to increase to cover the building costs.
67. Most importantly consider the existing buildings. Almost 50 years old and none of the previous owners carried out any real maintenance because they all had grander plans. Even after spending multi millions you might get another 10 years life. Who is going to invest millions with no hope of a return? Most likely given the staggering cost of demolition, Anglia Square will close totally and remain boarded up for who knows how many years. Then what will happen to the rest of the Magdalen St traders for like it or not Anglia Square is the magnet that draws people to the area.

68. If the current developers go any potential owner will look at the track record of previous development attempts and a rejection of this one will be another nail in the coffin for not just Anglia Square but this area as a whole.

Natural England

69. (Response attached at appendix 3b). No objection - subject to appropriate mitigation be being secured. We consider that without appropriate mitigation the application would: in combination with other housing developments in the Greater Norwich area lead to increased recreational pressures which would:
- have an adverse effect on the integrity of The Broads Special Area of Conservation (SAC), Broadland Special Protection Area (SPA) and Broadland Ramsar
 - damage or destroy the interest features for which the component Sites of Special Scientific Interest of the above sites have been notified.
70. In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required:
- on-site green infrastructure measures as described in the application documents should be secured; and
 - a proportionate financial contribution to the existing off-site GI and local GI initiatives, to help to reduce the effects of recreational pressures on designated sites.
71. We advise that an appropriate planning condition or obligation is attached to any planning

NHS (England)

72. Comment to application as first submitted. There are 12 GP practices and 3 branch surgeries within a 2km radius of the proposed development. The catchment practices cumulatively do not have sufficient capacity for the additional growth resulting from this development and proposed cumulative development in the area. However, plans are currently underway to relocate the Gurney Surgery to provide additional capacity to include primary and community care at this development.
73. In line with the Government's presumption for the planning system to deliver sustainable development and specific advice within the National Planning Policy Framework and the CIL Regulations, which provide for development contributions to be secured to mitigate a development's impact. NHS England would suggest that healthcare contributions should be sought to contribute to the provision of sustainable primary care services in the area, particularly for the additional residents generated by development growth. Funding will be sought via CIL as the opportunity allows development to contribute to the refurbishment and fitting out of new premises for the Gurney Surgery. Assuming the above is considered in conjunction with the current application process, NHS England would not wish to raise an objection to the proposed development.

Norfolk Access Group

74. Comment (to application as first submitted) - Changing Places Toilets: These toilets are for seriously disabled people for whom standard disabled toilets are inadequate. There should be at least one of these toilets, in addition to normal disabled toilets, in a publicly accessible place in this development and this should be done quite early on. Paths - ensuring that disabled people in wheelchairs & parents with buggies have smooth pathways along the main route. Buses - ensuring that there is good provision for improving the bus services in the area, especially by extending the space for bus stops on Magdalen Road. More public seating should be provided. The cinema: The accessible seating/wheelchair spaces. All units should be Disability Adaptable, whether they are residential, commercial, retail or whatever

Norfolk County Council Highways (strategic)

75. No objection subject to the imposition of conditions. The location of the development is close to the city centre and so is in a highly sustainable location with all facilities within easy walking and cycling distance. Whilst the development is adjacent to the strategic highway network, the traffic impact on the network will be minimal due mainly to reduced parking provision for the residential element of the scheme and the presence of a travel plan as well as its proximity to local facilities. The applicant has proposed off site highways to mitigate the impact of the development on the strategic highway network. A Construction Traffic Management will also be required.

Norfolk county planning obligations

76. **Education** - It is predicted that the development will generate demand for additional school places: early education age: 28, primary school age: 76, high school age: 50, sixth form age: 5. Taking into account the other developments in this area of Norwich (15/01927, 15/01527 and 12/00143) a total of 1534 dwellings (including the Anglia Square site) would generate an additional 87 Early Education age children, an additional 238 primary age children, an additional 159 11-16 age children and an additional 15 16-18 age children. Although there is spare capacity at high school level, there is insufficient capacity within the Early Education sector and at Magdalen Gates Primary School to accommodate the children generated by these developments. However, a new Free School (St Clements Hill Primary Academy) opened in September 2018 and will grow to become a 420 place primary school. Furthermore a purpose-built nursery on the Sewell Park High school campus site is currently being constructed and will accommodate the early education places needed.
77. We will therefore monitor pupil numbers and if further expansion is required will put in a claim for funding for additional places if necessary through CIL as this is covered on the District Council's Regulation 123 list.
78. **Library**: A development of 1,250 dwellings would place increased pressure on the library and mitigation is required to increase the capacity of the library service in Norwich. This could be through additional equipment and stock at existing facilities or a through a new building as part of the development.
79. **Fire Hydrant** provision will be required for the development
80. **Green Infrastructure** - Connections into the local Green Infrastructure (GI) network, including Public Rights of Way and ecological features, should be considered

alongside the potential impacts of development. Direct mitigation and GI provision should therefore be included within the site proposal. Mitigation for new and existing GI features identified as strategic shall be funded by the Community Infrastructure Levy (CIL) through the Greater Norwich Investment Programme.

Norfolk historic environment service

81. No objection subject to the imposition of a planning condition requiring a programme of archaeological mitigatory work in accordance with National Planning Policy Framework para. 141.

Norfolk police (architectural liaison)

82. Recommend adoption of the standards and specifications of 'Secured by Design'5 (SBD-PCPI) initiatives across the development. Vehicular access through the site and entry points should be restricted and it is recommended that Visual Deterrent Street Furniture (VDSF) should be used with other measures to offer protection from Hostile Vehicle threat.

Norwich Airport

83. No objection subject to conditions (amended scheme). Norwich Airport and its third-party agencies have completed a full safeguarding assessment of the proposed Anglia Square development. This includes the newly designed tower structure with slightly concaved sides and its lower overall height of 67.275m Above Ordnance Datum (AOD). Although the proposed structures have been safeguarded and are acceptable to Norwich Airport, we still find that certain elements cause us some concern. With this in mind, we would require that the conditions be applied to the grant of Planning Permission in relation to external lighting (flat glass, full cut-off design, and should be horizontally mounted to prevent light spill above the horizontal. This is to minimise the risk of these lights dazzling), and notification of mobile or tower cranes

Norwich City Council - Design and conservation

84. These are included within the assessment section of the report (Main issue 7)

Norwich City Council - Ecology

85. No objection, subject to the imposition of conditions in relation to : lighting; landscape scheme to include full details of green roofs, green routes; scheme for provision of bird and bat boxes.

Norwich City Council - Economic Development

86. Support. This re-development represents a highly significant inward investment in excess of £250million into Norwich by a high profile developer; in fact one of the largest ever. It is a statement of confidence in the city of Norwich which will boost the city's profile and its attractiveness to other inward investors. It is also hoped that ambitious redevelopment of a large, prominent site in the city will stimulate further investment and redevelopment of other sites in the city centre.
87. This development is also highly significant in terms of the message that it sends to the market – that Norwich is a dynamic, viable investment destination and that a large

scale stalled redevelopment site is being brought forward by a high profile business with a successful track record of delivery.

Norwich City Council - Environmental protection

88. **Noise:** The Environmental Noise Assessment (ENA) submitted by Stansted Environmental Services (SES) with regards to the Anglia Square Masterplan has been reviewed. On-site noise monitoring was carried out which aimed to characterise the environmental noise in the vicinity of the application site. There were a number of issues raised in my initial representations relating to the methodology of the noise assessment, installation of roof top plant and noise relating to the use of the proposed public square known as 'St. George's Square'. Most of my concerns have been addressed by SES. No objection subject to the imposition of conditions in relation to: further noise monitoring and noise assessment to verify detailed mitigation measures to be installed (with residential development); control over plant/equipment; submission, agreement and implementation of Construction and Environmental Management Plan (CEMP); for external use of the squares/spaces; hours restriction .
89. **Wind:** The methodology and conclusions presented in the report are considered sufficiently robust. The only apparent limitations being the fact that analysis does not take into account wind gusts effects. In addition there has been no detailed modelling for wind effects other than for winds from a general south-westerly direction. It is recommended that areas suggested to be more susceptible to higher wind speeds are assessed by the design team as the proposals progress and additional mitigation strategies considered, such as landscaping and canopies, in order to further improve pedestrian comfort.
90. **Air quality:** No objection subject to the imposition of conditions. As residential is proposed for all levels in Block B, including ground floor, this block will require robust mitigation. The report proposes mitigation measures for Block B which, in the absence of more definitive predicted NO₂ pollutant levels, would be considered appropriate. Mechanical ventilation or individual whole house ventilation systems with NO_x/NO₂ filters is recommended at ground floor receptor locations on Edward Street, New Botolph St & Pitt St. If the former mitigation is utilised, as a minimum, air inlets should be located at the rear of the buildings on which receptors B, G and H are positioned, furthest from the roadside, at the upper most roof level and air circulated down to the ground floor. As there is not predicted to be a breach of NO₂ objective levels for any of the first floor levels or above, no mitigation for air quality is required on any of these floors.
91. Exceedance of the 1 hour objective for NO₂ is predicted to occur at locations New Botolph St /Edward St junction and Magdalen St. As a result, mitigation measures are required in these areas to protect pedestrians.
92. Outdoor amenity space is mainly in the form of roof top gardens and seated areas within pedestrian streets within the centre of the development and hence would not be subject to elevated levels of pollution. Many of the proposed flats also face into the development and away from the roads or are on first floor elevations or higher and hence are not predicted to be at locations in breach of air quality objectives, including those with balconies.
93. It must be borne in mind that the predicted NO₂ levels are meant for indicative purposes and are not definitive. As such further air quality monitoring as the

development proceeds in order to ensure appropriate mitigation measures in respect of indoor air quality are incorporated into the detailed designs and so as to identify if further measures will be needed to improve outdoor air quality.

94. Mitigation during Construction /Demolition Phases. There are a range of mitigation measures which are appropriate for a development of this size and especially given the proposed length of construction. It is therefore recommended that mitigation measures are detailed in a planning condition.
95. **Contamination:** No objection subject to the imposition of conditions

Norwich City Council - Highways (local)

96. No objection on highway grounds subject to implementation of various highway improvement and mitigation measures.

Norwich City Council - Housing strategy

97. Comment: Development proposals for this large, north city, brownfield site are welcomed.
98. The housing and tenure mix largely meets need in this area of the city. The current affordable housing need in this area is for one bedroom flats, two bedroom houses and larger family homes (four or more bedroom). It is noted that the mix of housing comprises predominantly one bed flats. We have an ongoing and overwhelming need for one bedroom properties in the centre/north area and any development of this scale will help us to address this. We currently have 2,438 applicants on our Choice-based Lettings (Home Options) register requiring a social rent, one bedroom property. Of these, 647 are single people or couples registered in the NR3 postcode area. In order to address some of this need, we will design a Local Lettings policy. This will ensure that residents in housing need in the local impact area of the development will have the opportunity to benefit from the new homes.
99. The most suitable tenure to meet our housing need is social rent. Based on the values provided by the developer, Affordable Home Ownership, Shared Ownership and Shared Equity products do not meet our housing need. Although providing all of the 120 affordable dwellings at social rent would better meet our need, it is accepted that some form of intermediate tenure will be required to better meet policy, ensure a mixed and sustainable community and to safeguard against losses of numbers of dwellings due to the lower values that the developer can expect for social rent properties. It is therefore recommended that the developer provides the 15% intermediate tenure via either an Affordable Rent Tenancy model, which equates to up to 80% of market value rents, or some other version of Intermediate Rent. Again, the RP will be able to work with them on this.

Norwich City Council - Landscape

100. (Amended proposal) Overall the masterplan shows significant improvement at ground level and if the richness of detail is fully realised a series of interesting spaces could be delivered. At this stage the detail of the streetscene and podium gardens are interesting but lacking in tangible detail, which must be secured at the earliest opportunity. As block A will set the precedent for the whole scheme a fully detailed scheme should be presented securing a high level of hard landscape detailing in both the adopted and public realm. The podium gardens which will be so important to the

sustainable living of the residents should be fully detailed to ensure that the design intentions expressed in the landscape strategy documents are fully realised in the final plans

Norwich City Council - Natural areas officer

101. No objection subject to the imposition of planning conditions to secure biodiversity enhancement measures. The site has been described as being of low nature conservation value. No protected habitats have been found on site. Whilst the trees are protected by virtue of their location within a Conservation Area none have a TPO or bat roosts. As such the proposals largely represent biodiversity enhancements rather than mitigation.

Norwich City Council – Neighbourhoods and community

102. As it stands, the developers have committed to three strategies which could prove positive mitigations for some of the risks for local residents linked to the development:
- Training, skills and local labour strategy
 - Sustainable Community Strategy
 - Anglia Square Development Management Plan
103. It will be fundamental for the council to hold the developers to these commitments and offer guidance and an evidence base for the decisions and inclusions in these strategies collaboratively.

Norwich City Council - Tree protection officer

104. The loss of the mature plane and lime trees at St Crispins to facilitate the development and access road will be appropriately mitigated through the number of replacement trees proposed within the site, however the species selection are inappropriately small in comparison to the scale of the building.
105. Tree protection plan around the group of plane trees G2 shows a barrier and also a secondary fencing barrier – this area requires a detailed method statement to be able to evaluate the impact of the works within the RPA of the trees
106. Pollution hot spots identified could benefit from additional tree planting, it is important not to prevent dispersion but a single tree alone can reduce concentrations by 15 – 20%.

Norwich Cycling Campaign

107. Object (original submission) - There is likely to be a much greater increase in vehicle movements in the area than predicted by the developers, unless alternatives are made very attractive. The density, height of the buildings and the relative lack of space between the roads and the housing blocks surrounding the development will have profoundly negative impacts on the amenity for cyclists and pedestrians whether visiting the area, or travelling through it, with increased noise, wind and air pollution. The layout within the development means that routes will be narrow and congested around and through the site, bringing pedestrians, cyclists and service vehicles into conflict. Air pollution is already at levels hazardous to health. For people at ground level, shoppers, pedestrians, cyclists and employees in the shops there are no

proposed mitigation measures. The yellow Pedalway route through the site is not planned to meet any of the recognised design standards. We object to the provision of “shared use” cycle routes in a development. The closure of Anne’s Walk from Magdalen Street will concentrate the amount of pedestrian traffic through one entrance. It will also reduce the permeability of the site for pedestrians coming from Magdalen Street. Servicing vehicles sharing with pedestrians and cyclists: creates conflict. We object to the building of only 75% of the Local Plan required provision for the residential blocks.

Norwich Society

108. Object (amended scheme) - Our objections to the original scheme remain valid. The changes in this revised application are minor and the scheme retains the original density ambition that is far too high, resulting in a mass and scale of over-development that, combined with poor architectural design, would damage the unique character of Norwich.
109. Original submission - While welcoming the principal of demolishing the existing buildings on the site and re-developing Anglia Square, the Norwich Society believes that this application should be rejected for the following reasons:
- The application does not meet many of the policies or aspirations set out in the 2017 Planning Guidance Note and other key planning policies adopted by the local authorities after lengthy public consultations
 - The proposed density is far too high and the resulting mass and scale of development and poor architectural design would damage the unique character of Norwich
 - No relevant justification has been provided to support the level of harm that will be imposed on heritage assets local to the site nor the harm to sensitive and important views of heritage assets throughout the City
 - The proposed tower would spoil many valued views of the City and overpower neighbouring areas, as well as setting a precedent for more London-Docklands style developments unsuited to a city such as Norwich
 - The proposed residential provision fails to meet the needs of local people
 - The illustrations provided to show the impact of the development are misleading
 - The justification for the proposed hotel and level of retail provision is unclear and the latter may impact on the viability of businesses in Magdalen Street and elsewhere in the City
 - No proper provision for displaced artists and craftsmen has been guaranteed
 - Some of the key proposals to meet sustainability targets are flawed
 - The residential parking provision is too high for a well-serviced edge-of-city-centre site

- The phasing proposals mean that the most profitable elements will be built first, opening the potential for the whole development never to be completed and thus leaving a similar legacy to the existing incomplete Anglia Square
- No viability assessment has been provided, making it impossible to assess the developers' claims
- Overall, this proposal risks turning Norwich into yet another clone high-rise city, damaging its attractiveness for those who live and work here, for visitors, and for specialist and skilled staff considering moving to the City

Public Health (Norfolk County Council)

110. Do not want to object to or stop redevelopment of an area which has some high levels of deprivation and for which this could offer some employment and housing opportunities for existing local residents. We also recognise this is a brownfield site with a number of existing infrastructure and transport connections in place.
111. We are concerned that modelling of both current use and post-development use of the site indicates a number of locations which would fail to meet, air quality standards in terms of NO₂ and also fall above current recommended WHO measures for PM₁₀. Support ongoing monitoring of air quality (including particulate matter) during all phases of the construction and phased occupation with the ability to amend plans and designs as required. Also support an assessment of the impacts on the wider air quality adjacent the site, in particular St Augustine's Street. Priority is to reduce levels of pollutants. However we would agree that mitigation measures within new homes should be employed, that sensitive tree planting electric vehicle charging infrastructure should be installed and a CEMP for the duration construction
112. In order to tackle the identified assessed shortage of suitable housing we would support measures which offer a range of housing options and in particular affordable housing, including elements of social rented. We would assume that all tenures will be built and designed to the same standards of affordable warmth, space, natural light etc. We note that an estimated 14% of habitable rooms may not meet thresholds for natural light and would want this risk to be avoided as it can impact health
113. We would support joining up of East / West and North / South cycle routes and would also encourage proactive signposting for pedestrian and wheelchair access
114. We welcome that there is no request for additional provision of additional hot food takeaway permissions within the development
115. We support access to and provision of open spaces and encouragement of biodiversity

St Augustine's Community Together Residents' Association

116. Object (comment to application as first submitted). Current plans to redevelop Anglia Square are unneighbourly and antipathic to our community's identity and vision, well-being and sense of place. Concern over Lack of meaningful community engagement by the developer.

117. In combination with Cathedral Magdalen and St Augustine's (CMSA) Neighbourhood Forum steering group a Community Vision exercise has been undertaken.
118. The proposed development raises a number of concerns:
- The difficulty of access from St Augustine's during demolition and construction to the remaining shops in Anglia Square, and to the shops and buses on Magdalen Street
 - There was no precedent in Norwich for residential buildings of this height and density. The overall impact of the development from St Augustine's point of view would be oppressive, stressful and overbearing.
 - The architectural design of the buildings was too generic and commonplace and made no attempt to blend with the style and materials of Norwich buildings.
 - The loss of cherished views such as to the Cathedral, and the "hemming in", overbearing and over-looking local heritage buildings such as St Augustine's church and the Tudor cottages of the Gildencroft.
 - The loss of the distinctive Norwich skyline by the imposition of a 25-storey tower block almost as high as the Cathedral and much more massive at its top than the spire.
 - The commitment to offer no more than 10% (120) affordable houses in an area where there was an acute housing need, particularly for young families on low incomes.
 - The uniformity of the dwellings –.
 - The risk of loss of many of the area's independent, value and convenience shops and their replacement with expensive "life-style"
 - The impact on local infrastructure, including on roads surfaces, traffic congestion, air, light and noise pollution, on finite on-street residential and visitor parking spaces, on public transport, doctors, dentists, and schools of possibly 2000+ new residents in so compact an area.
 - Noise, dust, asbestos and vibration nuisances during demolition and construction phases spread out over possibly eight years (2019-27).
 - Uncertainty as to whether construction might be halted after one or two phases No certainly as to when the affordable dwellings would be built.

Assessment of planning considerations

Relevant development plan policies

119. **Joint Core Strategy for Broadland, Norwich and South Norfolk adopted March 2011 amendments adopted Jan. 2014 (JCS)**
- JCS1 Addressing climate change and protecting environmental assets
 - JCS2 Promoting good design
 - JCS3 Energy and water
 - JCS4 Housing delivery
 - JCS5 The economy
 - JCS6 Access and transportation
 - JCS7 Supporting communities
 - JCS8 Culture, leisure and entertainment
 - JCS9 Strategy for growth in the Norwich policy area
 - JCS11 Norwich city centre
 - JCS19 The hierarchy of centres
120. **Norwich Development Management Policies Local Plan adopted Dec. 2014 (DM Plan)**
- DM1 Achieving and delivering sustainable development
 - DM2 Ensuring satisfactory living and working conditions
 - DM3 Delivering high quality design
 - DM5 Planning effectively for flood resilience
 - DM6 Protecting and enhancing the natural environment
 - DM7 Trees and development
 - DM8 Planning effectively for open space and recreation
 - DM9 Safeguarding Norwich's heritage
 - DM11 Protecting against environmental hazards
 - DM12 Ensuring well-planned housing development
 - DM13 Communal development and multiple occupation
 - DM16 Supporting the needs of business
 - DM17 Supporting small business
 - DM18 Promoting and supporting centres
 - DM19 Encouraging and promoting major office growth
 - DM20 Protecting and supporting city centre shopping
 - DM22 Planning for and safeguarding community facilities
 - DM28 Encouraging sustainable travel
 - DM29 Managing car parking demand in the city centre
 - DM30 Access and highway safety
 - DM31 Car parking and servicing
 - DM32 Encouraging car free and low car housing
 - DM33 Planning obligations and development viability

Other material considerations

121. **Relevant sections of the National Planning Policy Framework July 2018 (NPPF):**
2. Achieving sustainable development
 4. Decision-making
 5. Delivering a sufficient supply of homes
 6. Building a strong, competitive economy
 7. Ensuring the vitality of town centres
 8. Promoting healthy and safe communities
 9. Promoting sustainable transport
 11. Making effective use of land
 12. Achieving well-designed places
 14. Meeting the challenge of climate change, flooding and coastal change
 15. Conserving and enhancing the natural environment
 16. Conserving and enhancing the historic environment
122. **Supplementary Planning Documents (SPD)**
- Affordable housing adopted March 2015
 - Main town centre uses and retail frontages adopted Dec. 2014
 - Open space & play space adopted Oct. 2015
 - Landscape and Trees adopted June 2016
123. **Other**
- Anglia Square Policy Guidance Note (PGN) adopted 2017
 - Northern City Centre Area Action Plan (2010) expired

Case Assessment

124. Planning law requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise. Relevant development plan policies are detailed above. Material considerations include policies in the National Planning Framework (NPPF), the Council's standing duties, other policy documents and guidance detailed above and any other matters referred to specifically in the assessment below. The following paragraphs provide an assessment of the main planning issues in this case against relevant policies and material considerations.
125. At pre-application stage the local planning authority screened the project that is the subject of this application as Schedule 2 development under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) with the potential to cause significant environmental effects and therefore 'EIA Development' under the EIA Regulations. The Council confirmed to the applicants that the proposal would need to be subject to an Environmental Impact Assessment (EIA) and an Environmental Statement (ES) would need to be prepared. The planning application therefore includes an Environmental Statement (ES) which considers the likely significant effects of the development on the environment. The issues included within the ES relate to matters identified by the LPA through a scoping exercise and include impacts on: highways, traffic and transport, built environment; archaeology,

noise, air quality, social - economic, European protected sites and townscape and visual.

126. Schedule 4 of the EIA Regulations set out what should be included in an ES including the scope of the assessment to include the consideration of direct effects and any indirect, secondary, cumulative, transboundary, short-term, medium-term and long-term, permanent and temporary, positive and negative effects of the development during the construction and operational stages. The EIA process also requires the consideration of reasonable alternatives (for example in terms of development design, technology, location, size and scale) studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effects. The findings set out in the ES are referred to throughout the report and the consideration of Alternatives is considered in para. 160-164 of the report.
127. In addition, chapter 12 (including various appendices) of the ES relates to the potential effects of the development on protected habitats. Under regulation 61 of the Conservation of Habitats and Species Regulations 2017 (often referred to as a "Habitats Regulation Assessment") the local planning authority is further required to carry a Habitats Regulation Assessment. This is addressed in Main issue 3 of the report.

Main issue 1: Principle of development

128. Key policies and NPPF paragraphs – JCS11, 19, DM12, NPPF sections 5 and 11.
129. Anglia Square is the most significant development opportunity in the northern part of the city centre and one of Norwich city council's most important priorities for regeneration.
130. Currently the site is significantly under-utilised and the shopping centre is tired and outdated. The degraded appearance of Sovereign House and the site in general is detrimental to the local historic townscape and a highly visible indicator of decades of dereliction and lack of developer interest in this part of the city. The site lies within the northern city centre where there are significant concentrations of deprivation. Development provides the opportunity to: deliver environmental enhancement through the remediation of derelict buildings; bring benefits to local people through the creation of new jobs, housing and an improved district centre; and boost the local economy through supporting existing businesses and the growth of new enterprise.
131. Significant inward investment in this site would be a statement of confidence in the city of Norwich and boost the city's profile and attractiveness to other inward investment. Key sites including Duke's Wharf, the former Jarrold's printwork site on Whitefriars and the adjacent Barrack St site, St Mary's Works on Duke Street, and St George's Works are all within approx. 500m of Anglia Square. The development has the ability to act as a catalyst for transformative change within the wider northern city centre area. The timely development of Anglia Square is considered of strategic importance and a factor in determining whether Norwich achieves its full economic potential.
132. Development plan policies have reflected this objective since 2004. The City Of Norwich Replacement Plan first identified the redevelopment opportunity presented by Anglia Square and the scope for investment in this site assisting in the regeneration of the surrounding area. The adopted JCS currently provides the policy context for Anglia

Square until 2026 and provides a framework for future development of the site. The site lies within the city centre and is subject to JCS Policy 11. This policy seeks an enhanced regional role for the city centre, as the main focus for retail, leisure and office development, with housing and educational development reinforcing its vibrancy. It is stated that the redevelopment of brownfield sites will contribute to the economic, social, physical and cultural regeneration of the city centre.

133. JCS 11 identifies the Northern City Centre in particular for comprehensive regeneration, with the objective of achieving physical and social regeneration, facilitating public transport corridor enhancements, and utilising significant redevelopment opportunities. The City Centre key diagram specifically identifies Anglia Square as an 'Area of change' for mixed use development (residential, commercial and retail) with an improved public realm. In addition, JCS policy 19 identifies Anglia Square/Magdalen Street as a Large District Centre (LDC), where new retailing, services, offices and other town centre uses will be encouraged at a scale appropriate to its form and function. The LDC is intended to meet the shopping needs of residents of north Norwich and provide for a mix of activities, however currently the centre lacks a sufficient diversity of stores to meet this role.
134. The Northern City Centre Area Action Plan (NCCAAP) was adopted in March 2010 to guide the regeneration of the northern city centre area. This plan allocated Anglia Square for a comprehensive mixed use development anchored by a new major supermarket. The area action plan was based on extensive public and stakeholder consultation and many of its key principles are reflected in the current policy framework and remain relevant. However, the expiry of the NCCAAP has the effect that there is currently no site specific policy relating to development of Anglia Square.
135. The emerging Greater Norwich Local Plan (GNLP) is being produced by Broadland District Council, Norwich City Council and South Norfolk Council working together with Norfolk County Council through the Greater Norwich Development Partnership (GNDP). The GNLP will provide the planning strategy and identify the sites for growth across the three districts of Broadland, Norwich and South Norfolk until 2036 and once adopted will supersede the JCS. The GNLP is currently at Regulation 18 stage. It is currently anticipated that a draft Reg 18 plan will be published in Autumn 2019 and Re. 19 published in 2020 with adoption in 2021. Through the Call for Sites, a number of sites have been proposed in Norwich City Centre to date for consideration as potential GNLP allocations, including the Anglia Square site. The proposal (submitted in 2016) is for mixed use development to include approx. 20,000 sq.m retail floorspace, 1500 dwellings, 1200 car parking spaces, and community and leisure uses including a cinema.
136. Despite the previous and current permissive planning policy context for Anglia Square, development has not come forward and the site has continued to fall into a state of physical decline. Although major schemes have been proposed by previous owners and granted planning approval in 2008 and 2013, these retail led developments have proved unviable to implement. Substantial changes in the retail market, which coincided with the wider economic recession around that time, culminated in the site changing ownership in 2014, Columbia Threadneedle buying the site from the National Asset Management Agency (body created by Irish Government in response to banking crisis). In response to these changed circumstances and the expiry of the NCCAAP the council has sought to both provide substantial pre-application advice to the new owners and to ensure that there remains an agreed policy framework for the determination of future planning applications on this site.

137. Norwich city council adopted the Anglia Square Planning Guidance Note (PGN) in 2017. The council's aim in producing the PGN is to assist with the delivery of a viable and deliverable form of comprehensive development on the site which is acceptable in policy terms, which delivers the council's long-held aspirations for the site and stimulates the regeneration of the wider northern city centre area. The Anglia Square PGN is a non-statutory guidance document but intended to be a material consideration in planning decision taking.
138. The PGN, which was subject to public consultation, sets out the broad principles of development for the site, identifies constraints, provides specific policy guidance on a range of issues relevant to the proposed form of development which was emerging during pre-application discussions in 2017.
139. The PGN includes a stated future vision for the site along with specific development objectives. These are set out below:
- **Vision** - *A rejuvenated Anglia Square, with a distinctive identity that compliments the neighbouring area and reflects its location in the heart of the historic northern city centre. The development will have, a clear relationship in built form with the surrounding area, and a safe and attractive public environment, including enhanced public spaces. Enhancement of a strong and diverse District Centre function, serving the wider suburban areas of North Norwich, an improved convenience offer, and enhanced leisure offer with a new cinema, cafes and restaurants to continue the use of the area into the evening. A surface link will cross the existing St Crispin's Road improving walking and cycling connections into the core city centre, and there will be an enhanced public transport offer. All this will be supported by new residential development to create additional footfall, natural surveillance and activity that will enhance the vitality and viability of the Large District Centre and help to meet the housing needs of Greater Norwich.*
 - **Development objectives** -
 1. *regenerate its physical environment, including open spaces and public areas, and help to preserve or enhance the historic character of the surrounding area and key views;*
 2. *achieve sustainable, energy efficient and high quality design and create an attractive environment for people living in, working in and visiting the area;*
 3. *reinvigorate the local area's economy, including providing for new employment opportunities;*
 4. *revitalise the retail and service provision of Anglia Square as a key element of the Large District Centre serving the wider area of North Norwich, with commercially attractive retail units based around an appropriate shopping circuit to maximise footfall to all units and thus ensure the long term viability of the retail offer, and acting as a catalyst for the wider economic regeneration of the northern city centre;*
 5. *provide significant levels of residential development in order to make effective use of this sustainable city centre location, thereby assisting in the delivery of new homes to meet Norwich's needs and creating a vibrant, sustainable community which will support the viability of the enhanced retail and leisure provision;*
 6. *provide enhanced tourism, arts and cultural provision including potential for hotel and student accommodation, as well as an enhanced evening economy that will include restaurants, cafes, bars and a cinema;*

7. *provide for improved public transport facilities in the immediate vicinity of the site;*
8. *enhance opportunities for pedestrian and cycle movement through the site suitable for all, including those with disabilities, and linking with the wider area; and*
9. *encourage the development of a balanced community including contributing to the provision of enhanced community facilities and recreational opportunities to meet local needs and complement the existing local community and the diverse mix of uses that already exist within this part of the city centre.*

140. The planning policy context set out above is strongly permissive of the principle of the redevelopment of Anglia Square and accords with the revised NPPF (July 2018), which attaches substantial weight to the re-use of brownfield sites and recognises the multiple benefits of mixed use schemes. The redevelopment of Anglia Square is identified as a strategic development objective in the JCS and this objective, fourteen years after first being identified, remains undelivered. There remains a strong recognition of the potential substantial economic, social and environmental benefits that development of this kind could bring to both the site and to the wider city centre. On this basis there is a strong presumption in favour of approving a development scheme which would deliver such benefits.

Main issue 2 – Development viability

141. Key policies and NPPF paragraphs – JCS4, DM33, NPPF paragraph 50.
142. The regeneration of Anglia Square has been sought by a number of previous owners and by the city council for a considerable period of time. To date the lack of viability and high level of commercial risk, have stopped the private sector from bringing forward consented development schemes. In the absence of any reasonable prospect of public ownership of the site, this cycle of failed regeneration attempts will only be broken by a development scheme which proves sufficiently attractive for the private sector to invest in and build. Given the strategic priority of the regeneration of Anglia Square an understanding of the factors affecting development viability and deliverability of development on this site is important in considering this application.
143. The Anglia Square PGN includes reference to this matter, stating ‘ensuring that the proposed redevelopment of Anglia Square will be viable will be a key consideration affecting the deliverability of what is proposed’. The PGN acknowledged that in 2017 there was evidence that delivering development on this site may be compromised by a number of factors including the scale of planning obligations requirements and the payment of the Community Infrastructure Levy (CIL).
144. In terms of planning obligations, the JSC 4 requirements for affordable housing are an important consideration. The NPPF 2018 considers that the use of viability assessments at decision making stage should not generally be necessary, as proposals for development should accord with the relevant policies in an up-to-date development plan. The planning practice guidance states that “[p]olicy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage” (Ref. ID. 10-002-20180724). Paragraph 57 and practice guidance paragraph 10-007 set out circumstances where a decision stage viability assessment may be appropriate and places the emphasis on the applicant to

demonstrate whether particular circumstances justify the need for a decision stage viability assessment.

145. Policy 4 of the JCS was adopted prior to the publication of the NPPF 2018 and sets a single “target proportion” of affordable housing across the area. The policy advocates adjustments to this requirement where it can be demonstrated that affordable housing requirements along with site characteristics and infrastructure requirements would render the site unviable in prevailing market conditions. The approach taken by policy 4 of the JCS stems from the evidence base for the policy which concluded that a significant proportion of schemes would not be viable at the target level of affordable housing. Therefore decision stage viability assessment is supported by the policy and was advocated during the examination into the plan. JCS policy 4 did not take an approach that “allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision making stage” (planning practice guidance Ref. ID 10-002 20180724) indeed both the Local Plan examination and the resulting policy 4 supported the opposite approach of promoting viability assessment at the decision making stage. It is therefore appropriate for the application to be assessed in light of an application stage viability assessment.
146. In relation to planning obligations and especially JCS4, the landowner and developer were advised by officers early on in discussions that the provision of affordable housing was an absolute requirement of any housing led scheme for this site. This advice was based on the scale of housing being discussed at pre-application stage, the socio – economic objectives for the northern city centre and the core aims of DM1 to ensure development promotes mixed, diverse, inclusive and equitable communities. Without the proposed quantum and mix of affordable the development would not be considered acceptable in planning terms notwithstanding viability constraints. The implication of this is that regardless of DM33 and evidence around development viability, the applicants have been advised that affordable housing requirements would not be adjusted below a meaningful minimum level.
147. In the knowledge of potential financial barriers to delivering development on this site, in September 2017 the city council submitted a bid to the Homes England Housing Infrastructure Fund (HIF) for marginal viability funding. The Housing Infrastructure Fund is a government capital grant programme aimed at delivering up to 100,000 new homes in England to which local authorities have been able to bid on a competitive basis. Marginal Viability Funding is aimed at housing sites that are being held back because the costs of putting in the infrastructure and building the homes are too great. The purpose of the funding is to unblock these sites by allowing grant to be drawn down quickly and for infrastructure and homes to follow at pace. In February 2018, Homes England confirmed that the city council’s bid for £12.26m to fund infrastructure associated with the development of Anglia Square had successfully passed stage 1 of the approval process. The bid was supported by evidence around development costs, including substantial costs in relation to site assembly, demolition, site preparation and remediation which are in excess of £16million. The bid was based on an earlier draft version of the current proposed scheme. Following the submission of the amendments to the scheme and the publication of the viability assessment the HIF bid has been updated and a decision about whether it passes stage 2 of the approval process is awaited from Homes England. Regardless of the outcome of the HIF bid, the development will be required to provide the agreed quantum and mix of affordable housing and no provision is proposed to allow for a possible downward review of

affordable housing. It should be noted that if the bid is not successful this could mean that the Development would not come forward due to a lack of viability.

148. A number of documents submitted with this planning application address or relate to development viability matters, these include:
- Design and Access Statement – in which the commercial development brief is set out (i.e. the amount and mix of development)
 - Chapter 4 of the Environmental Statement (ES) – which includes consideration of alternative forms of development
 - The Viability Report (prepared by Icen Ltd) - which comprises a detailed appraisal of the proposed scheme.
149. The Viability Report includes a description of the physical and operational condition of the existing shopping centre and associated buildings. In addition the report contains a narrative which sets out a range of factors which bear on the future prospects of the shopping centre, investment decisions by the existing owners and the level of financial risk for prospective development partners. This report along with analysis set out in chapter 4 of the ES highlight the following considerations:
- The Anglia Square shopping centre, Sovereign House and Gildengate House have escalating maintenance costs and parts which are no longer able to be beneficially occupied.
 - The unoccupied and underused elements blight the surrounding area and undermine investment confidence in the locality
 - The current commercial space is not well suited to modern occupier requirements and commercial rental income is not sustainable in the long term.
 - Lack of certainty over future income does not justify the capital sums required to regenerate the existing shopping centre in its own right.
 - Sovereign House and the disused multi-storey car park blight the location, reducing investment potential in the existing fabric of the centre and adjoining land.
 - The potential to convert Sovereign House to residential is severely constrained by the high cost of re-purposing the structure and uncertainty over value created.
 - There are very substantial upfront costs associated with demolition, site clearance, ground de-contamination and archaeological investigation
 - The site is large, highly constrained and a development programme would need to be phased over a number of years increasing both risk and uncertainty.
 - Current residential values in this part of the city are low compared to Norwich and East of England averages. This creates uncertainty about future value and increases development risk.
 - The site is an operational shopping centre – redevelopment of the centre incurs costs in terms of phasing, tenant management and lost rental income.

150. These factors have been important determinants of: the site owner's decision to seek a development partner; the number of viable alternative development options; the extent of developer interest; and the scale and mix of development deemed necessary to address commercial risk.
151. The case made by the applicants is that the proposed regeneration scheme presented in this application is viable and capable of proceeding in 2019. They argue that in order to reduce risk and deliver the scale of regeneration benefits sought for this location (including affordable housing), the development needs to be transformative. That is, the existing buildings which have blighted the location for the last decade need to be demolished to allow for comprehensive, efficient re-planning of the whole site and to increase developer confidence in future values. They indicate that the scale of residential development (1209-1250 dwellings) is integral to creating sufficient value to support the delivery of the wider scheme. They set out in the planning documents the socio-economic and environmental benefits that the new homes and mixed use quarter will deliver and how the scheme has sought to meet the requirements of the development plan and the Anglia Square PGN.
152. The application includes a commitment to the on-site provision of affordable housing. The details of the affordable housing proposal are set in para.208-219 of this report. The Viability Report includes an assessment of the affect affordable housing provision has on development viability. Policy compliant affordable housing levels generate a development profit of 1.04% Gross Development Value (GDV). With 120 affordable dwellings the assessment shows an increased profit level of 5.36%GDV. The Viability Report confirms that this does not represent an appropriate competitive developer return for a scheme of this type.
153. The case made in the Viability Report is that if the scheme is to be delivered with 120 affordable dwellings then it would not be viable in the absence of grant funding and CIL relief. The table below illustrates the effect of the Homes England HIF grant and the payment of CIL (£8.8m for the submitted scheme with 120 affordable dwellings, £7.9m for a policy compliant scheme) on development profit. The applicants have indicated that in the event of planning permission being approved it would be their intention to make an application to Norwich city council for Exceptional Circumstances Relief (ECR) regarding the payment of CIL. A decision whether to introduce an ECR policy across Norwich is scheduled to be made by Full Council on 27 November 2018. In the event of this policy being introduced, an application for CIL relief on the first phase of development (block A) could be made to the council following the grant of planning permission. CIL relief could not be sought on the subsequent phases until reserved matters approval has been granted. However, the applicants have indicated that on the basis of the viability evidence they anticipate the need to seek CIL relief for the entire development. The outcome of such applications cannot be determined at this stage.

154.

| | Profit % (GDV) | Profit % (GDV) With HIF grant | Profit % (GDV) With HIF grant and CIL relief |
|---|----------------|----------------------------------|---|
| Policy compliant (262 affordable dwellings) | 1.04% | 8.5% | 12.15% |
| Submitted Scheme (120 affordable dwellings) | 5.36% | 11.94% | 15.62% |

155. With reference to the above table, with elements of infrastructure being funded through HIF grant and the requirement for CIL removed, the scheme generates a return on GDV of 15.62%. The applicants have indicated this level of return is considered to represent a viable arrangement to enable the scheme to progress. It should be noted that if the HIF bid is not successful or if ECR is not granted, this would not absolve the developer from complying with the affordable housing obligations to be secured via the S106 agreement, but it could result in the scheme not coming forward due to lack of viability.

Viability review

156. The Viability Report and the supporting evidence regarding development costs and projected values have been reviewed on behalf of the council by the District Valuer Services (DVS).

157. The DVS has made the following comments :

In relation to cost:

- Build costs, apart from the car park, are all between the lower and median BCIS quartile. For a scheme of this scale, BCIS median costs would be expected adjusted for location. The Building Cost Information Service (BCIS) is a provider of cost and price information for the UK construction industry
- A building contingency has been included which is at the lower end of the accepted range.
- Professional fees have been included which are at the lower end of the accepted range.
- Bench mark land value has been set at £1. It is normal to assess the viability either against a benchmark land value or a target profit level. Within the IcenI report under the development context section IcenI clearly state that the land owner is a joint applicant and is using this land holding flexibly since long term income generation is not achievable from the existing configuration of Anglia Square. We agree with this conclusion and on this basis IcenI are adopting a benchmark land value of £1 and the target profit is the measure of viability.

In relation to value:

- Values for the affordable units are at the lower end of accepted range and quotes from Registered providers should be sought in due course

In relation to profit:

- The DVS consider a reasonable target for a development of this mix and scale to be 18.5% of GDV for the submitted scheme and 18% for the policy compliant scheme. This is based on a blended profit:

Residential – 20% of GDV
Affordable – 6% of GDV
Commercial – 15% of GDV

This figure is 1% lower than the target profit of 19.41% referenced in the Viability Report.

158. The DVS states '*that the Viability review undertaken by Icenis is a robust assessment of the viability taking account of the current stage of the development process*'. The DVS advises that both the policy compliant scheme and submitted scheme (with no public support) are not viable when judged against the blended profit targets. In relation to the submitted scheme, with grant funding and CIL exemption he states that with profit at '16% is approaching a level that could be deemed marginally viable against our target profit level of 18.5%'. The report acknowledges the position of the applicants that with CIL relief the profit level approaches target levels and could be deemed marginally viable. The DVS recommends that in the event of planning permission being approved it would be prudent for the Council to consider a viability review of the scheme if work has not started within an agreed timescale and/or a review at mid-point to establish if the profitability of the scheme has improved.
159. The advice from the DVS allows significant weight to be attached to both the assessments set out in the Viability Report and the conclusions around development viability. The findings illustrate the particular economic challenges presented by large scale brownfield sites when substantial site clearance/preparation is required and when the construction programme is required to be phased over a number of years. In these cases the financial cash flow is front loaded with substantial development costs whilst capital from sales is back loaded towards the end of the project. This significantly increases finance costs and levels of development risk. These challenges will have been faced by previous owners and developers of this site and along with uncertainty about the value of a retail led development, acted to create a level of commercial risk to prevent development proceeding. In the case of this proposal the need to phase a development around an operational shopping centre introduces additional complexity and cost and the inclusion of multiple apartment blocks has a further bearing on cash flow. Taking into account the history of failed regeneration projects and the Viability Report submitted with this application, there is strong evidence to indicate that the comprehensive redevelopment, involving the

provision of affordable housing is likely to rely on some form of public subsidy at least during the early phases.

Consideration of alternatives

160. Chapter 4 of the ES sets out a range of alternative development options for this site. This information is important in two respects. Firstly it is a requirement of Schedule 4 of the EIA Regulations to include a 'description of the reasonable alternatives ...studied by the developer, which are relevant to the proposed project and its specific characteristics, and an indication of the main reasons for selecting the chosen option, including a comparison of the environmental effect'. It will become evident in later sections of this report that this development is judged to have a number of significant environmental effects, in particular impact on the historic environment which Historic England have judged to be severe. Secondly the information is important in reaching a decision on this application and understanding the likely development options for the site in the event of this scheme not proceeding
161. The table below sets out alternatives considered by the applicant and additional options identified following the first round of public consultation on the planning application. The table is based on the information and analysis set out in chapter 4 and its SEI (Supplementary Environmental Information) of the ES and includes a brief description of each option, 'comparison environmental effect' and the applicant's judgement on that option. It should be noted that the applicant has assessed all options as not leading to comparable beneficial environmental improvements to the submitted scheme.

| Option | Environmental effect | Developer/landowners consideration of option |
|--|--|--|
| 1. Do Nothing existing situation | No environmental improvement Prospect of further deterioration in the condition and visual appearance of existing vacant buildings and the wider centre | This option generates an income but requires ongoing capital investment, particularly in respect of the maintenance and repair of existing, dated buildings and structures. |
| 2. Do Minimum investment in the existing shopping centre and surface level car parks | Degree of improvement to the shopping centre and car parks No wider physical improvement given vacant/unused buildings would remain No improvement to open spaces or connectivity for pedestrians and cyclists | Ruled out: Significant investment in the existing shopping centre or in the surface level car park is not commercially viable – costs not justified by a sufficient increase in income |
| 3. Do minimum and demolish as above, plus | As above, plus some improvement to the appearance of Edward Street | Ruled out: As above, but in addition the demolition costs of the MSCP |

| Option | Environmental effect | Developer/landowners consideration of option |
|---|--|---|
| removal of MSCP to podium level | and views from within the shopping square | would not be viable - no commercial benefit derived from the removal of the unused car park |
| <p>4. Do minimum, demolish and convert</p> <p>as above, plus residential conversion of Gildengate House and Sovereign House</p> | <p>As above, plus</p> <p>Sovereign House is identified as a negative building - re-cladding would result in some limited improvement</p> <p>Retention of Sovereign House limits comprehensive redevelopment and the physical improvement of the wider shopping centre</p> | <p>Ruled out:</p> <p>Economically viable on a high level basis – delivery considered to be highly constrained</p> <p>Construction and layout of Sovereign House not conducive to residential conversion. Land value derived from the creation of residential units in Sovereign House (and Gildengate House) is low and is unlikely to provide enough incentive for development. Conversion costs high and condition of fabric unknown. Converting Sovereign House judged as marginally viable</p> |
| <p>5. Columbia Threadneedle pre-application (2015):</p> <p>Refurb. c8400sqm existing retail</p> <p>New retail 2670sqm</p> <p>Retention of cinema</p> <p>New gym</p> <p>Conversion of Pitt buildings to B1</p> <p>C550 new homes through Gildengate and Sovereign House</p> <p>New MSCP</p> | <p>Recladding of Sovereign House would result in some limited improvement</p> <p>New MSCP would remain a visible feature of Edward Street</p> <p>Existing cinema/ block would continue to unattractively enclose Sovereign Way and awkward narrowing of Magdalen Street</p> <p>Retention of Sovereign House limits the provision of additional onsite public realm</p> | <p>Ruled out:</p> <p>Neither viable nor deliverable in this location.</p> <p>See above. Viability and deliverability risks to pursuing a scheme where Sovereign House is retained</p> <p>Retention of Sovereign House limits redesign of the site to transform permeability and quality of public realm</p> |

| Option | Environmental effect | Developer/landowners consideration of option |
|---|----------------------|--|
| <p>6. Cathedral Magdalen & St Augustine's Forum (CMSA)</p> <p>Norwich North City Vision – St Augustine's & Anglia Square Regeneration Community Brief"</p> | | <p>Not considered by the landowner/developer</p> <p>But not considered a viable proposal.</p> <p>Proposal includes health and childcare facilities and accommodation for potential art gallery , concert hall or museum. No evidence that premises are being sought by groups/bodies and that funding exists.</p> <p>Vision relies on comprehensive clearance and redevelopment of the site.</p> <p>Operational needs of the shopping centre and existing tenants are not addressed. Continued function of the principal element of the northern Large District Centre would be uncertain,</p> <p>Proposed scale of residential and commercial development would not provide sufficient value to fund the costs of redevelopment</p> |

162. Options 4 and 5 both include the retention and conversion of Sovereign House to residential. This reduces demolition and disposal costs. However, the assessment points to the considerable development costs of conversion and the awkward configuration of the structure which would limit efficient residential subdivision. The conversion of Sovereign House is judged to be high risk, based on residential values in the northern city centre and predicted high costs of re-purposing the building. It should also be noted that the assessment points to very limited market interest in conversion and Weston Homes having ruled this out as a viable option. The retention of Sovereign House requires the upper deck of the precinct to be retained at least in part, this is highly limiting of the wider remodelling of the site. In terms of comprehensive regeneration, the case is made in the assessment that wholesale demolition is required to remove existing negative buildings, to allow for the effective re-configuration of the commercial

floorspace and to create a distinct new quarter which will support an uplift in site value. In the context of substantial development costs this uplift in value is argued as essential to creating investor confidence and a deliverable scheme.

163. In terms of environmental impact, options 2 - 4 would, to varying degrees, result in some visual improvement of the site and address some existing harm caused by the site/buildings to the character and appearance of this part of the city centre conservation area. However, none of these options facilitate the comprehensive re-development of the site of the scale envisaged by JCS 11. With the exception of 4, 5 and 6 the other options do not deliver additional housing. Furthermore in the case of option 4, all the additional homes created would be market housing – as the change of use of existing buildings to residential would be subject to a Prior Approval procedure and JCS4 requirements for affordable housing would not be applicable.
164. Options 5 and 6 would result in site wide regeneration and therefore unlike 1- 4 meet development plan objectives for the scale of change in this location. However, option 6 is unclear whether the proposed development approach would safeguard the existing function of the shopping centre. Both would achieve a mix of beneficial land uses and a massing of development which would reflect the height of existing buildings on the site and/or the surroundings. These two options provide considerable scope to achieve a form of development which results in environmental improvements to the appearance and function of the site and an enhancement of this part of the city centre conservation area. However, significantly these options along with options 1- 4, are judged by the applicant not to be viable based on the scale of development costs and projected values of the quantum of development. Chapter 4 of the ES concludes 'the submitted scheme is the most appropriate for the site in terms of design, scales and uses delivering physical, economic, social and environmental improvements. Alternatives considered would not be commercially viable for the applicant to fund and deliver'.

Overall summary of viability and deliverability

165. There is compelling evidence that the development prospects of Anglia Square have in the past and will continue to be, influenced by a wide range of environmental, operational and financial factors. The case that these factors in combination is preventing development from coming forward and severely limiting development options for the site is strong. Historic England have stated that the range of alternative development set out in Chapter 4 of the ES (including the CMSA Vision) have not independently been subject to viability assessment and therefore they question whether clear and convincing justification has been provided for the submitted scheme. However, Historic England have not submitted contradictory viability evidence nor do they acknowledge the substantial risks and challenges development of this site presents and which have acted in the past as a disincentive to any private sector investment. Having regard to the information provided by the developer (including the appraisal of other development options) and the advice of the DVS officers consider that the proposal represents the optimum viable scheme for this site.
166. The applicants make the case that for comprehensive development of this site to proceed three conditions will need to be met. Firstly that the site owners need to have the capacity to take on the specific risks involved in bringing a large scale project of this type forward. It is stated that Columbia Threadneedle, as an

institutional long term investor, has this capacity and can use its assets flexibly to facilitate redevelopment. Secondly, that there is a willing developer who has both the capacity and capability to bring forward such a complex development project. It is stated in the Viability Report that 'Weston Homes are a rapidly growing house builder operating throughout the southeast, London and in the East of England that specialises in urban brownfield...Through its track record to date of delivering development of the type proposed at Anglia Square, it has secured the ability to borrow significant capital for development and as an urban brownfield developer is seeking sites on which to deliver development that match its specialist skill set'. Lastly that public sector funding/subsidy will need to be available to support development of these complexity and scale. If the applicants' judgements regarding development options are accepted the likely outcome of all these conditions not being met, will be the long term continuance of the site in its underutilised state. Furthermore the owners have indicated that in the context of the "do nothing" scenario, investment in the depreciating asset would be unviable and unsustainable, considering that no uplift in income is likely to be generated to justify the owner's capital expenditure on escalating maintenance costs.

167. The applicants indicate that condition 1 and 2 are met. Significantly the third condition is not in the applicants' control and can only be met through decisions made by the public sector outside the scope of this planning application. However as referred to para. 147 Homes England's have confirmed that the city council's bid for £12.26m to fund infrastructure associated with the development of Anglia Square has passed stage 1 of the approval process. A decision on stage 2 of the application process is due shortly. A condition of the HIF offer is that the grant would need to be drawn down during the period 2019 -2021 thus requiring development to start next year. Furthermore in the event of planning permission being approved the Norwich ECR policy (if approved by Full Council on 27th November) would enable the developer and owner to submit an application to the Norwich City Council for ECR, although the outcome cannot be pre-determined.
168. On this basis if the local planning authority were minded to approve planning permission for this development there is the prospect of public funding/subsidy being immediately available to enable the regeneration project to proceed and be delivered during the period 2019 - 2026.

Main issue 3 Impact of the development on European designated sites

169. JCS 1 requires all new development to ensure that there will be no adverse impacts on European and Ramsar designated sites. The policy further states development will provide sufficient and appropriate local green infrastructure (GI) to minimise visitor pressures.
170. European Sites in this context means Special Areas of Conservation (SACs - designated for the habitats they contain); Special Protection Areas (SPAs – designated for the species that they support); and Ramsar sites (wetlands of international importance). They are protected in UK law under the Conservation of Habitats and Species Regulations 2017 (the Habitats Regs).
171. The Greater Norwich Joint Core Strategy (JCS) was adopted in March 2011 with amendments adopted in January 2014. The Appropriate Assessment (AA) of the

JCS highlighted the need for consideration of hydrological impacts on Natura 2000 sites¹; and identified the need for green infrastructure (GI) provision to mitigate potential in-combination and cumulative effects associated with recreation impacts on international sites resulting from the JCS growth proposals. The principle being that if attractive GI is available close to new homes, residents will use that for their regular day-to-day recreation rather than visiting Natura 2000 sites.

172. The application site does not fall within the boundary of a designated site nor within a buffer area identified by Natural England within which development is likely to affect designated sites. However, during the EIA screening exercise Natural England advised that the development may potentially impact on designated sites comprising the Broads SAC, Broadland SPA and Broadland Ramsar site as a result of recreational disturbance due to in combination impacts with other housing development. On this basis they advised that this matter should be assessed as a separate section of the Environmental Statement and that the council, as a competent authority would need to consider recreational impacts due to the new housing which have potential, either alone or in combination, to adversely affect any of the European and international sites (SAC, SPA and Ramsar) in the vicinity.
173. Chapter 12 of the ES addresses this matter along with an accompanying technical appendix. Natural England in their response to the first round of consultation on this application indicated that insufficient evidence had been submitted to enable this council to ascertain that the proposal will not result in adverse effects on the integrity (from recreational disturbance) of any of the sites in question, when considered in combination with other new housing proposals. Natural England's response highlighted that designated Natura 2000 sites within the area (e.g. Norfolk coast, Broads and the Brecks) are under increasing recreational and disturbance pressure, referencing research Panter *et al* (2016) Visitor Surveys at European Protected Sites across Norfolk during 2015 and 2016, Footprint Ecology. This report describes the link between new housing development and a rise in access to designated sites, it explains that "*increased recreation places increasing demands on the management of the European sites and can cause impacts to the designated interest features*". Key findings of the report include that for the sites surveyed there would be a predicted increase of 14% in access by Norfolk residents as a result of new housing during the current plan period. For these sites the primary recreational activity was dog walking (41%) and walking (26%). For the designated sites in the Broads impacts identified relate to disturbance caused to breeding /wintering/passage birds, trampling/erosion; eutrophication (where water becomes overly enriched with minerals and nutrients) and contamination.
174. Following Natural England's response the applicant submitted further information relating to predicted levels of dog ownership within the proposed development and further clarification regarding open space and recreational opportunities available to new residents. This included an audit of parks and open spaces within walking distance/short drive from the site as well details of green infrastructure projects identified in the Greater Norwich Infrastructure Plan 2018(GNIP). The GNIP supports the delivery of growth identified in the JCS and identifies a number of

schemes to contribute to the protection and enhancement of the strategic green infrastructure network. The information submitted by the applicant predicts a very low level of dog ownership within the development and indicates that owners wishing to dog walk or just walk, would have access to a wide range of recreational options thereby not relying on visits to European sites. Furthermore they point to Habitat Regulations Assessments of the emerging Greater Norwich Local Plan Issues and Options and the Strategy for Sustainable Tourism which indicate that the more sensitive habitats are not easily accessible and that 'gateway' areas are well managed.

175. On this basis the applicant concludes that owing to the development and its location, it is not considered that there would be any likely significant effects on the integrity of the Broads SAC, Broadland SPA and Broadland Ramsar site, the River Wensum SAC or their component Sites of Special Scientific Interest (SSSIs) when the project is considered alone (i.e. impacts would be de minimis) and that there is no requirement for mitigation or compensation measures associated with the proposed development. In addition, they conclude that such an effect could not then contribute to a significant in-combination effect when considered with other plans. It is stated in para 6.11.13 of the Note of Clarification that significant effects are not likely to arise as a result of the proposed development, even when considered in the context of cumulative residential development that is approved; proposed on allocated sites in the current Development Plan; or potentially to be allocated in the Greater Norwich Plan. They further indicate that the measures set out in the GNIP relating to the provision of green infrastructure are planned and in the process of delivery, and that these measures will mitigate the impact of new development across the Greater Norwich area on the European sites when considered in combination.
176. Natural England's advice is that in combination effects cannot be screened out simply because a project alone has no likely significant effect. This would not accord with the legislation which requires the likely significant effects of a project to be considered alone or in combination with other plans or projects. Natural England (NE) have considered this supplementary material and have advised that without suitable mitigation being secured it is not possible to conclude that the proposal is unlikely to result in significant effects on the European sites in question in combination with other new housing proposals. This is because Natural England contend there will be in combination effects with other allocated housing sites in the Greater Norwich Joint Core Strategy (JCS) (as evidenced in the HRA for the JCS and subsequently reflected in local spatial plan policies). NE acknowledge that the likely effects from the development alone are not likely to be significant but in combination with other new, there is a likely significant effect which could affect Natura 2000 sites in the Broads.
177. On this basis under section 63 of the Habitats Regs the council has undertaken a Habitats Regulation Assessment (HRA) (appendix 3). An HRA is a multi-stage process; the first stage (screening) is to determine whether or not a project is likely, either alone or in combination with other projects, to have a significant effect on a European Site. In this instance on the basis of the advice from NE, the answer is yes, the proposal could have significant in combination effects upon European Sites. The HRA then moves to the 2nd stage, which is the Appropriate Assessment or AA.

178. At AA stage, subject to inclusion of satisfactory mitigation, which may involve both on-site and off-site measures, it may be possible to ascertain that a proposal will not adversely affect the integrity of the designated site. Where there is an adverse effect or it is uncertain, then conditions or planning obligations may be used to enable it to be ascertained that the proposal would not adversely affect the integrity of the site. Permission may then be granted subject to the conditions or obligation identified.
179. In making a judgement on effect, account has been taken of green infrastructure (GI) measures in the GNIP which have been specifically identified to deliver enhanced local recreational opportunities within Norwich. These include schemes to enhance walking routes leading out of the city, in particular Marriott's Way and the Riverside Walk, which provide access to the countryside and the Norfolk Trails network. These schemes will provide suitable and appropriate recreational opportunities for people including dog walkers. Natural England have advised that 'by making a proportionate contribution to the existing off-site GI and local GI initiatives ... would help to reduce the effects of recreational pressures on Natura 2000 sites further afield.'
180. GI initiatives identified in the GNIP are funded through pooled CIL. Therefore within the greater Norwich area, all housing developments make a proportionate contribution to the delivery of these GI projects through the payment CIL. This provides the framework through which the requirements of JCS1 are met. Natural England have indicated that securing a proportionate contribution from this development would enable the council to conclude 'no adverse effect' on Natura 2000 sites, in combination with other JCS allocations.
181. Having had regard to this advice it is considered necessary for such a contribution to be secured in order to satisfy the requirements of the AA. This normally would be through the payment of CIL but in the event of this development being subject to CIL relief, it will be necessary to secure a contribution through a S106 Obligation (see para.565 of the report).

Main issue 4 Principle of housing

182. Key policies and NPPF paragraphs JCS 4, 9, 11 DM12, DM13, NPPF section 2 and 5
183. The proposal is a high density residential-led urban regeneration scheme. The hybrid scheme illustrates a total of 1209 dwellings although the description of development sets 1250 as an upper limit. This range of dwelling number allows the potential for a possible adjustment in the proposed ratio of 1:2 bedroom units as the development proceeds. Phasing plans submitted in support of the application indicate that the development would be delivered in four phases commencing in 2019 with completion expected in 2027.

| Phase | Total number of dwellings | Number of affordable dwellings in each phase |
|--------------|---------------------------|--|
| 1 2019-2023 | 323 | 0 |
| 2 2021 -2025 | 474 | 95 |
| 3 2023 -2027 | 319 | 0 |
| 4 2025- 2027 | 93 | 25 |
| Total | 1209 | 120 |

184. A core objective of the NPPF is to significantly boost the supply of housing. The NPPF emphasises the importance of delivering a wide choice of high quality homes and creating sustainable, inclusive and mixed communities. The NPPF further states that as much use as possible should be made of brownfield sites, para 117c indicating that planning decisions should give substantial weight to the value of using suitable brownfield land for homes and other identified needs.
185. The local policy context for housing provision is provided by JCS 4, whilst DM12 sets out the policy principles that apply to all residential developments, including the need to contribute to a diverse mix of uses in the locality, to have regard to the housing delivery targets in the JCS, and to provide for a mix of dwellings in terms of size, type and tenure. In terms of affordable housing tenures the JCS seeks 85% social rented housing and 15% intermediate tenures. This tenure breakdown is broadly supported by evidence in the 2017 SHMA which establishes need for 84% affordable rent and 16% intermediate tenures.
186. JCS policy 4 reflects evidence on housing needs and seeks that between 2008 and 2026, 33,000 net additional homes (1,833 per year) will be provided within the Norwich Policy Area (NPA - this area comprises all of the City Council area plus parts of Broadland District and South Norfolk District Councils) of which at least 8,500 were to be provided in the City Council's administrative area. Since adoption of the JCS, due to market conditions, delivery of new housing has been running at levels below that necessary to achieve the levels set in the JCS both within the City Council area and across the wider NPA.
187. JCS 11 identifies the city centre as suitable for high density housing which will support the vibrancy and role of Norwich as a regional centre. The policy specifically identifies Anglia Square as an 'area of change' where new housing is expected to form part of a future development mix. Previous policies in the NCCAAP set appropriate targets for the delivery of housing across the whole northern city centre area; policy LU3 set a minimum of 900 dwellings for the plan area as a whole of which a minimum of 250 were to be provided within a redeveloped Anglia Square. These targets reflected overall housing needs at the time and also the fact that the previous planning consents were retail-led, whilst acknowledging the benefits that residential development would bring to the mix.
188. The Anglia Square PGN includes a housing objective, stating that the redevelopment of the Anglia Square should provide *for 'significant levels of residential development that makes effective use of this sustainable city centre location, thereby assisting in the delivery of new homes to meet Norwich's needs and creating a vibrant, sustainable community which will support the viability of the enhanced retail and leisure provision'*. The PGN does not prescribe a dwelling number acknowledging that residential capacity would need to be determined

having regard to site constraints, mix of accommodation and uses and viability considerations.

189. The site represents a substantial brownfield housing windfall site. The NPPF indicates that as much use as possible should be made of previously development land and planning decisions should give substantial weight to the value of using suitable brownfield land for housing as well as supporting appropriate opportunities to remediate despoiled, degraded, derelict or contaminated land.
190. On the basis of this policy context there is no policy constraint on proposals for Anglia Square bringing forward significantly more housing than previously envisaged in the NCCAAP or previously consented schemes.
191. The proposed quantum of housing in the current planning application would make a significant contribution to Norwich's housing supply overall. Norwich's annualised housing requirement based on the adopted Joint Core Strategy is 477 units per annum over the period 2008-26, and on that basis the proposed development would deliver 2.6 years of Norwich's housing supply, spread over an 8 year construction period.
192. It is also relevant to note the current position on housing land supply as stated in the latest Annual Monitoring Report 2016-17 (AMR) produced by the Greater Norwich authorities. The land supply in the Norwich Policy Area (NPA) at April 2017 was 92.2% of the required figure, or 4.61 years' worth of sites, representing a shortfall of 1187 dwellings.
193. The AMR states that, so long as a five year supply cannot be demonstrated in the NPA, Norwich City Council will need to take a view on how to address the requirements of the NPPF when considering planning applications. It also notes that housing land supply has been measured against the more recently published figures in the Central Norfolk SHMA. Using this revised approach suggests that land supply is in a better position across the NPA, with a 6.82 year supply after allowance has been made for the City Deal. However, the AMR concludes that, "whilst this recent evidence around housing need is a material planning consideration that can be taken into account when determining planning applications, it is considered, in the light of government advice, that the SHMA (which is largely untested) cannot be taken as the starting point in considering land supply at present. The weight attached to the new SHMA will increase as the GNLP is produced but for the time being all it may do is to potentially reduce the weight afforded to the shortfall in housing land supply when making planning decisions."
194. The position on the five year land supply needs updating following publication of the revised NPPF in summer 2018. The policies in the NPPF will have a significant effect on the assessment of housing land supply in the future. At the time of writing the precise impact of these changes cannot be fully predicted but may result in a significantly improved position. A further consideration is that from 10th January 2019, the JCS will be over 5 years old and the new Local Housing Need (LHN) will replace the JCS housing target as the basis on which 5 year land supply is calculated. Early indications are that the LHN for Greater Norwich will be below the JCS target and that its application will lead to a significant reduction in the homes needed to account for unmet need at the beginning of the 5 year assessment period. A recent consultation on the standard method for assessing

local housing need (Ministry of Housing, Communities and Local Government (MHCLG): Technical consultation on updates to national planning policy and guidance - 26 October - 7 December 2018) however introduces further uncertainty on this matter.

195. In summary, at the time of writing and in the context of the methodology for calculating five year supply be expected to change, the Greater Norwich authorities cannot demonstrate a five year housing land supply against the JCS housing targets.
196. In terms of the NPPF a lack of 5 year housing land supply can have a significant bearing on the consideration of planning applications because paragraph 11(specifically 11d), of the NPPF could give rise to a presumption in favour of sustainable development if the relevant tests are met. Where there is no 5 year housing land supply the NPPF states the housing supply policies are deemed to be out of date and that planning permission should be granted unless:
- the application of policies in the NPPF that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.
197. However, it has been reported in para.177 that this development has required an appropriate assessment. In these circumstances the NPPF states in para 177 that the presumption in favour of sustainable development does not apply. The MHCLG consultation referred to in para. 194 of this report, included proposed changes to para. 177 (NPPF) which would have the effect of re-engaging the presumption in favour of sustainable development where no adverse effect from the plan or project on the integrity of the habitats site has been found. Some weight can be attached to this consultation and the intent of the change however, at the time of the writing this report para 177 of the NPPF remains a significant material consideration. However, in this regard it should be noted that the NPPF cannot require the policies of the development plan to be disregarded by the decision maker, rather it may influence the weight that is attached to them.
198. Officer advice is in relation to this particular case that the presumption in favour of sustainable development should not be applied and all policies in the current development plan should be considered to remain up to date for purposes of Paragraph 11 of the NPPF. In this context Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise, and this remains the starting point for the decision on this application. The weight to be given to development plan policies alongside other material considerations will need to be assessed by members. Officers consider that the extent to which the proposed scheme will contribute to meeting Norwich's housing needs is a material consideration of significant weight, as is the fact that the Council is not able to demonstrate a 5 year housing land supply (albeit this does not trigger a presumption in favour of development).

Detailed housing proposals

199. DM12 in the Development Management Policies Plan sets out the policy principles that apply to all residential developments. DM12 is permissive of residential development subject to a number of exceptions none of which apply to this site. The policy includes a number of criteria that should be met by new development these are considered in the following paragraphs.
- a) *Proposals for development should not compromise the delivery of wider regeneration proposals and should be consistent with the overall spatial planning objectives for sustainable development set out in the JCS and policy DM1*
200. The application proposed a scale and mix of development to regenerate Anglia Square. The regeneration scheme is residential – led, it is proposed that a new residential community will form an essential part of a new mixed use quarter. As referenced in Main issue 2 the quantum of residential proposed is the level the applicant indicates is necessary for the whole regeneration scheme to be viable. In terms of criteria a) of DM12, the case that is made is that the proposed level of housing is essential to deliver the regeneration of the site and the wider northern city centre.
- b) *Proposals should have no detrimental impacts upon the character and amenity of the surrounding area (including open space and designated and locally identified natural environmental and heritage assets) which cannot be resolved by the imposition of condition*
201. These matters are considered in detail in other sections of the report.
- c) *Proposals should contribute to achieving a diverse mix of uses within the locality, taking account of individual site proposals in the Site allocations plan, other relevant development plan documents*
202. The proposed development includes a wide mix of uses including a public car park, a hotel, flexible commercial, leisure and hospitality uses. These are considered in detail in other sections of the report.
- d) *Proposals should provide for a mix of dwellings, in terms of size, type and tenure including (where the size and configuration of the site makes this practicable and feasible) a proportion of family housing and flats to meet the needs of the community. The mix will be based on the findings of the Housing Needs Assessment or subsequent assessments*
203. With the exception of nine houses on the northern Edward Street site, the scheme is entirely flatted - the 1200 total being split between 637 x 1 bed and 563 x 2 bed flats. Given the scale of proposed housing this represents a narrow mix of both dwelling size and type. Objections to this application have raised concerns that the mix of dwelling type is too narrow and that this concentration of flats will neither promote a mixed and balanced community nor meet the needs or result in cohesion with the existing community.
204. The 2017 SHMAA examines property size and tenure issues in Norwich. This indicates that of the predicted need for market housing arising from the city council area (15,294 dwellings), approximately 36% is predicted to be for 1 and 2

bedroom properties (5511 dwellings). The proposed number of market dwellings (1089-1139) has the scope to meet approximately 20% of need for this size of dwelling in a single location. On the basis of this evidence there is a substantial future need for dwellings of the size proposed and the quantum potentially deliverable on this site would make a sizeable contribution to meeting this need.

205. In terms of dwelling type, the 1 and 2 bed units consist of flats and a small number of duplexes. This is likely to limit the number and size of families who could be satisfactorily accommodated on the site. DM12 acknowledges that the size and configuration of certain sites can influence the practicality and feasibility of including family houses. In the case of this site there are also additional considerations. Firstly DM18 and DM12 both seek to safeguard the large district centre function of Anglia Square and the commercial ground floor use of new development. Secondly the site is centrally located with the surrounding roads carrying city centre traffic levels. These factors limit the practicality and suitability of the site for a form of development which includes a significant quantum of ground floor residential uses. The focus on a flatted form of development, first floor level upwards, allows for the quantum of commercial development at ground floor level to be optimised and for active multi-functional streets and public squares to be created. The resulting mix of uses provides the scope for wide benefits to be delivered, including significant economic benefits associated with supporting the retail and leisure sector and the creation of substantial new employment opportunities. The disadvantages of a narrow range of housing type therefore have to be balanced against the benefits of promoting a mixed use district centre scheme.
206. Although the proportion of family houses may be low the development is nevertheless likely to support a range of household type. The new residential quarter is likely to be attractive to young couples, singles and sharers and downsizers.
207. The socio-economic chapter of the ES includes an assessment of the characteristics of this part of the city in terms of demography and housing. The census data for the locality (local impact area – see appendix 4) indicates a high proportion of young adults live in this part of the city and an average household size lower than the Norwich average (1.8 persons per household in comparison to 2.1). On this basis, in terms of age profile and household size the proposed development may share some similar characteristics with existing resident households in this part of the city

e) *Tenure Mix (including Affordable housing)*

208. It is likely that the development will include both privately owned and rented dwellings. Furthermore the site development will include social rented and intermediate properties.
209. JCS 4 requires all major housing development to include a proportion of affordable housing of an appropriate tenure mix. At the time the JCS was adopted the target proportion for housing scheme of this scale was set at 33% with approximately 85% social rent and 15% intermediate tenures. However, the policy allows for this figure to be adjusted to reflect the impact delivering affordable housing can have upon development viability. In addition, the figure also needs to be amended to reflect national planning guidance as described below.

210. Current national planning policy guidance provides an incentive for the developers of brownfield sites containing vacant buildings through a mechanism referred to as the 'Vacant Building Credit'. Where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building, the guidance indicates that local planning authority should offer a financial credit to the developer equivalent to the existing gross floorspace of relevant vacant buildings when any affordable housing contribution is calculated. The Norwich Affordable Housing Supplementary Planning Document (SPD) sets out the vacant building calculation.
211. The proposal includes the demolition of substantial vacant buildings and applying the credit in accordance with the SPD has the effect of reducing the target affordable level to 23% of the total number of dwellings. Furthermore consideration also has to be given to the potential for Gildengate House to be converted to residential under Part O of the General Permitted Development Order. The Prior Approval process for such changes of use does not allow local authorities to apply housing policy requirements to these conversions. Applying the reduced percentage to the current total of dwellings proposed (minus those in Gildengate House) the affordable dwellings target for this development is 262 units without any adjustment for viability.
212. The application proposes a minimum of 120 affordable dwellings. The submitted application documents include an Affordable Housing Statement setting out the affordable housing proposal in terms of dwelling size, type, location and tenure. The proposed level of affordable housing is 142 dwellings below the target policy level and a Viability Report has been submitted setting out the financial justification for the reduced number proposed. The issue of development viability is considered in detail in Main issue 2 of this report. However, the case made in the Viability Assessment is that development is not commercially viable with affordable housing provision and the 120 dwellings proposed are only achievable with the specified level of public subsidy via HIF and ECR.
213. The Affordable Housing Statement states that the units will comprise 111x 1 bedroom flats and 9x 3 bed family houses, 85% social rent and 15% intermediate tenure. The Strategic Housing Officer has confirmed that there are currently 2438 applicants on the Choice-based Lettings (Home Options) register requiring a social rent one bedroom property. Of these 647 are single people or couples registered in the NR3 postcode area. She has confirmed that there is currently an overwhelming need for 1 bedroom properties and as such the proposed social rented flats would make a significant contribution to addressing this specific need in this part of the city.
214. The Strategic Housing Officer has further confirmed that based on the projected future residential values provided by the developer, Affordable Home Ownership, Shared Ownership and Shared Equity products would not meet the housing need in this part of the city. This is material consideration in relation to para 64 of the revised NPPF which states planning decisions for major development involving the provision of housing is proposed should expect at least 10% of the homes to be available for affordable home ownership. The expectation is that these homes would form part of the overall affordable housing contribution for the site. Applying this requirement to the overall affordable housing contribution for this development:

- 10% dwellings for affordable home ownership = 120
 - Target affordable dwellings for the development = 262
 - Tenure split - social rent: intermediate = 54.2% : 45.8% (142 dwellings:120 dwellings)
215. The NPPF indicates that this minimum number of affordable homes should be sought unless this would exceed the level of affordable housing required in the area, or significantly prejudice the ability to meet the identified affordable housing needs of specific groups. In this case the number of proposed affordable dwellings is well below the target level and the SHMA indicates that within Norwich most need is for affordable rented dwellings. On the basis of this evidence, in the case of this application it is justified to seek affordable units of the type and tenure in shortest supply and maintain the 85% social rent requirement.
216. The strategic housing officer has further advised that they do not support any of the 120 dwellings being for affordable home ownership. Having regard to property value in this part of the city, 1 bed flats are available and likely to remain available, below the projected value of an 'affordable' 1 bed flat on this development. The strategic housing officer therefore recommends that the developer provides the 15% intermediate tenure via either an Affordable Rent Tenancy model, which equates to up to 80% of market value rents, or some other version of Intermediate Rent.
217. The Viability Report has assessed the scheme with 18 of the affordable flats valued 40% below open market value (allowing for shared ownership tenure). At this stage it is not known whether this value is capable of being achieved for affordable rent units. However, given the value assumptions made for the 120 affordable units in total, it is considered that there is a strong likelihood that the scheme will remain viable with an 85:15 split between social and affordable rent. In the event of the application being approved, it is recommended that the S106 Obligation should require this mix but in the event of registered provider offers falling below the target value, should allow for shared ownership of the intermediate units.
218. In terms of DM12 the proposal provides for a viable tenure mix. Affordable rented dwellings are shown distributed across the development in four locations (block D, B and two locations in E). The financial justification for the level of affordable housing provision is discussed in Main issue 2 but notwithstanding the shortfall in provision against policy requirements, the strategic housing officer has confirmed that the proposed affordable dwellings in terms of number, type and tenure will make a significant contribution to meet housing need in this part of the city. Given the scale of need the strategic housing Officer has recommended phased delivery of the homes, including a proportion in the first phase. In addition a Local Lettings policy is recommended to ensure that residents in housing need within the local impact area of the development will have the opportunity to benefit from the new homes.
219. In relation to phased delivery, the submitted phasing plan indicates affordable dwellings being provided in phase 2 (95 dwellings) and in phase 4 (25 dwellings). The applicants have indicated that on viability/cash flow grounds that it is not possible for affordable dwellings to be accommodated within block A, the first

phase of the development. However, they have agreed that block D, which comprises 41 social rented flats, could be delivered early in phase 2. This is a matter capable of being secured through a S106 Obligation. Para 566 of the report sets out a range of matters which would be secured through a legal agreement in the event of planning permission being agreed. These matters include the detailed requirements in relation to the delivery of affordable housing, including the number, size, tenure and location of the dwellings along with the timing of provision. In relation to block D the applicants have agreed the transfer of affordable units in this block prior to the occupation 200 dwellings in block A (total of 323 dwellings in this block). This would ensure that social housing is available at the time the first phase of development is being occupied.

f) Proposals should achieve a density in keeping with the existing character and function of the area, taking account of the significance of heritage assets where relevant and the proximity to local services, and/or public transport routes.

220. The proposed residential density of this development is approximately 296 dwellings per hectare. This density is high and would exceed that of any other residential scheme elsewhere within the city.
221. The NPPF advocates that developments make optimal use of sites and that where appropriate seek a significant uplift in the average densities for residential development. Sustainable locations ie city centres and areas well served by public transport, are recognised as providing the optimal potential for achieving higher densities. However, the NPPF, DM12 and DM3 recognise that where density is excessive this can have significant and harmful implications for historic assets, for the character and function of an area and for the quality of the development as a place to live.
222. The proposed scale of residential development seeks to make the very best use of a city centre location and to establish a substantial new community in a location where residents will enjoy easy sustainable access to employment and a broad range of services and facilities. Given the location, function and accessibility of this site there is a strong case for optimising residential density to at least that typical of other city centre sites. The applicants have sought to demonstrate that the form and density of development proposed is justified on all grounds but have also advised that the number of dwellings proposed is necessary to make development viable and therefore deliverable. The implications of the number of dwellings/density on the design, heritage impact and amenity levels is assessed in the other sections of the report and in the concluding section of the report.
- f) For all proposals involving the construction of 10 or more dwellings, at least 10% of those dwellings will be built to Lifetime Homes standard (or equivalent).*
223. The Design and Access Statement confirms that at least 10% of the dwellings will be built to meet 2015 Building Regulations M4(2) for accessible and adaptable dwellings (replaces the Lifetime Homes standard). Like Lifetime Homes, regulation M4(2) requires dwellings to be accessible, to meet differing needs, including for some elderly or disabled people, and to allow adaptation of the dwelling to meet the changing needs of the occupants over time. The provision of a minimum of 120 homes meeting this standard will support a mixed and inclusive community.

Main issue 5 Proposed retail and other town centre uses

224. Key policies and NPPF paragraphs: JCS 11, JCS19, DM18, DM20, DM21 and NPPF para 85-90
225. The site lies within and forms an integral part of the Anglia Square, Magdalen Street and St Augustine's Street Large District Centre. JCS 19 identifies Anglia Square as one of two Large District Centres within the city centre (the other being Riverside). These centres are second tier shopping areas within the JCS defined retail hierarchy, one level below Norwich City Centre's defined primary and secondary retail areas. Large District Centres are intended to serve a wider than local function, the principal catchment area for Anglia Square being defined as including the Norwich's northern suburbs and extending out as far as the outer ring road.
226. The adopted Norwich Local Plan (2014) carries forward the Large District Centre designation, identifying it on the Policies Map. Policy DM20 in the DMPP manages change in primary and secondary retail areas and large district centres. The DMPP policy is supplemented by Main town centre uses and retail frontages SPD (December 2014). The SPD sets out a number of requirements for planning applications, that seek to maintain and support the viability of the Large District Centre which include: seeking to maintain a minimum of 60% of defined retail frontage in retail use; and supporting the further expansion of hospitality uses supporting the evening economy complementary to main town centre uses, and community uses.
227. JCS 11 and the Northern City Centre Area Action plan (NCCAAP) identified Anglia Square as a location for retail growth, specifically for convenience goods. NCCAAP Policy AS2, now expired, imposed a requirement for a new food store of 3600sqm and planning applications approved in 2013 included substantial new retail space in this location. These developments have not come forward and there has been evidence for some time that food store developments of the previously planned scale are no longer being pursued by supermarket operators. However, the objective of improving the function of this Large District Centre remains. The Anglia Square PGN (2017) states that currently *Anglia Square 'lacks the diversity of uses required to fulfil its role as the focus of the Large District Centre and has limited capacity to serve the day to day convenience shopping needs of the local community. There is significant scope to improve the quality and mix of the existing retail offer to not only better suit local needs, but to create a new destination retail and leisure location for the City'*.
228. A health check of the centre carried out as part of the Greater Norwich Employment, Town Centre and Retail Study (GVA 2018) indicates *'the 1970s purpose built shopping centre is aesthetically unpleasing and performs a retail function which is little more than functional, but positively does benefit from some reasonably-sized units. The 'anchor' stores to the centre are relatively poor, although reflective of the offer of this part of the centre as a focus for discount/value retailing'*. The GVA study, carried out to inform the strategic direction of retail policies in the emerging Greater Norwich Local Plan, makes a number of recommendations in relation to the Anglia Square, Magdalen Street and St Augustine's Street Large District Centre:

- City council should seek to progress the redevelopment of Anglia Square Large District Centre.
- Redevelopment should continue to incorporate retail floorspace at ground floor level, in order to ensure that local residents' day to day shopping needs can be met. This should include units of a mixture of floorplate sizes, including larger units to enable current national retailers such as Iceland, Poundland and Poundstretcher to continue to have a trading presence in the centre, alongside smaller units for more specialist operators.
- Although the Retail Study has identified no quantitative need for additional convenience goods retail floorspace to serve the Norwich urban area, there is an opportunity for qualitative improvements to the convenience goods retail offer in Anglia Square/Magdalen Street district centre, owing to the current limited facilities for local resident.
- Provision of a cinema should be retained if possible
- A comprehensive programme of public realm improvements to Anglia Square/Magdalen Street district centre should be progressed.

229. The application proposes the phased demolition and redevelopment of a substantial proportion of the existing shopping centre. Floorspace currently used for a variety of uses within the A1 retail use class and sui generis uses (nail bar / bookmakers/car sales) would be demolished and replaced with new commercial floorspace for flexible use across classes A1-A4/B1/D2 and sui generis uses (book makers/nail bars). An analysis of the change in floor space is set out in the table below. Overall a net reduction of floorspace for these uses is proposed (13,570sqmGEA – 11,000sqm GEA).

| Use class | Existing sq.m GIA* | Proposed sq.m |
|---------------------------------|--|---|
| A1 | 8981 | |
| A3 | 106 | |
| Other (incl. Sui Generis uses) | 3836 | |
| Total GIA | 12,923 (13,570 GEA) | 9780 (11,000 GEA) ** |
| B1 | 16,161 | Up to 6580sqm GEA |
| D1 | 780 | Flexibility within 11,000 plus D1 chapel 1,300sqm GEA |
| D2 (incl. cinema and nightclub) | 2577 - total includes existing cinema 1731 | New cinema 3400 GEA |
| C1 (hotel) | - | 11,350 (GEA) |

* Proposed for demolition (or in case of Gildengate House converted to residential)

** flexible floorspace A1-A4/B1/D1/Sui Generis

230. Retail, leisure and office uses are defined by the NPPF as main town centre uses. Developments involving these uses (with the exception of offices) are subject to Policy DM18 and Policy DM20. Policy DM18 is supportive of main town centre uses within Large District Centres where their scale is appropriate to the centre's position in the hierarchy set out in JCS19 and does not exceed the indicative floor spaces set out in appendix 4 of the DM plan. Appendix 4 sets no specific

thresholds for maximum floorspace for individual units within Large District Centres.

231. In policy terms, given the Large District Centre designation, the re-provision of floorspace (including large format units) for main town centre uses is acceptable and positively supported. Indeed the significant permanent loss of retail floorspace in this location would undermine the ability of the centre to serve a district centre function and would be resisted on policy grounds. In this case it is proposed to replace existing retail units developed in the 1960/70s (which have no planning restrictions in terms of use or sub/division/amalgamation) with new commercial units more suitable in format to current retailer needs. The willingness of the shopping centre owner to invest in renewing the centre is welcomed and provides the opportunity for not only enhancing the shopping environment and retail offer but for the comprehensive redevelopment of the wider site. However, from a policy perspective there remains a requirement to consider whether the redevelopment will enhance the Large District Centre function of Anglia Square in a manner which is consistent with the position within the JCS retail hierarchy. Given the overall reduction in the amount of floorspace this is not an issue of quantity of floorspace, but rather the quality character and function of that floorspace. Key issues are whether the day to day shopping function of the centre will be retained/ strengthened and whether the centre will continue to have a complementary role to the city centre shopping area.
232. The application is supported by a Retail Strategy Report in which the applicants describe how they consider the proposal will 'complement Norwich City Centre and help to enhance the function of the Large District Centre'. It is stated in the strategy that the 'intention is to create a unique retail and leisure offer for this part of Norwich City Centre which, reflecting the role and function of Anglia Square as the principal element of the northern Large District Centre, serves the needs of its immediate catchment and existing and new residents'. The approach is underpinned by replacing the existing shopping centre with new modern units which can be used flexibly by a wider range of retail and leisure tenants and by creating an improved pedestrian environment /shopping destination. Improving both the qualitative retail offer and extending the leisure appeal of the centre into the evening (by the provision of a new cinema supported by A3 and A4 uses) are aimed at supporting the long term viability and vitality of the centre. The proposed layout of development will result in the re-configuration and renewal of the existing Anglia Square public square and the creation of an additional new public square to the west. The strategy document sets out an approach in which the renewed square will be a focus for shopping, anchored by a food store between 500-1500sqm. It is proposed the new square will function as a leisure square, where food and drink uses will cluster around a replacement cinema. A range of retail uses are referred to including convenience stores for day to day shopping purposes, along with comparison and lifestyle retail. The range of uses sought also allows provision for D1 community uses (.e.g. health centre, crèche). In addition the amended scheme now seeks flexibility for a proportion of the floorspace to be used as multi-let serviced or flexible offices (see para x-y).
233. The application is seeking flexibility for the new replacement floorspace to be sub-divided according to tenant requirements and used across A1-A4/B1/D2 use classes according to tenant/ market demand. The NPPF in paragraph 85, indicates that retail policies should promote the long-term vitality and viability of centres by allowing them to grow and diversify in a way that can respond to rapid

changes in the retail and leisure industries. In addition a number of representations to the application have questioned that in the context of existing pressures on town centres and both high street and independent retailers, whether it is viable to redevelop the scale of commercial floorspace proposed. On both grounds an approach which allows for a wide range of uses, enables the centre owner to respond more easily and rapidly to changes in market demand and maintain viable occupancy of the floorspace. However, allowing this flexibility provides no control over the quantum of A1 uses nor the type of retail. This creates uncertainty over whether the mix of uses will meet residents' day to day shopping needs and/or whether the function of the shopping may shift in a way which competes directly with the primary and secondary shopping areas of the city centre.

234. Objections have been raised to the application citing concerns over the retail component of the scheme. A number of representations have raised concerns that the development will result in the potential displacement of existing independent and discount/value led retailers from the centre which currently serve the needs of the local community and give the Anglia Square its distinctive character. The representations point to the proposed layout/appearance of the new commercial floorspace and future higher rents, as evidence that high street chains will be drawn in and the local function of the centre lost. In addition objections to the planning application have been received from the owners of Chapelfield Shopping Centre (intu) and also Castle Mall. Both representations focus on the potential of the new development to function in a manner which would directly compete with these established higher order shopping centres. Norwich BID have indicated general support for the redevelopment of the site, stating that it needs investment and regeneration but have commented that the amount of retail proposed is a large retail footprint for a secondary retail area in the context of new evidence about demand.
235. These concerns are important material considerations both in the context of considering the socio-economic impact of the development and in retail policy terms which attach significant weight to protecting the function of city centres. The Retail Strategy Report (Revision A) seeks to address objections made to the proposals on retail grounds. The applicants have indicated agreement to a number of planning controls regarding the use of the commercial floorspace at the centre. These controls are all capable of being secured via the imposition of planning conditions or through a S106 Obligation in the event of planning permission being approved. They include:

| Ref. | Planning restriction |
|------|---|
| C1 | The proposed ground floor flexible commercial floorspace on the application site shall not exceed not exceed 11,000sqm GEA. |
| C2 | <ul style="list-style-type: none"> <li data-bbox="443 1760 1294 1827">• The agreement and implementation of an Anglia Square Management Plan – <li data-bbox="443 1865 1385 1933">• Scope of the plan: mitigating the impact of the development on existing businesses /tenants. <p data-bbox="539 1973 1442 2007" style="text-align: right;">The management plan would include arrangements for the pre-</p> |

| Ref. | Planning restriction |
|------|---|
| | <p>development /construction period. These arrangements should include: the centre owners using best endeavours to support existing tenants and where practicable continued occupancy of buildings throughout the duration of the project; and reasonable support for those businesses seeking relocation within the city.</p> <p>Plan also to include support for businesses remaining in the centre and in the locality - by ensuring good access, signage, proactive marketing/events etc., sharing of information with MATA .</p> |
| C3 | Phase 1 of the development shall include provision of a single food store unit at least 800sqm GIA. No more than 20% non-convenience floorspace within the food store |
| C4 | The proposed total 9780 sqm GIA of flexible floorspace would include a minimum of 1500sqm (GIA) of A3/A4 uses. These uses (min of 75%) shall be centred around the new 'leisure' square (as identified on plan ref. Retail Strategy – Ground floor plan) and not exceed a total 3500sqm (GIA) |
| C5 | Phase 3 of the development shall include a replacement cinema |
| C6 | The floorspace identified on plan ref Retail Strategy – Ground floor plan shall include a minimum of 5 units less than 150sqm GIA and 5 units less than 250 sqm GIA |
| C7 | 1150sqm GEA of this new floorspace total (11,000sqm GIA) would be provided and made available at discounted commercial terms to SMEs (small or medium sized enterprise, including social enterprises, charities, not for profit organisations and artists' studios or start-up businesses). Existing tenants to be given first refusal. |
| C8 | PD restrictions changes of use :Part 3: Class A – Restaurants, cafes or takeaways to retail (limit in leisure square);Class M – Retail and specified sui generis uses to dwellinghouses; Class O – Offices to dwellinghouses |
| C9 | PD restriction for the creation of mezzanines |

236. Restrictions 2, 6 and 7 all seek to mitigate the impact of the development on existing tenants of the centre and to ensure that accommodation of a suitable size continues to be available to smaller scale retailers and businesses on suitable terms. This will support existing and future SME and the local/independent sector.
237. Restrictions 1 and 9 seek to restrict the total amount of commercial floorspace within the shopping centre to a level appropriate for a Large District Centre.

238. Restrictions 3, 4 and 5 allow for flexibility in the use of floorspace but ensure there is a qualitative improvement to the convenience goods retail offer (GVA 2018 recommendation) and that non- A1/A2 uses are focused outside of the main shopping square. It should be noted that the likely location of the foodstore within block A will be to the east of the public car park entrance where there is direct access to the service yard accessed from Edward Street. This along with C8 should support a continued retail core to the centre. The replacement of the cinema and provision of a minimum amount of A3/ A4 uses seeks to ensure that the new floorspace is marketed in a manner which supports mixed use /leisure function of the new centre.
239. The representation submitted on behalf of 'intu' suggests that additional planning controls are necessary to ensure that the function of district centre remains focussed on shopping and supporting the convenience needs of the local catchment. The representation suggests the following conditions are justified:
- Within the proposed ground floor flexible commercial floorspace a minimum gross external area of 3,000 sqm shall remain solely for sales of convenience retail goods. This includes a minimum gross internal area of 500sqm within a single 'foodstore' unit
 - A minimum gross external area of 70% of the proposed ground floor flexible commercial space shall only be used for retail use as defined in Class A1
 - Dual Representation – ensuring the development compliments and not competes with the City Centre
- None of the approved retail floorspace should be occupied by any retailer who at the date of such occupation, or within a period of 6 months immediately prior to such occupation, occupies retail floorspace in the Primary Shopping Area of Norwich City Centre; unless a scheme which commits the retailer to retaining their presence as a retailer within the City Centre, for a minimum period of 5 years
240. The suggested minimum area of 3000sqm of floorspace for the sale of convenience goods exceeds the existing amount of floor space currently in use for that purpose and scheduled for demolition. This condition would limit the owners ability to retain existing tenants and conflict with the GVA recommendations for the centre of improving the qualitative, rather than quantitative, convenience offer. The condition proposing a minimum amount of A1 floorspace would limit the amount of floorspace available for café and restaurant uses, B1a office uses and D1 uses. Such uses are considered beneficial to a mixed use function of the district centre. The A3 and A4 uses will support the day time and evening vibrancy of the centre and commercial interest in the new development by hotel and cinema operators and are in line with the recommendations of the GVA study. Demand for B1a floorspace is also identified in the GVA study and discussed in more detail in para 248-256 of the report.
241. The dual representation condition seeks to restrict the ability of a city centre retailer to establish a second store within Anglia Square unless certain commitments are made. Intu have provided national examples where such a condition has been imposed and it is pertinent to note that both relate to out of centre shopping locations. In contrast, Anglia Square is one of two Large District

Centres within the city centre both of which include national retailers as tenants and where dual representation exists and neither of which has the condition suggested.

242. In this case, Anglia Square forms part of a designated Large District Centre where there are no restrictions in place regarding the A1 use of the floorspace. DM18 specifically considers the proposed scale of retail development and in this case an overall reduction in floorspace is proposed. Both the NPPF and the adopted development policies recognise the need for planning decisions to support the role of town- centres and this is increasingly important in the context of a changing retail market and the challenges faced by high street retailers. The GVA 2018 report recommends that GNDP authorities should ensure that the core retail functions of Norwich city centre and network of other policy-defined centres are protected and where possible enhanced. The report further recommends that Norwich City Council should continue to support and facilitate growth of comparison goods retail, commercial leisure and other 'main town centre uses' on appropriate sites in Norwich city centre to support and enhance its role as a centre of regional-scale shopping and leisure significance. Both Riverside and Anglia Square fall within the city centre and national retailers trade from both locations. The restrictions listed in the table in para. 235 will have the effect of limiting the quantum of floorspace for the sale of comparison goods to 6330sqm GIA. This scale of floorspace is below existing provision and of a scale which would not compete with the primary /secondary shopping areas even if national retailers were to be represented at a higher level than currently. The imposition of such a condition is therefore not considered justified or reasonable.
243. The proposed range of retail uses set out in the Retail Strategy Report, in association with complementary leisure and other main town centre uses, including a new cinema and hotel, will help to build investor confidence and reinforce the role of the Large District Centre, complementing the offer of Norwich city centre, and serving the needs of the new residential population whilst continuing to serve the needs of local residents and those in the wider catchment. Subject to the restrictions set out in para x the proposal accords with policies JCS 11, 19, DM18, DM20 and the NPPF

Leisure

244. Key policies and NPPF paragraphs: JCS 8, 11, JCS19, DM18, DM20, DM21 and NPPF para 85-90
245. The application proposes a replacement cinema and hotel (approx. 200bed) along with co-located food and drink establishments. The uses in combination seek to expand the leisure/hospitality function of the Large District Centre extending use of the centre into the evening. JCS12 recognises the valuable role that leisure and hospitality uses play in supporting the vitality and viability of Norwich city centre and DM18 and DM23 are permissive of such uses within designated centres and/or the city centre leisure area.
246. The application proposes to replace the existing cinema (1731sqm), which is proposed for demolition in phase 1, with an expanded facility (3400sqm) in phase 3. The Anglia Square PGN is supportive of the principle of a new cinema in a central location within the site to form a focal point for an extended evening economy. A representation submitted on behalf of Castle Mall has raised

concerns over the size of the replacement cinema and expanded food and drink offer. They consider the scale of this element of the scheme inconsistent with a Large District Centre function. However, it should be noted that there has been a cinema in this part of the city since 1938. The old Odeon, in Botolph Street, had a capacity of 2000 and was the largest cinema in Norwich and East Anglia at that time. The proposed new cinema will remain one of four cinemas within Norwich. The largest cinema is located at Riverside, a designated Large District Centre. The leisure function of the city centre's two Large District Centres is therefore established and the Odeon at Riverside would remain the largest cinema in Norwich. A stated objective of the Anglia Square PGN is that new development should enhance the evening economy of the centre and that this would include restaurants, cafes, bars and a cinema. The inclusion of food and drink uses within the flexible range of uses is therefore considered acceptable and compliant with DM18 and DM20. In addition it is accepted that in terms of successfully extending the function of the centre into the evening, a critical mass of leisure uses is likely to be necessary and as such the scale of A3 and A4 uses sought (1500-3500sqm GIA) is considered acceptable in policy terms. Notwithstanding this, it will be important to ensure that the new uses surrounding the cinema are compatible with both the mixed use function of the location and the scale of residential development proposed. The location is not within the late night activity zone and therefore in accordance with DM23, hours of use should facilitate evening rather than late night opening.

247. The NPPF identifies hotels as main town centre uses. Under policy JCS 8 and JCS 11 new development which promotes the role of Norwich as a cultural centre and visitor destination is supported. DM18 directs hotel uses towards city centre locations and as such the principle of this element of the scheme is acceptable. The scale of hotel proposed will make a substantial contribution to the supply of accommodation available within the city centre, raise the profile of the northern part of the city and generate additional expenditure benefiting businesses within the wider Larger District Centre.
248. The cinema and hotel proposals comply with relevant development plan policies and will lead to both a qualitative and quantitative leisure and hospitality offer of the city centre.

Office development

249. Key policies and NPPF paragraphs: JCS 5, 11, 19, DM19 and NPPF sections 6 and 7.
250. The application proposes the demolition or conversion to residential of 16,161sqm of floorspace previously used for offices. This presents a substantial loss in the quantum of office floorspace within the city centre.
251. The Northern City Centre Area Action Plan (NCCAP) previously supported office development as a component of mixed use regeneration in this area, but did not prioritise it. This approach reflected JCS 11 which identifies Anglia Square as an area of change for retail, commercial and residential development. Policy DM19 of the Norwich Local Plan implements the strategic priorities of the Joint Core Strategy (Policies 9 and 11) in identifying land to deliver a net increase of at least 100,000 sq.m of new office floorspace in the city centre and to secure provision of high quality office premises. It seeks to protect high quality office space and

encourage the upgrading of poor quality and smaller offices, as well as identifying and Office Development Priority Area for office development.

252. The NCCAAP envisaged the demolition of Sovereign House as part of the comprehensive development of the site and the previous planning consents also included its loss. The building has been vacant since the late 1990s and is now considered to be unsuitable for conversion or retention for office use. Its demolition as part of a comprehensive redevelopment of the site is supported.
253. The Anglia Square PGN states that an element of employment development is appropriate on this site and complementary to a mixed development. The PGN therefore supports replacement office accommodation but acknowledges provision should have regard to market forecasts and that re-provision is very unlikely to replace that of the current vacant offer in terms of the amount of floorspace.
254. The Employment, Town Centre and Retail Study (ETCRS)(GVA 2018) provides up to date evidence on employment, town centre and retail needs, along with strategic conclusions and recommendations for the Greater Norwich Local Plan. The Study has been subject to public consultation and no representations were made on the report. The ETCRS therefore represents the most up to date evidence for the Norwich urban area and city centre. It is a material consideration in the assessment of this planning application.
255. The 2018 ETCRS highlights key trends in employment activity including re-urbanisation of business activity back to locations that can offer a broader range of services to employees and the rise in new start-ups in the creative and media sector. There is evidence that these trends are fuelling demand for good quality multi-let serviced or flexible office space in specific locations that allow greater interactions, including Norwich city centre. In terms of meeting future demand the study refers to a number of suitable locations including those that are easily accessible from the inner ring road and reference is made to Anglia Square/Magdalen Street.
256. In response to this new evidence the amended application seeks flexibility for offices to be accommodated within the scheme, by including B1a within the mix of uses proposed for the 11,000 sqm of commercial floorspace. It should be noted that the applicant has indicated this flexibility is not being sought for floorspace proposed within Anglia Square (proposed shopping square) and therefore an upper level quantum of 6580sqm is specified. However, subject to market demand they consider floorspace within the proposed leisure/life style quarter, as well as the edges of the scheme fronting Edward Street, New Botolph Street and Pitt Street (blocks E/F and G) would be suitable for use as multi-let serviced or flexible office space.
257. The council's economic development manager has supported this element of the scheme indicating that this proposal comes at a time when many of the city's SME and scale-up businesses are reporting difficulties in securing suitable business accommodation to meet their growth requirements. This element of the proposal is in accordance with JCS5, 11 and DM 19 of the development plan

Main issue 6 Socio – economic considerations

258. Key policies and NPPF paragraphs: JCS 7,11 DM1and NPPF para 7-10
259. As referred to in Main issue 1 a key objective of JCS 11 is to achieve the physical and social regeneration of Anglia Square and the wider northern city centre. The Anglia Square PGN describes the northern city centre area as one of the most ethnically and culturally diverse parts of the city, with distinctive local shopping and leisure facilities and a vibrant local community, and is a growing location for artists and small start-up businesses. It is important that development of this site recognises these qualities. However, this part of the city also faces a number of challenges. The local impact area, studied as part of the application, is amongst the 10% most deprived neighbourhoods in England in terms of income deprivation which particularly impacts on children and older people. In addition the Health Impact Assessment submitted with the application highlights that the percentage of people in this part of the city with limiting long term illness and mental health issues is also high or very high compared to other parts of Norwich and the rest of England. The dated and tired condition of Anglia Square and the derelict state of significant buildings on the site, creates a very poor built environment and for some, a negative image of this part of the city. Figures from the Norfolk Constabulary indicate high crime rates. All these factors strengthen the case for development in this part of the city which will deliver meaningful physical, social and economic benefits
260. JCS 7 requires all development to maintain or enhance the quality of life and the well-being of communities, promote equality and diversity, and protect and strengthen community cohesion. DM1 recognises this as a principle of sustainable development along with enhancing and extending opportunities for employment and education, protecting the natural and built environment and combating climate change.
261. The Environmental Statement (ES) submitted with the planning application includes an assessment of the socio-economic impact of the proposed development. The assessment looks at impact relative to a baseline position in terms of the demographic and economic profile of the local population, supply of housing, provision of education, healthcare facilities and community facilities including open space and sport and recreation across the area surrounding the site. The assessment examines the potential effects of the development over the construction and operational phases.
262. The table below is an edited version of table 11.6 within the ES which sets out an assessment of the impact of development (prior to mitigation). The 'Impact area' varies with the topic area. Most significant socio-economic effects will predominantly be felt close to the site (local area – see appendix 4), particularly those in relation to education provision, healthcare, open space, sport and recreation and community facilities. However, certain effects, particularly those relating to housing and the economy can be felt more widely.

| Topic | Receptor | Impact area | Duration of impact | Impact | Magnitude |
|---|---|--------------|------------------------|------------|-------------------|
| Construction Employment (jobs created) Direct:250-300 Indirect:400-480 | Local labour market (construction phase) | Wider | Medium-term, temporary | Beneficial | Moderate |
| Existing Uses/ Employment/ Existing Businesses | Local labour market (existing employment/ businesses) | Local | Short-term, temporary | Adverse | Minor |
| Operational Employment Direct: 536-763 Uplift on existing: 286-563 (net) Indirect:60-118 | Local labour market (operational phase) | Local | Long-term permanent | Beneficial | Moderate |
| | | Wider | Long-term permanent | Beneficial | Minor |
| Population Approx. + 2638 | Existing population | Local/ wider | Long-term, permanent | Negligible | ~ |
| Resident expenditure £23.3-40.7m | Local economy | Local | Long-term permanent | Beneficial | Moderate |
| Deprivation | Levels of deprivation | Local/wider | Long-term permanent | Beneficial | Moderate-major |
| Housing 1209-1250 dwellings | Housing targets/ housing need | Local | Long-term, permanent | Beneficial | Moderate to major |
| | | Wider | Long-term, permanent | Beneficial | Moderate |
| Crime | Residents safety | Local | Long-term, permanent | Beneficial | Moderate |
| Education early years, primary/secondary | Pupil and school capacity | Local | Long-term permanent | Negligible | |
| Healthcare | Capacity of local services | Local | Long-term permanent | Adverse | Minor |
| Community facilities | Provision of community facilities | Local/wider | Long-term permanent | Beneficial | Minor |
| Open-space, sport and recreation | Provision of open-space and facilities | Local | Long-term permanent | Beneficial | Minor |

263. It is predicted that there will be direct local benefits associated with job creation, new housing and improved community facilities and open space. Significantly it is predicted that these benefits have the potential to have a moderate – major beneficial impact on levels of deprivation within a part of the city. Wider / city wide benefits are predicted in employment creation and in the improved provision of housing. These matters are considered in detail below.
264. **Construction employment.** The proposed represents a £271million development project. The project is of strategic scale and the largest development scheme proposed in the city centre in the last two decades. The development will support on-going, sustainable construction employment over four development phases spanning an eight-year period. It is estimated that this will average between 250-300 workers per day onsite and lead to 8% increase in the number of construction jobs in the city. It is predicted that these direct jobs will in turn generate further jobs indirectly in the supply chain; adding in the induced jobs (supported by the additional spending of these workers in shops, leisure etc. in the local economy) this is predicted to generate an uplift of around 400-480 jobs during the eight-year construction period. The council's Economic Development Manager has indicated strong support for this level of employment generation in Norwich and indicated that the proposed scale of developer investment will boost the city's profile and its attractiveness to other inward investors.
265. A core aim of the planning system is bringing forward development which builds a strong economy and promoting growth which generates a wide range of jobs. The proposed constructions will positively support the council's objectives (JCS 5 and DM1) of enhancing employment opportunities and supporting the construction and business sectors.
266. In the event of development going ahead the applicants have indicated agreement to a Local Employment and Skills Strategy. This will commit the developer and sub- contractors to optimising use of the local labour supply chain and procurement and to providing training. The eight year construction phase offers significant opportunities for local businesses and opportunities for local people to gain employment and training which will have a lasting positive legacy for future job prospects.
267. This level of employment creation along with the direct and indirect economic benefits of the development for the city is of strategic significance and capable of being given considerable weight in the planning balance.
268. **Existing Uses/ Employment/ Existing Businesses.** There are a number of existing businesses located on/or close to the site which would be directly or indirectly affected by the development and construction programme. A number of existing tenants/ businesses/enterprises are currently located in buildings which are proposed to be demolished and therefore will be displaced during the various construction phases. Others are located close to the site and may be disrupted by the demolition and construction works. The ES assesses the impact of the development on these groups as short term/temporary but adverse.
269. The owners of the site have indicated the following:
- (a) Artist studios in Gildengate House - The residential conversion of this building is currently scheduled to take place in phase 4 (2025-2027). It is envisaged

that Gildengate House will remain available for temporary use as artist studios, up to the commencement of these works, subject to agreement of lease terms between Columbia Threadneedle and Outpost. Accordingly, the applicants indicate that there is scope for the artists to remain whilst the initial phases of development come forward, ensuring a sufficient period for them to find alternative accommodation.

- (b) In respect of the shopping centre, the applicant has confirmed that all existing tenants will be given the opportunity to agree commercial terms for retail accommodation. Columbia Threadneedle has indicated that they will seek to retain as many as possible of the existing tenants within the scheme. (Landlord and tenant discussions have been taking place with a view to re-accommodating Poundland, Shoe Zone and Boots within the new scheme subject to planning permission).
- (c) The 'Under the Flyover' proposal, whilst comprising a separate current planning application from the Anglia Square planning application, subject to planning permission, will provide flexible and affordable opportunities for small scale businesses.
270. In the event of planning permission being approved the applicant has indicated agreement to an Anglia Square Management Plan. This has been referred to in para. 235 of the report and is intended as a means of mitigating the impact of the development on existing businesses /tenants. The management plan would include arrangements for the pre-development /construction period. These arrangements will include: the centre owners using best endeavours to support existing tenants and where practicable continued occupancy of buildings throughout the duration of the project; and reasonable support for those businesses seeking relocation within the city. Furthermore the plan would also include a commitment to support businesses remaining in the centre and in the locality - by ensuring good access, signage, proactive marketing/events etc, and sharing of information with Magdalen Area Traders Association (amongst other things).
271. In addition the developer, in the amended scheme, has identified a quantum of floorspace within blocks A, D, E and F in locations fronting Pitt Street and Edward Street as discounted commercial floorspace. It is proposed that this floorspace would be made available to SMEs – small/medium sized enterprise (including social enterprises, charities, not for profit organisations and artists' studios) or start-up businesses - with priority and first refusal to incumbent local SMEs within the application site. It is recommended that this floorspace in terms of its location, fit out and lease arrangements is secured through a S106 obligation.
272. **Operational Employment** (job created following completion of the development project). The precise number of job created within the new district centre will depend on the end-users that occupy the scheme. However, long term benefits to the local economy are predicted through the creation of additional jobs generated by the new and improved retail, leisure and business facilities being built. The site currently supports approximately 200-250 jobs within the existing uses. The new development, including a hotel, retail, cafes, restaurants and bars, offices, leisure and community uses, provides scope an increase in both the number and range

of jobs opportunities. It is predicted that between 536 - 763 full-time and part-time jobs could be supported by the development an uplift of between 286 – 563 jobs.

273. This will make a sizeable, positive impact to long term local employment opportunities for residents living nearby and within Norwich as a whole. The increased vitality of the centre and increase in footfall has scope to generate a further 60-118 jobs in the shops, services and other businesses within the local area and wider district centre. This impact is quantified as long term, permanent and beneficial at both the local and city wide levels. The council's Economic Development Manager has indicated strong support for this level of permanent employment growth in Norwich. A core aim of the planning system is bringing forward development which builds a strong economy and growth which generates a wide range of jobs. The proposed jobs created within the redeveloped centre will positively support the council's objectives (JCS 5 and DM1) of enhancing employment opportunities and supporting the business, retail, leisure and hospitality sector.
274. **Resident Expenditure** - It is estimated that the households of the 1,250 new residential units within the development could generate total gross spend of between £23.2-40.7 million each year. This will include expenditure on convenience (food and drink), comparison goods (clothing and footwear and household goods), services (hair dressers etc) as well as recreation and cultural activities. A significant proportion of this spending is likely to be retained in the Anglia Square, Magdalen Street and St Augustines Street Large District Centre and within Norwich city centre. On this basis it is predicted that this expenditure has the scope to have a long term moderate beneficial impact on the local economy. It should be noted that that Magdalen Street Area and Anglia Square Traders (MATA) have highlighted the importance of Anglia Square in drawing people to the area.
275. **Housing** - The ES quantifies the impact of the addition of up to 1250 dwellings to the current housing stock as permanent, moderate beneficial across the Wider Impact Area and a permanent, moderate to major beneficial across the Local Impact Area.
276. The Strategic Housing Market Assessment (SHMA) demonstrates an ongoing need for new housing and the 1 and 2 bed dwellings proposed would make a substantial contribution to meeting the need for smaller dwellings over the next 8 year period. The development would enhance the quality and quantity of housing choice within the local market of Norwich and the 120 affordable dwellings would boost the supply of social rented accommodation in a part of the city where there is significant identified need.
277. The proposed scale of development will create a new residential quarter within the northern city centre. In order to support the growth of this new community and cohesion with the existing resident population the applicants have indicated agreement to the agreement and implementation of a Sustainable Community Strategy in relation to the development. This strategy would include measures to:
- (a) *'to ensure that Anglia Square will be a great place to live, work, play, and visit, for the new and the existing surrounding communities, throughout the construction phase and following the redevelopment of the site;*

(b) To achieve (a), by assisting the formation of permanent links between the new and existing surrounding communities, so that they may work together to meet their needs, realise their potential and prosper, achieving quality of life and strength of community now and in the future. The Strategy would be informed by the demographic and socio-economic profile of Anglia Square and the surrounding neighbourhoods within which it is located as described in the Environmental Statement. It would seek to develop the strengths and positive features that can contribute to social sustainability and overcome any barriers.'

278. A draft strategy has been prepared by the applicant and includes measures grouped under the following headings: Economic Growth and Enterprise, Environmental Excellence, Culture and Creativity; Safe and Strong Communities and Health and Wellbeing. In the event of planning permission being approved the agreement of a detailed strategy would form a S106 Obligation requirement. Examples of measures referred to the draft include: promotion of programme of community events including cultural events; commitment to facilitating the use of public spaces by community groups and charities; residential management arrangements to establishment of residents association, residents' newsletters and meetings which would be open to representatives from other community groups to attend. Policy DM1 requires development to promote inclusive and equitable communities by increasing opportunities for social interaction and community cohesion. The Sustainable Communities Strategy provides an appropriate framework for supporting the achievement of these development objectives.
279. **Deprivation** - The location of the site displays a relatively high level of deprivation in comparison to the surrounding area; it is located in one of the 10% most deprived neighbourhoods in the country. JCS Spatial Objective 4 recognises the role of regeneration in reducing deprivation. It states 'development and growth will be used to bring benefits to local people, especially in deprived communities.'
280. Government statistics on deprivation combine data on income, employment, education and skills, health and disability, crime, barriers to housing and living environment. Income and employment make up 45% of the measure. A positive change in the condition of any of these factors can reduce deprivation levels. Furthermore there is a strong link between places (the built environment) and social and economic inequalities. People's health outcomes, education, employment prospects and well-being are significantly influenced both by people's socio-economic status and where they live.
281. The proposed development has the scope to improve access to local employment and housing, including to social rented housing. In addition the development will remove severely degraded/neglected buildings and replace them with new buildings, improved facilities and publically accessible squares and spaces. The ES quantifies the impact of the development on deprivation levels as permanent, moderate to major beneficial across the Local and Wider Impact Areas.
282. On this basis the development positively supports the policy objectives of the JCS and DM1 in terms of bringing benefits to local people in deprived communities.
283. **Crime** - Crime data provided by Norfolk Constabulary indicates that Anglia Square and Magdalen Street present as two of 3 hotspots for the area. Recorded

incidents include shop lifting, drug and violence against person offences. Intelligence relating to drug possession and supply has doubled in 2017-2018.

284. Studies have shown a correlation between deprivation and crime levels such that a reduction in deprivation levels can lead to a corresponding reduction in crime levels. Furthermore the scheme has been designed to create wide routes through the site and improved multifunctional public spaces. The design approach to the streets and public spaces promotes natural surveillance and with appropriate lighting in the evening will create a sense of safety at all times. An increase in footfall will also act as a disincentive for crime.
285. The Norfolk Constabulary have recommended the adoption of 'Secured by Design' standards and specifications across the development and ongoing liaison with the developers through the detailed design process. The developers have confirmed they look to achieve 'SBD, Homes 2016 design guidance' with the associated award schemes and alongside the building regulations requirements endeavour to provide the best possible and compliant scheme. They indicate a commitment to working together with the Norfolk Constabulary and other stakeholders to ensure the best possible outcome for the scheme.
286. **Education.** Norfolk County Council indicate that a development of this form and scale will generate additional demand for school spaces at all levels. The following additional demand is predicted

| Educational level | Children generated by the development (1209-1250 dwellings) |
|--------------------------|--|
| Early years | 28 |
| Primary | 76 |
| Secondary | 50 |
| Sixth form | 5 |

287. Having regard to other consented development in this part of Norwich, Norfolk County Council advise that although there is spare capacity at high school level, there is currently insufficient capacity within the early education sector and at Magdalen Gates Primary School to accommodate the children generated by these developments. However, they additionally advise that a new Free School (St Clements Hill Primary Academy) opened in September 2018 and will grow to become a 420 place primary school and that a purpose-built nursery on the Sewell Park High school campus site is currently being developed. It is anticipated that this new provision will provide sufficient capacity to accommodate the additional demand for early years and primary school places arising from this development.
288. The ES quantifies the impact of the development on education provision in the Local Impact Area is assessed to be permanent and negligible.
289. **Health care** – The ES contains an assessment of existing GP provision within the locality of the site. The development is expected to generate a resident population of 2,638. Existing GP provision within the Local Impact Area of the site currently operates at a GP to patient ratio of 1: 1,881. The new resident population is likely to increase the average patient list of the five GPs within the Local Impact Area of the Site accepting new patients to up to 47,776, resulting in a GP to patient ratio of 1:1,990 (equivalent to 109 new patients, or a c.6% increase, for each practicing GP). This exceeds the standard level of provision of 1,800 patients per GP.

290. The local GP partnerships and NHS England have been consulted on this planning application. The Castle Partnership, which currently operates from the Gurney Surgery on Magdalen Street, has confirmed that the surgery will be relocating to new premises at 40 Fishergate in 2019. Funding for the new premises has been confirmed. The partnership indicates that the refurbished premises will have sufficient capacity to accommodate additional patient registrations associated with the Anglia Square development. NHS Norwich CCG and NHS England are both involved in the Castle Partnership scheme.
291. NHS England in a consultation response have advised they consider health provision should form part of the CIL Reg. 123 list and that they are currently pursuing this through the Greater Norwich Growth Board forum. They have advised they do not object to this application provided they are able to seek funding via CIL to contribute to the refurbishment and fitting out of new premises for the Gurney Surgery. However, the relocation of Gurney Surgery is a funded project for 2018/2019 and will proceed irrespective of the decision on this planning application. The relocation will provide capacity for additional registrations and therefore the development will not require additional health provision to be funded. In these circumstances a financial contribution would not be necessary or reasonable.
292. In terms of dental care provision, the ES indicates that existing number of patients per practitioner is not known as list sizes are not freely available, however a rise in the local population (2,638 persons) will increase the average patient numbers for each of the eight dental practitioners by 330 per dentist. Applying the typical provision rate of 2,000 patients per dental practitioner to the arising population indicates an increase in demand for c.1 dental practitioner to meet additional demand.
293. Nevertheless, the ES indicates given that two larger dental practices within the Local Impact Area are currently accepting new patients indicating that there is some capacity for this demand to be met, furthermore, some of the new residents may already be registered to nearby practices.
294. Taking account of the current level of provision and the relative increase in demand, the effect of the additional population supported by the development on healthcare provision in the Local Impact Area is assessed as permanent, minor.
295. **Open-space, Sport and Recreation** - The additional population of 2,638 generated by the development will place demand on open space, sports and recreation facilities. There are a number of open spaces available within close proximity to the site - Gildencroft, Wensum, Waterloo and Sewell parks are all located within 1mile (17min walk) . Additional there are two children's play areas located nearby on St Leonard Street and Willis Street. The landscape and open space proposals for this scheme are considered in detail in Main issue 8.
296. The scheme does not include the provision of public greenspace. Communal residential gardens are provided within each of the blocks and squares are proposed as public realm areas. The communal garden space collectively amounts to 10560sqm (26% of the main site area). This space is multifunctional, including space and features suitable for children's play and will assist in meeting the additional demand created by the new residents for openspace. Anglia Square –at 1,400sqm and St George's Square at 2,000sqm are proposed as public

spaces and includes opportunities for seating, play and art and events. The quality of public space currently on the site is very poor and the proposals will result in quantitative and qualitative improvements. On this basis the impact of the development is assessed as permanent, minor, beneficial across the Local Impact Area.

297. **Community facilities** - The estimated increase in population of 2,638 people will give rise to some additional demand for existing community facilities such as libraries, places of worship and community halls.
298. There are facilities for local community use within close proximity to the site including community halls, arts centres, children's centres, community centres, youth clubs, training centres and community gardens. There are a number of places of worship close to the site including the Surrey Chapel which is directly affected by the development. The nearest library to the site is the Norwich Millennium Library. The development makes provision for the replacement of Surrey Chapel with a larger facility (1300sqm compared to 780sqm existing)
299. In addition, Anglia Square is currently an important focal point for the local community providing a location for community interaction. The proposed public squares provide the opportunity for this function to be extended and strengthened. The Sustainable Communities Strategy referred to in para.277 will include measures to support the development of the new resident community and the establishment of strong links with the existing local community. This strategy will include a programme of community events and activities making use of public spaces on the site and in the vicinity (under the flyover).
300. In terms of addressing the increased demand for library services associated with housing growth - CIL is available to Norfolk County Council to fund improved provision. Norwich Millennium library is a significant city wide asset, the funding of which is very unlikely to be impacted in the event of this development not contributing CIL.
301. Overall the development is predicted to have a permanent, minor beneficial effect in terms of community facilities.

Main issue 7 Design and heritage

302. Key policies and NPPF paragraphs – JCS2, DM1, DM3, DM 9 NPPF sections 12 and 16.
303. Para 124 of the NPPF states the *'creation of high quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities.'*
304. Both JCS 2 and DM3 state that all development will be required to be designed to the highest possible standards, creating a strong sense of place. DM3 sets out the design principles against which development proposals will be assessed. Adopted development plan policies along with the NPPF establish a strong basis for schemes which are poorly designed and which fail to take the opportunities for improving the character and quality of an area to be refused planning permission.

305. The Anglia Square PGN includes within the vision, that a rejuvenated Anglia Square will have a 'distinctive identity that compliments the neighbouring area and reflects its location in the heart of the historic northern city centre' and that the development will have a 'clear relationship in built form with the surrounding area'. In para 7.86 and 7.87 it is stated that the site provides an opportunity for significant enhancement to the character of the conservation area and that any future application will need to address how the proposals can successfully integrate and improve upon the existing townscape character.
306. On major schemes the NPPF recommends early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes as being important for clarifying expectations and reconciling local and commercial interests. It is stated that applicants should work closely with those affected by their proposals to evolve designs that take account of the views of the community. On significant projects such as large scale housing and mixed use development, para 129 emphasises the importance of design review and assessment frameworks such as Building for Life.
307. With reference to the preceding paragraph and in accordance with the councils pre-applications procedures, discussions between the local planning authority, Weston Homes and the landowner commenced early in 2016. The applicants describe in the submitted Statement of Community Involvement two rounds of public consultation events and feedback exercises conducted in 2016 and 2017. In addition in accordance with JCS2 and the NPPF the local planning authority have recognised the importance of independent design advice in relation to this major housing-led mixed use scheme. Design South East, a panel providing independent expert design advice within this region, has reviewed the scheme at three stages 1) design concept 2) Prior to submission - layout, form and massing 3) application stage – architectural quality of the tower.
308. The proposed design of the development has attracted substantial interest and criticism from the public, from statutory consultees and non-statutory bodies. The comments are extensive, at times emotive and relate to a wide range of design considerations. In general the comment relates to:
- Quality of place, massing, height, character, local distinctiveness and architectural quality
 - Impact of the design approach: on the local townscape, the historic environment, the qualities of Norwich as a cathedral city, on the lives of the existing community and those of future residents living within the development
309. Some comments have been highly supportive of the scale and boldness of the development proposals, positively welcoming substantial modern architecture into the heart of the city. However, a substantial number of representations are highly critical, raising fundamental objections to the overall design of the scheme including the inclusion of a 20 storey tower. Many strongly argue that the development completely fails to respond to the strong identity and 'sense of place' of Norwich and that if approved will have a lasting damaging legacy. The Norwich Society, Norwich Cathedral, The Council for British Archaeology, SAVE Britain's Heritage and Historic England object in the strongest of terms.

310. In terms of the proposed design approach it is the height and massing of the buildings and the resulting density which define the nature of the scheme and set it apart from other developments in the city. The proposed tower would constitute the second tallest building in the city after the Anglican Cathedral.
311. The overall height and massing of the scheme act to create a form and character of development which in the context of Norwich is strikingly different and unfamiliar. The applicant has invested heavily in a design process which seeks to deliver a new vibrant mixed use quarter north of the river ('over the water') providing the opportunity for transformative change. The Design and Access Statement details the design process which has been followed. This has included: a study of the history and heritage of Norwich; site and area appraisal and evidence of how this analysis has influenced the scheme. However, it is also evident that the commercial development brief, which prescribes a quantum and mix of development for the site, has had a determining influence on the overall height and massing of the scheme. The re-provision of retail floorspace and a 600 space public car park, the 1250 dwelling target and the level of private residential parking provision have been significant factors in dictating the 'block' design approach and establishing a benchmark height of the development. The Design and Access Statement and Heritage Assessment describe how an analysis of heritage assets and critical views has determined the modulation in height of each of the blocks. However, in this case development viability has acted as a constraint which has severely limited changes being made to the height and massing of development which might otherwise result in a scheme with a clearer more sympathetic relationship with the surrounding area.
312. This tension between the design and the quantum of development was highlighted by Design South East when they reviewed an earlier pre-application version of the scheme (April 2017). They commented

The existing Anglia Square Shopping Centre, and the immediately surrounding land and buildings, are in need of regeneration and there is the potential for development on this site to positively benefit the City of Norwich. However, the Panel are concerned that this proposal constitutes over development. We fear it will not be possible to sensitively resolve a scheme at this level of density in this location, and a clear demonstration of the viability evaluations driving the brief is required. Issues relating to this include the way that proposed buildings will relate to the City's surrounding historic fabric, the extent of overshadowing of public spaces, and the proliferation of single aspect flats. We are particularly concerned that the proposed parking provision has increased by 400 spaces since the last design review, over and above levels recommended by local planning officers.

The aim to connect to surrounding routes and to continue and restore the permeability of the City Centre is applauded, and this aspect of the project has improved since the previous proposal. There is a limit, however, to how much can be achieved under such a challenging brief and the inevitable scale and nature of development that results, despite the efforts of the designers involved. There is a serious danger this scheme will create a series of dark, uninviting streets and spaces that will not feel like, nor be used as an integrated and integral part of the City. The quality of accommodation provided is also a concern, with such limited access to daylight and natural ventilation. A major benefit to the wider community would be the renovation of the existing Anglia Square Shopping Centre and surrounding buildings to the south and east; however, this is currently only shown

as illustrative within the masterplan, making it unclear how committed the developers are to the realisation of this (final) phase of development.

313. Following this review the developers made a number of revisions to the proposed scheme. These included (but not confined to): the extension of the scheme to include buildings to the east (e.g. existing cinema block); remodelling of the development focusing height towards the middle of the site rather than at the edges, internal rearrangement of accommodation including a reduction in the number of single aspect units; and the introduction of a more active frontage on to Pitt Street. This revised scheme formed the March 2018 planning submission which has been further changed the amendments submitted in September 2018.
314. In terms of a design evaluation of the amended scheme this is set out in detail in the remainder of this section. Given the significance of this scheme and the response to it, a full detailed assessment is included. The council's design and conservation manager's comments are embedded into the assessment which is structured into 4 parts:
- Part 1 - Urban design evaluation: this focuses on evaluating the place making qualities of the proposed development. In accordance with JCS 3 and the NPPF the Building for Life method is used to guide the evaluation.
 - Part 2 – Marker building: this focuses on the principle and architectural quality of the proposed 20 storey tower
 - Part 3 - Heritage and townscape assessment: this assesses the impact of the development .
 - Part 4 - Block A: this section focuses on the design of the detailed element of the planning application Block A.

Part 1 - Urban design evaluation

315. The first part of the assessment is an urban design evaluation that is structured around the questions contained in the Building for Life method. They are used to establish whether a successful place will be created. The use of Building for Life is encouraged in NPPF para 129 and JCS policy 2 as a way of ensuring that development is “designed to the highest possible standards, creating a strong sense of place.” A scheme is evaluated against 12 questions and a green, amber or red rating is awarded. Red means that a particular aspect of a development needs to be reconsidered. **Building for Life question one** is about connections and scale and asks - Does the scheme respond to the scale of its surroundings, respect existing view corridors (or create new ones), and reinforce existing connections and make new ones where feasible? 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.
316. There are currently no clear, coherent or pleasant routes through the site. The route between St George's Street and Edward Street is blocked by a surface car park and has no flanking active frontages. People who do walk this way pass an empty building with a blank concrete base to the east and an open car park to the west. There are currently two routes from Magdalen Street to St Augustine's

Street. The main route along Sovereign Way is overshadowed by the underside of the cinema and the vehicle bridge above. Ann's Walk is a threatening tunnel with no sight lines between Magdalen Street and Anglia Square. Buildings at the upper levels such as Gildengate House and the cinema are accessed on foot via staircases and across vehicular circulation routes which are hard to find and unpleasant to use. Anglia Square feels sealed off from the city and at night there is no natural surveillance or activity making it a barrier to movement in the city and a place to avoid.

317. The most important and beneficial design element of the proposed development is the reconnection of strategic movement routes through the site between historic streets for pedestrians. This is at the heart of the applicant's design narrative as described in their design and access statement (p70-73). Two primary routes are catered for: 1. St George's Street to Edward Street north-south route; 2. Magdalen Street to St Augustine's Street east-west route. These routes generally follow the alignment of historic streets that have been lost. The north-south street is proposed to be named St George's Street to reflect the continuity of connection from the existing St George's Street to the south of St Crispin's Road, which has been facilitated by the recent replacement of the subway with crossings on the surface.
318. The east-west street would be called Botolph Street in memory of the historic street that was obliterated when the flyover and Anglia Square were built. The currently sealed-off nature of Anglia Square would be much improved with a clear line of sight to St Augustine's Church that helps with intuitive wayfinding and celebrates that heritage asset. The new view of the Anglican Cathedral from within Anglia Square would provide a useful point of orientation when walking east towards Magdalen Street.
319. There is a less significant pedestrian desire line between Cowgate and Pitt Street that would not be served by the proposed development due to the large footprints of the three blocks A, E/F and H/G. Ann's Walk, which is on that alignment, is proposed for removal rather than enhancement. If Ann's Walk had been upgraded it would then have required the two conjoined blocks E/F and H/G to both be bisected. This would have necessitated a fundamental rethink of the position of the proposed cinema and the internal car park and servicing arrangements for both blocks. 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.
320. This building for life question also involves thinking about the location of vehicular access to the development and the condition of the edge of the site. The new east-west and north-south routes would only be for pedestrians and cyclists. Motorised vehicles would not undermine the quality of the experience of using these routes.
321. The southern part of Edward Street, against which block A is proposed to be built, is currently lined by a service yard and semi-derelict, ugly and empty buildings, with the exception of Dalymond Court. This would be replaced by the north elevation of block A, rising to nine storeys with seven storey projecting elements. The street will benefit from the activity generated by people walking to and from the three residential ground floor entrances and the side window of the shop that would turn the corner into St George's Street, as well as a commercial unit fronting

Edward Street. Many flats and their balconies also overlook the street providing some natural surveillance. The pavement width has been maximised at ground floor level through the use of a colonnade but the pavement would be interrupted by the car park and service yard accesses. The relocation of the Surrey Chapel to the north side of Edward Street would also create activity and has the potential to create a positive street frontage, subject to its detailed design. Some of the benefit to the edge condition of the street that would be gained by providing new buildings on Edward Street would be negated by the overshadowing caused by the height of the buildings to the south of the street, which would leave it in almost permanent shadow and give it an unbalanced cross-section which much taller buildings on the south side of the street than the north.

322. The north end of Pitt Street is an open void with a soil bund partially concealing surface car parking. The change to the edge condition resulting from the proposed development would be similar to that described above for Edward Street, although the proportion of active frontage is likely to be greater and the degree of overshadowing less due to the east-west orientation of the street. The footway on Pitt Street would be wider with planting proposed to create a greener street to complement the Gildencroft open space.
323. The pavement on the west side of Magdalen Street is currently narrow (2.4-2.9m) for the volume of pedestrian traffic, with an over-hanging building that shadows the pavement and makes it feel more confined. Magdalen Street would benefit from the increased pavement width easing pedestrian flow and the part of block A that is proposed to front the street would remove the pavement overhang.
324. A successful feature of the proposals is the establishment of a link between Rose Yard and Edward Street this would give residents in block B an important opportunity to access the Leonard Street play area and St Augustines Street avoiding the need for young children to cross busy roads.
325. This question also invites consideration of how well the scale of the scheme relates to its surroundings. Later sections of this document consider this question much more deeply in relation to the impact on heritage assets and the wider cityscape. Numerous policies, including PGN7.90, expect new development to be sensitive to the scale of existing buildings in their vicinity in order to respect the character of the area. To help guide and explain the design of the scheme to meet these policy tests the applicant's Built Heritage Statement includes a "heat map". This is intended to indicate thresholds of height across the site, which, if exceeded, would have a major impact on the setting of heritage assets. It is relatively crude and its limitations are highlighted - "it is acknowledged that the cumulative impact that would result from development that approaches the recommended thresholds in all parts of the site cannot be deduced by reference to the proposed thresholds alone." Also, while major impact is acknowledged above these thresholds it is logical to accept that moderate impact can be caused at heights below these thresholds.
326. Most of the development would reach these thresholds and parts would exceed it. This fact is acknowledged by the applicant through the identification of white areas on the heat map. The street sections within the development show a more extreme ratio of height to width than is characteristic of the conservation area. Overall the mass of the whole development would make it look, from certain vantage points like the Castle ramparts and the pedestrian refuge on Aylsham

Road, as a “city within a city” in contrast to the scale and character of its surroundings. It should be acknowledged however that Anglia Square already has these anomalous characteristics when viewed from a distance. For these reason the mass of the development, which is a result of the height of the proposed building combined with their large footprints, will not successfully harmonise with its surroundings.

327. The applicant has attempted, with some success, to modulate the height of buildings in response to the different edge conditions and break up the roofline through creating the appearance of individual building with an overall common block footprint. Two and three storey buildings characterise the area to the north and east of the development around St Augustine’s Street, Magdalen Street, Edward Street, Estelle Street and Leonards Street with Dalymond Court on Edward Street higher at four storeys. The plot widths of buildings are generally quite narrow at 5-6m. Main streets are interrupted by alleyways and side streets. Exceptions to this pattern are Epic Studios and Roys on Magdalen Street. To the south of the development are buildings of greater height and larger footprint facing St Crispins Road. There are also former factory buildings around Colegate and Oak Street that break the pre-industrial pattern with larger footprints and reaching 4-5 storeys (with higher floor to ceiling heights than residential buildings). The existing buildings at Anglia Square are also antithetical to the traditional pattern of street based, low rise, narrow plot width buildings. The scale of buildings surrounding Anglia Square is therefore not consistent. It is clear, however, that the proposal buildings create an area of development that is overall greater in height and building / block footprint than any other part of the city centre apart from the area around Surrey Street, All Saints Green and St Stephens Street.
328. The three storey terraced housing within block B would replicate the form of the terraced housing on Leonards Street, which it backs onto. The flats fronting New Botolph Street in block D and block B are four storeys, with block D rising to five. This manages the transition from St Augustine’s Street and Edward Street to higher buildings within the development. Block C (replacement Surrey Chapel) will harmonise with the surrounding buildings within Beckhams Court and Dalymond Court and to the rear of Magdalen Street.
329. There is an abrupt change in scale to the parts of block A on the south side of Edward Street which rise seven to nine storeys and form part of a block with a very large footprint. Although the nine storey elements will be mostly hidden in views along the street because the seven storey parts project further out, this part of the development will fail to integrate well into its surrounding in terms of scale. This is also apparent and problematic in views from further away to the north as described in later sections of this document.
330. Block A is lower at four storeys where it meets Magdalen Street, which will relate well to other buildings in the street. However, the buildings behind the Magdalen Street frontage build up quickly from 4 to 7, 9 and 11 storeys and this discordant relationship will be strongly apparent in views towards Magdalen Street from Cowgate (view 35), although less so within Magdalen Street itself, where the view is more channelled along the street.
331. Blocks F & G along St Crispin’s Road are between eight and twelve storeys. The width of St Crispin’s Road and the size of buildings opposite mean this is the least sensitive edge and can take buildings of considerable height. Furthermore recent

planning approvals for St Marys Works and St Crispin's House have included tall buildings. However there is some concern that the twelve storey hotel building on the corner of Pitt Street and St Crispin's Road, which steps down slightly into Pitt Street to become a nine storey building element, will present a sudden change in scale from its surroundings due to the length of a single building element wrapping around the corner at the back of the footway.

332. The building elements of block E/F on Pitt Street reduce in scale from south to north as they move towards the more sensitive environment of St Augustine's Street, which is an appropriate strategy, although their height will still be higher than by a storey or two than is desirable. The absence of buildings of any scale to the west of Pitt Street will mean that this edge will mark a very strong change in the character of building within this part of the city.
333. **Building for life question two** is about facilities and services and asks - Does the development provide (or is it close to) community facilities, such as shops, schools, workplaces, parks, play areas, pubs or cafes? The scheme is judged to receive a **green** rating for the reasons explained below and elaborated elsewhere in the committee report.
334. The development would take place in a vibrant part of the northern city centre that is well endowed with a variety of facilities and services that are easily accessible on foot or bicycle. The development itself would provide better accommodation for shops and a cinema on the ground floor than the current space at Anglia Square. The residents would be able to descend from their flats above, emerge from the residential lobbies and have facilities almost literally on their doorstep. The changing places toilets would be a new and very welcome facility that would help people with disabilities to access the facilities in the area. The public activities within the development would be conveniently and visibly located on the main public routes and in the two public spaces.
335. **Building for life question three** is about public transport and asks - Does the scheme have good access to public transport to help reduce car dependency? The scheme is judged to receive a green rating for the reasons explained below and elaborated in other sections of the committee report.
336. Every bus between the north of the city and the city centre passes along Magdalen Street with opportunities to get on and off those buses at stops on Magdalen Street next to the development. The very high density residential development would mean that around 1200 households would have good access and convenient to public transport.
337. **Building for life question four** is about meeting local housing requirements and asks - Does the development have a mix of housing types and tenures that suit local requirements? The scheme is judged to receive an **amber** rating for the reasons explained below and elaborated in other sections of the committee report.
338. The information on housing need demonstrates a need for one and two bedroom properties and that those who require affordable housing predominantly need one-bed properties. The scheme would supply a large quantity of homes meeting this specification. A proportion of the homes would be affordable housing although the number is significantly below the target level for development of this scale.

339. **Building for life question five** is about character and asks – Does the scheme create a place with a locally inspired or otherwise distinctive character? The scheme is judged to receive an **amber** rating because it would create a distinctive sense of place but not one that is fundamentally derived from the character of the local area. Further content relevant to this question is offered in the section evaluating conservation area character.
340. The character of development that is proposed is a bold, modern, high-density, unashamedly urban, mixed-use quarter for the city. The public spaces would be rich and interesting, animated by public activities and the pedestrian connections would open it up to the rest of the city. Although its immediate surroundings vary in character, the proposed scheme is clearly different to its surroundings and it would create its own character rather than mirroring that of its surroundings. Anglia Square is currently different in character to its surroundings, hence it having a discrete character area designation in the city centre conservation area appraisal. Ideally, it would have been desirable to see the proposed development integrate with the traditional fine-grain development pattern that survives in Magdalen Street and St Augustine’s Street, Calvert Street and St George’s Street from before the arrival of Anglia Square and St Crispin’s Road. However 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.
341. The building typology (mansion, warehouse, town house and connector blocks etc) helps to give some internal differentiation to the development in terms of material expression and the “connector” typology effectively links other typologies to give some variety along long façades. The choice of brick as the predominant façade material helps to integrate the scheme into its locality because brick is widely used in the locality. The tower lends distinctiveness and identify to the development, but not in a way that is locally inspired. Similarly the mesh cladding to the car park façade on Edward Street does not take any cues from the local vernacular, because a multi-storey car park is not part of the vernacular of Norwich, but it would be a memorable and interesting component of the development that exceeds the strictly utilitarian requirements of the typology and offers something unique to the city.
342. **Building for life question six** is about working with the site and its context and asks - Does the scheme take advantage of existing topography, landscape features (including water courses), wildlife habitats, existing buildings, site orientation and microclimates? The scheme is judged to receive a **green** rating in relation to this question for the reasons described below and in the landscape section of the committee report.
343. This question invites consideration of how the existing assets on the site can be used to enhance the quality of the scheme. The mature trees on the St Crispin’s Road frontage are such an asset. Most of the trees would be retained and new tree planting would make them feel less isolated as an enclave of vegetation in a hard area. Another type of asset on the site that will be exploited are the views to St Augustine’s Church, the Anglican Cathedral and activity on Magdalen Street – the response to question one has already complimented the improved sight lines between these assets and the public spaces within the development.

344. Most of the existing buildings on the site would be demolished. The removal of Sovereign House, the multistorey car park and the cinema, which blight the site, would create the conditions where the urban design quality of the site can be improved. Less positively (but less significantly than the removal of the negative buildings on the site) the locally listed buildings at 43-45 Pitt Street would be demolished to make way for the development, which will cut off a link to the history of the site.
345. Residents within the development would have views towards either the new streets and squares within the development or the roof gardens. These roof gardens can offer habitats for flora and fauna on a site that is currently ecologically barren. The potential to exploit solar gain through the orientation and height of buildings has not been taken, in order to prioritise the need to connect streets on sensible alignments with buildings that address those streets, which the building for life method would acknowledge as reasonable justification.
346. **Building for life question seven** is about creating well defined streets and spaces and asks - are buildings designed and positioned with landscaping to define and enhance streets and spaces and are buildings designed to turn street corners well? The scheme is judged to receive a **green** rating in relation to this question for the reasons described below.
347. The proposed streets are very well defined by the adjacent buildings and planting within the streets and are not subservient to carriageway alignments. The re-establishment of built frontages onto Pitt Street and Edward Street and an improvement to the Magdalen Street frontage will be particularly beneficial and transformative. The buildings would successfully avoid creating dead corners by having windows facing in both directions. The windows are a generous size giving good outward surveillance.
348. The buildings flanking the streets are a substantial height (ranging from 2 to 12 storeys) but the combination of generous street widths (between 10m and 18m) and the visually rich landscape of trees and street furniture gives an acceptable sense of enclosure.
349. The buildings surrounding Anglia Square open space and Sovereign Way would be oddly proportioned as a group. To the west, north and east sides are a formidable layering of buildings ranging from six to eleven storeys. This would create an unfortunate lop-sided contrast with the south side where the retained two storey element will fail to enclose the space. The positive aspect of this is that it would admit more light and allow the proposed squint view of the Anglican Cathedral to be appreciated.
350. **Building for Life question eight** is about whether it is easy to find your way in the development and around and asks - is the scheme designed to make it easy to understand the links between where people live and how you access the building, as well as how you move through it? The scheme receives an **amber** rating because while the entrances to residential lobbies would be clearly marked at regular intervals on the perimeter of blocks, the corridors within the building that mostly lack external windows could feel disorientating and convoluted, especially for those people that live at the end of those corridors. This arrival experience will undermine the applicant's declared intention of creating a "living above the shop" rather than "living above the shopping centre" feeling.

351. **Building for life question nine** is about active streets and asks – does the development engage with the street so passers-by will understand the movement between the building and the street, and is there an obvious visual link between the inside and outside? The scheme is judged to receive a **green** rating for the reasons explained below.
352. The streets within and surrounding the development have numerous entrances to shops or residential lobbies. The lobbies are provided at sufficiently regular intervals without interrupting the flow of active shopfronts. Assuming the retail strategy and market demand are sufficiently robust for the shop units and café spaces to be occupied, the shopfronts will provide activity to both the main routes through the development and along Magdalen Street. The hotel and commercial units on Pitt Street have the potential to animate that street too.
353. The pedestrian entrances to the public car park would be located on the proposed new section of St George's Street and within Anglia Square. The car park also serves Magdalen Street and it would have been convenient for shoppers and beneficial to Magdalen Street if an entrance had been provided immediately south of 100 Magdalen Street. This would mitigate the risk that the development is too inward looking with the most active streets and spaces on the inside.
354. **Building for life question ten** is about cycle and car parking and asks – *will the development be likely to support and encourage cycling by providing cycle storage, which people can use with confidence? Where parking is provided, is this easy to use? Are accesses to car parking designed not to impact on those not in cars? Are entrances to car parks over-engineered, visually obtrusive or obstructive to pedestrians and cyclists?* The scheme is judged to receive a **green** rating for this question because the cycle parking is abundant and relates well to residential entrances and the cycle routes through the development that have been created. There will be no car parking within the external areas of the development so the only points where the pedestrian experience is compromised will be the two multi-storey car park entrances.
355. **Building for life question eleven** is about shared spaces and asks – *is the purpose and use of shared space clear and is it designed to be safe and easily managed? Where semi-private or private spaces are created, are these clearly demarcated from the public realm?* The scheme is judged to receive a green rating for the reasons explained below and in the landscape section of the committee report.
356. The position of two main open spaces is well judged. The intersection of St George's Street and Botolph Street is a natural focus of activity and St George's Square will exploit this. Anglia Square is being relocated further east and retains its good proportions. It will clearly be an important focus within the development and the wider area. It is regrettable that there are only two points of entry into Anglia Square so it is an incident on a route rather than a meeting of routes. Additional entry points associated with more pedestrian permeability (discussed under question one) could have offered this. The cinema is a good anchor for St George's Square and it is logical for this space to be described as more active in the evening than Anglia Square. The overshadowing that St George's Square would experience will limit its attractiveness in the daytime so the emphasis on evening use is appropriate. The supermarket gives logic to the description of Anglia Square as more of a shopping orientated daytime space.

357. The parameters plan for the public realm refers to the dimensions of the squares being “up to” 29m x73m and 33m x 46m creating a risk that these dimensions could be reduced. It will be necessary in the event of planning permission being approved that the resulting areas of 2291sqm for St George’s Square and 1518sqm for Anglia Square should not be reduced.
358. There is a clear distinction between the public spaces (streets and squares), the semi-private spaces (podium gardens) and private spaces (balconies). Each has the potential to be very successful if the landscape strategy is carried through into the detailed execution of the scheme. The public spaces are likely to be actively used and vibrant places due to being on natural desire lines and fronted by shops and places to eat. The programming of events and activities in the public spaces should augment this. The spaces will be publicly accessible but privately owned and managed. It is important that in spite of the private ownership and management, the activities that are normally associated with public space are allowed to happen which should be secured through the imposition of a planning condition in the event of planning permission being approved.
359. **Building for life question twelve** is about private amenity and storage and asks – *Are outdoor spaces, such as terraces and balconies, large enough for two or more people to sit? Is there opportunity for personalisation of these spaces? Is waste storage well integrated into the development so residents and service vehicles access it easily whilst not having an adverse impact on amenity for residents?* The scheme is judged to receives a **green** rating. 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.

Part 2 : The tower

360. The 20 storey tower, is the most prominent feature of the proposed development. The presence of the tower in the scheme and to a lesser extent the large-scale form of the rest of the development was the main factor that triggered the positive screening that this is development covered by the requirements of the Environmental Impact Assessment regulations. The tower has been one of the most controversial elements of the scheme receiving many of objections and some supportive representations. The evaluation of the tower has taken into account the advice in Historic England’s advice note on tall buildings (December 2015) and so in order to ensure that the impact of the tower could be properly assessed the applicants were advised at pre-application stage that the tower would need to be submitted as a detailed part of the application.
361. The applicant has explained that a twenty storey tower has been included in the scheme to provide more housing and to serve important design purposes. This design purpose is described as providing “a pivotal landmark and a wayfinder for Anglia Square from distant viewpoints” in a part of the city centre that “lacks an obvious landmark”. It is also argued that it “serves an important civic function” as a “gateway marker from the north”. The applicant also contend that this step up in scale is an evolution from the nineteenth century insertion of larger factory buildings and twentieth century development office buildings into the formerly medieval scaled area to the north of the river Wensum. The current proposal is presented as an excellent piece of architecture that is a “counter-point” to the landmark

buildings to the south of the river, especially the Anglican Cathedral, which it is said to reinforce and celebrate.

362. Design South East undertook an authoritative independent design review of the original 25 storey tower on 26 April 2018. The advice provided to the council was critical. In the summary of their comments they stated:

In this sensitive location, the proposal for a high-density scheme including a 25 storey tower is highly controversial, and therefore additional scrutiny is required to ensure exceptional design standards are met. This is a unique opportunity in this historic setting, and no matter how this tower is resolved, the scale and location mean it will be highly prominent. Therefore, it is unhelpful to consider how a polite approach can help it fade into the background. We do not consider that this proposal yet demonstrates sufficiently special design standards, and the applicants should further consider issues such as, how it can sit more comfortably in relation to the Cathedral and other key historic buildings, how it could act as a tourist attraction, and how a more elegant and slender appearance can be achieved. There should be further exploration of the specific qualities of local materials, and how a more crafted approach to elements such as the balconies could help inform design development. ... The colonnaded ground floor has started to address the surrounding square and is a good ... response to the public realm; the relatively small floorplate of the tower also helps reduce the bulk. ... However, the key issue is how the tower will be viewed across the city, and we are very concerned by the impact the scheme has on many of the verified views. Historic locations such as St Augustines Church and the Cathedral Close are particularly problematic.”

363. Since the original submission in March the tower has been thoroughly redesigned in response to concerns expressed by Design SE, the local planning authority and other stakeholders.

364. In terms of evaluating the amended tower proposal, the first issue to consider is the principal of building a tower in this location. The applicant has sought to justify this key component of the scheme on four grounds.

365. Ground 1 - *Significant public spaces in Norwich are marked by taller landmark buildings* (e.g. the Market Place addressed by City Hall and the Castle and The Upper and Lower Close addressed by the Anglican Cathedral) and according to the applicant it therefore follows that St George's Square is a new space in the city centre that should be marked with a landmark building. This argument has some credibility although other public spaces in Norwich do not have a single landmark (e.g. Tombland) or have a landmark that is not tall (e.g. St Andrew's Plain) so it does not follow that a new public space in the north of the city centre needs a tall building or a single landmark. This argument is further weakened by the fact that all the landmark buildings that positively punctuate the skyline and define public spaces have a civic or spiritual purpose. A residential building could not perform this function as effectively.

366. Ground 2 - *The gateway entry into the city centre from the north should be marked with a landmark building.* Local plan policy DM3 says “Major development within 100m of the main gateways to the city, as defined on the Policies map, will only be permitted where its design is appropriate to and respects the location and context of the gateway. New landmark buildings of exceptional quality will be accepted where they help to define or emphasise the significance of the gateway.” The

proposals map shows a gateway location on St Augustine's Street and another on the Duke Street roundabout. This policy does not state that a landmark should be tall but rather expects it to stand out in some way and be appropriate to its location. To a large extent the consideration of appropriateness relates to the impact of the tower on heritage assets, which is addressed in a later part of this document. Strictly speaking this policy would not apply because both gateways are about 150m from the location of the proposed tower, although it is acknowledged that in general terms this is a location that marks people's arrival in the city centre and the value of seeing a building within the "defended city" from outside the city wall at Magpie Road near the former location of St Augustine's Gate is acknowledged when considering the impact on that heritage asset later in the report.

367. *Ground 3 - The regeneration of Anglia Square should be symbolised and advertised through the erection of a prominent building of exceptional architectural quality.* In terms of the historical evolution of the city such a dramatic gesture is in conflict with the pattern of development where activity, investment and civic focus have been concentrated to the south of the River Wensum. The response from Historic England makes this argument very strongly. However, the pattern of a city's development is not fixed. It can be argued that providing the overall focus of building height and prominence remains to the south of the river, a strategically positioned tower in the north of the city could be justified in terms of denoting how the area to the north of the river is no longer the "poor relation" to the south. There is a need to address and heal the demotion of this part of the city centre through neglect and lack of investment that was accelerated by the construction of the inner ring road, which severed it physically and perceptually from the rest of the city centre. The recent construction of the new crossing over St Crispin's Road and the proposed extension of St George's Street through the proposed development are essential components of this healing and the construction of a tower that advertises a focus of activity in this part of the city centre would further encourage people who do not live in the area to treat Anglia Square as part of the city centre and be more inclined to visit it.
368. Anglia Square has been uniquely blighted by the damaging legacy of previous development. This along with the highly visible deterioration in the physical appearance of the site has created a perception amongst many in the Norwich area, and the wider development sector, that this is a place to be avoided. This site unlike any other within central Norwich is integral to the regeneration of an entire sector of the city. Development of Anglia Square has the scope to deliver transformative change, and allow the northern city centre to contribute and strengthen the wider Norwich city centre economy. A tall building on this site would recognise this stage in the evolution of the city.
369. *Ground 4 - A tower would be a waymarker helping orientate people moving around the city.* This is indisputably true and would be a benefit of building a tower.
370. If it is accepted that the principal of building a tower in Anglia Square is a legitimate proposition, and ground 4 in particular provides legitimacy, the question arises about where within the scheme it should be positioned. The proposed position has been determined by several factors, which are all logical and sensible:

- i) Avoid blocking views of the Anglican Cathedral from Aylsham Road and St Augustine's Street or positioning it too close to the visual envelope of St Augustine's Church when viewed from the back of its churchyard.
- ii) Marking the location of the largest public space within the development at a point where its base can act as the "hinge" where St George's Street slightly varies its alignment, with the effect that the building has greater presence within local views along St George's Street.
- iii) Opposite the cinema with St George's Square creating a "dialogue" between these two significant buildings.
- iv) Break up an otherwise excessively long façade of block E/F on the west side of St George's Street.

371. The proportions and shape of the tower are considered next. The aim of the revised design of the tower has been to design the most slender and elegant looking structure possible without breaching a height limit of 20 residential storeys, which was deemed by the applicant to be the maximum they could build without unacceptably harming the setting of heritage assets. Their challenge is made even harder because from many views the tower is being seen against buildings within the scheme that are up to twelve storeys high, such as those immediately to the south. This means that the clear height of the tower is eight residential storeys or 24 metres. So there is a tension between achieving a high quantum of development on the rest of the site and minimising the harm in long views with designing a tower that looks slender. Within this difficult brief the applicants have used several architectural devices to give vertical emphasis:

- A single integrated structure rather than a lantern at the top that would have given the rest of the building a bulkier appearance.
- Pale brick piers that extend the full height of the building.
- Minimal emphasis on the horizontal spandrel panels subdividing the floors.
- Slim metal fins, brick patterning and a perforated parapet at the top that draw the eye upwards.
- A fold on the four main facades to introduce subtle extra vertical lines.
- Inset balconies rather than projecting balconies on the corners so that the width of the structure is identical on all axes.

372. The criticism made by Design SE that the previous design of the tower would appear generic and corporate has been largely addressed through these measures, which not only address the need to appear sufficiently slender in spite of the reduction in height but also make the tower different to towers in other cities and different in colour and detailing (as well as proportions) from the other building proposed for the scheme. The concave faceted façades are a particularly interesting feature that would probably have more effect than the visualisations suggest. There is a concern, however, about whether the interesting detailing, like the patterned brickwork and the folds in the façade, will be perceived at a distance (e.g. in views from St James' Hill and Ketts Heights).

373. The design of the tower base is also strong. It is visually strong because four of the brick piers would descend into the ground with a double height entrance space behind. This would root the building boldly in St George's Square and the entrance would be of appropriate proportions for the building by arresting the eye as it travels round the space. The folded façade would also be expressed in the

placement of the columns as seen on the ground plan which would differentiate it from the straight building lines along the rest of St George's Street.

2. The tower will not provide an opportunity for public views from the highest point of the development as expected in PGN7.89. However, the scheme does propose to allow the public to access the hotel bar and restaurant in block E/F, from which the view of the city centre would be almost equal to that from the tower given that it is closer to the landmark buildings of the city centre. It should be made clear to members of the public that this view is available for people who are not hotel patrons or necessarily even interested in buying food or drink from the hotel. This may need to be conditioned if planning permission is granted.
374. A number of objectors have highlighted the risk that if this tower is built there is a danger that it could set a precedent for a cumulative increase in the height of buildings across the city centre, which would harm its character. Even though careful attempts have been made to mitigate the harm that would be caused to the historic character of the city through the redesign of the tower, it is clear that harm would be caused. However, a compelling case has been made to justify the inclusion of the tower notwithstanding the harm to heritage assets that will occur. Other developers should not feel emboldened to submit schemes for tall buildings that harm the historic character of the city unless they can show that they have mitigated the impact through careful architectural design, avoided egregiously harmful impacts (such as the previous version of the Anglia Square tower appearing clearly above the roof line of grade 1 listed buildings in the Upper Close) and have a compelling overall planning justification.

Impact on heritage assets and townscape

375. The Planning (Listed Buildings & Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affects a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (section 66 (1)). Special attention must also be had to the desirability of preserving or enhancing the character or appearance of the conservation area. NPPF paragraph 190 requires local planning authorities to identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) and take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal. "Great weight" should be given to the conservation of heritage assets (paragraph 192) and the implications of identifying levels of harm in relation to different grades of heritage asset are explained in paragraphs 194-197 of the NPPF. 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. Furthermore DM9 requires development to maximise opportunities to preserve, enhance or better reveal the significance of designated heritage assets.
376. The site lies within the city centre conservation area and the size of the development proposed will have an impact on the city centre conservation area, a very large number of highly graded listed buildings within it and some beyond it. It will change the setting of those assets and the contribution the setting makes to the appreciation and significance of those assets. Two locally listed buildings are

proposed to be demolished and the requirement of DM9 to obtain a legally binding commitment from the developer to implement a viable scheme before any works affecting the asset would be necessary in the event of planning permission being approved.

377. The application has been accompanied by a Townscape and Visual Assessment, Built Heritage Statement and a compendium of verified views. The heritage statement assessment includes a five step method of assessing the how the development would affect the setting of heritage assets – this follows the guidance given in Historic England’s document “GPA3: The Setting of Heritage Assets” (Dec 2017). Step 1: Identify which heritage assets and their settings are affected. Step 2: Assess the degree to which these settings and views make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. Step 3: Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it. Step 4: Explore the way to maximise enhancement and avoid or minimise harm. Step 5: Make and document the decision and monitor outcomes. Step 4 was part of the pre-application negotiations and has been explained in the applicant’s documentation but does not form part of this assessment because the applicants have now indicated that the amended scheme in terms of quantum and form of development is fixed and no further opportunities exist for enhancement or mitigation of harm.
378. In terms of step 1 the applicant has thoroughly itemised the assets whose significance could be impacted by the development. Their approach to establishing distance thresholds for different depths of analysis according to the grade of listing is a pragmatic and proportionate way of approaching the task. Further the applicant’s assessment of the contribution setting (step 2) makes to the significance of the assets is judged as thorough.
379. Step 3 where the effects of the development on the setting of heritage assets are assessed forms the focus of the following paragraphs . The applicant’s assessment is set out in townscape and visual impact assessment section of the Environmental Statement. The main evidence for effects can be found in the compendium of views supplied by the applicant that show before and after images of the development from viewpoints specified by the local planning authority that show the development at its most visible in relation to the highest graded and most sensitive heritage assets.
380. The method used in the townscape and visual impact assessment involves ascribing a sensitivity rating and magnitude of change rating for each view. Ratings are very low, low, low-medium, medium, medium-high or high. The combination of these ratings results in a rating of the importance of the effect: minor, moderate or major. A professional judgement is made and explained about whether the effect is adverse, neutral or beneficial resulting in nine possible categories of effect: minor-adverse, minor-neutral, minor-beneficial, moderate-adverse, moderate-neutral, moderate-adverse, major-adverse, major-neutral, major-beneficial. The cumulative effect of the Anglia Square development occurring in addition to the consented developments at St Crispin’s House and St Mary’s Works have been assessed and officers have concluded that this would not change the ‘effect’ ascribed to Anglia Square alone.
381. The table below lists the conclusions of the councils design and conservation managers and his townscape and visual impact assessment with reference to the

verified views .They differ from the assessment conclusions provided by the applicant in their Environmental Statement. Additional viewpoints were added at the request of Historic England, Norwich Society and other stakeholders as part of the consultation on the original application.

| Anglia Square Townscape and Visual Impact Summary | | | | |
|---|-----------------------------------|-------------|---------------------|---------------------|
| Viewpoint | Viewpoint name | Sensitivity | Magnitude of change | Residual effect |
| 4 | Angel Road | Low | Medium | Moderate-Neutral |
| 7 | Mousehold Avenue | Low | Medium | Moderate-Neutral |
| 7A | Mousehold Avenue panorama | Medium | Medium | Moderate-Adverse |
| 8 | Motram Monument | High | Medium | Moderate-Adverse |
| 9 | Ketts Heights | Medium | Medium | Moderate-Neutral |
| 10 | Ketts Hill | Low | Medium | Minor-Adverse |
| 11 | Outside Forum | High | Low | Moderate-Adverse |
| 12 | Castle rampart | High | Medium | Major-Adverse |
| 13 | Junc Gentlemans Wlk / Davey Pl | High | Very Low | Minor-Adverse |
| 14 | Aylsham Road outside no 22 | Medium | Medium | Moderate-Neutral |
| 15 | Junc St Augustines St / Magpie Rd | Medium | Medium | Moderate-Adverse |
| 16 | Junc St Augustine St / Sussex St | Medium | High | Major-Adverse |
| 17 | Magpie Road | Med-High | High | Major-Neutral |
| 18 | Junc Edward Street / Magpie Rd | Low | High | Moderate-Beneficial |
| 19 | OS St James Church, Barack St | Low-Med | Medium | Moderate-Beneficial |
| 20 | Upper Close | High | Very low | Minor-Adverse |
| 22 | Junc Elm Hill / Prince St | High | Low | Moderate-Adverse |
| 23 | Outside 21 Tombland | High | Low | Moderate-Adverse |
| 25 | Junc Wensum Street / Elm Hill | High | Medium | Major-Adverse |
| 29 | Junc Oak St / St Martin's Lane | Medium | Medium | Moderate-Adverse |
| 30 | Junc St Crispins Road / Oak St | Low | High | Moderate-Beneficial |
| 31 | Quaker Burial Ground | Medium | Medium | Moderate-Neutral |
| 32 | St Augustine's Churchyard | High | High | Major-Neutral |
| 33 | St Augustine's Church porch | High | High | Major-Neutral |
| 34 | 107 Magdalen Street | Medium | High | Major-Beneficial |
| 35 | Junc Cowgate – Bull Close | Low | Medium | Moderate-Adverse |
| 36 | Junc Muspole St / Colegate | Medium | Medium | Moderate-Neutral |
| 37 | Junc Calvert St / St George's St | High | Medium | Major-Neutral |
| 38 | Junc Calvert Street / Colegate | Medium-High | Low-Medium | Moderate-Beneficial |
| 42 | 39 Magdalen Street | Medium | Medium | Moderate-Beneficial |
| 43 | 59 Magdalen Street | Low | High | Moderate-Beneficial |
| 44 | Doughty's Hospital | Medium | Medium | Moderate-Neutral |
| 46 | Junc St Mary's Plain / Duke St | Medium | Low | Minor-Beneficial |
| 48 | Waterloo Park | Medium | Medium | Moderate-Adverse |
| 49 | Aylsham Road | Medium | High | Major-Adverse |
| 50 | Bakers Road | Medium | Low | Minor-Neutral |
| 51 | Sussex Street | Medium | Low | Minor-Neutral |
| 52 | Rosemary Lane | High | Low | Moderate-Adverse |
| 53 | City Hall balcony | High | Low | Moderate-Neutral |
| 54 | Norwich Castle battlements | High | Medium | Major-Neutral |
| 55 | Peter Hungate Church gardens | High | Very Low | Minor-Adverse |
| 56 | Fye Bridge | High | Low | Moderate-Adverse |
| 60 | Cathedral Meadow | High | Low-Medium | Moderate-Adverse |

Anglican Cathedral, St Helen's Church and Waterloo Park (Views 7A, 8, 9, 14, 15, 20, 48, 49, 60)

382. The Anglican Cathedral is the pre-eminent building in Norwich and this pre-eminence should remain unchallenged. Its spire is the tallest structure in the city and it is used to symbolize the city in photographs, often in combination with the other buildings that mark the city's skyline: City Hall, the Castle, Roman Catholic Cathedral and St Peter Mancroft. The spire rises in stages out of the tower and is surrounded by four spirelets forming a transcendent piece of architecture that is visible from many places across the city, especially from higher ground to the east and across the Cathedral meadows. Its importance is further enhanced by its spiritual role that has been central to the practice of Christianity in East Anglia for centuries. It is a grade I listed building.
383. DM3 requires the design of new buildings to protect and enhance the significant long views of the major landmarks identified in Appendix 8 of the local plan. The Anglican Cathedral is the most important of these. The City Centre Conservation Area Appraisal Northern city character area analysis (p36) acknowledges that the 1970s office developments around Anglia Square prevent views back towards the major landmarks of the historic city and that redevelopment of the area could open up views and visually reconnect the northern city to the area south of the river. This is reinforced by Anglia Square PGN para 7.88, which identifies the opportunity of the Anglia Square development to reinstate and improve views from the north of the site to major city landmarks, including the Anglican Cathedral.
384. Three views have been provided that feature the Cathedral in relation to the proposed development from elevated vantage points to the east (7, 8, 9). The other iconic Norwich landmarks are also visible from these locations. The essential feature of these views is how they show a collection of buildings, each architecturally distinguished, but together marking the central part of the city where civic, commercial and spiritual activity has been concentrated. The expression of these activities in the northern part of the city has generally been more modest and discrete without a noticeable impact on the skyline to rival the south. The focus of attention from these vantage points should remain the central group, which all possess an importance and a role that justifies their extrovert architectural expressions, with the Anglican Cathedral the most prominent and architecturally distinguished of them all.
385. It has already been noted in the analysis of the proposed tower that there is legitimacy to the introduction of a new feature on the skyline, that the northern part of the city centre is becoming a greater focus of activity and exchange in the city. Furthermore, there is merit in showing the great geographical extent of the historic city within the medieval walls (which is now the city centre serving a city that has expanded far beyond the walls over the last two centuries) though an intervention on the skyline beyond the smaller concentration of buildings south of the river. The skyline of Norwich can absorb a new building of quality that can be appreciated when the viewer surveys the panorama from high vantage points. People who visit these places to appreciate the view are not in a position where they only have time to notice either the cluster of civic buildings south of the river or a new building to the north of the river. It is a composite. The crucial question is whether the appreciation of the central group of iconic heritage assets is

diminished and if so to what extent it is diminished by the arrival of this new building at the edge of the city centre.

386. The view from the Motram Monument on St James Hill (8) is the most sensitive of the three panoramic views due to the ability to see all the city's landmarks and its resulting popularity. The Anglican Cathedral would remain the pre-eminent building but the proposed tower would dilute the focus on the group of iconic buildings to the left, with the Anglican Cathedral at centre and front of the group, causing modest injury to the significance of the Cathedral as a heritage asset by drawing some attention away from it. However, in townscape and visual impact terms this is balanced by the introduction of a new and interesting feature on the skyline that expresses the evolution of the city and the geographical extent of the city centre. This benefit is limited by the inability to appreciate the subtle detailing of the facades at a distance. However, the alternative would have been to design a bolder coloured or shaped building that was visually more defined at distance but as a result of this competed more with the Anglican Cathedral for attention. The effect in visual impact terms is marginally more adverse than neutral. By strictly applying the TVIA method this leads to a conclusion of major-adverse effect, which is a more damning verdict than the scheme deserves due to the mitigating factors described above. This contrasts with the applicant's assessment of a moderate-beneficial effect, which under-estimates the importance of this vantage point as the most important place in the city for people to view the skyline, underestimates the magnitude of change and is unjustifiably positive about the aesthetic quality of the new building on the skyline.
387. From Mousehold Avenue (7A), which is a much less important viewpoint due to being less frequented and more cluttered with other visual features, the proposed tower appears lumpen and its visible bulk would be equal to the slender Cathedral and central to the view, thereby detracting from the Cathedral.
388. In the view from Ketts Heights (9) the proposed tower is less problematic due to it being further away from the viewer than the Anglican Cathedral compared to viewpoints 7 and 8 and therefore relatively modest in scale by comparison. It would not read as such an outlier from this vantage point and would add to the interest of the skyline and help orientation in relation to the geography of the city centre. The arrangement of trees also helps to focus the view on the central group.
389. The setting of the Anglian Cathedral would also be affected by the development when viewed from sensitive locations on the riverside walk alongside Cathedral Meadow (60) and from Waterloo Park (48). The open view across the Cathedral Meadow comprises the Norwich School playing fields in the foreground with the tower and spire of the Anglican Cathedral majestically piercing the sky and the tower of St Helen's Church (grade I) as a more modest partner to the east. Mature trees fringe the view and complement the green sward of the playing fields. The tower would appear more distantly but clearly in this view between the two buildings as a smaller but nevertheless noticeably modern element that would detract from the harmonious scene of historic buildings surrounding the fields. The northern part of block A would also be visible above the 20th century buildings of the unlisted Bishop's House. From the open space at Waterloo Park to the north of the pavilion the tower would be visible to the right of the Anglican Cathedral and would compete for attention. In both these views the impact of the development would be greater in winter (the photographs on which these two visualization are

based were taken in summer) when the leaves have fallen. The effect of the development in both views is considered to be moderately adverse. By contrast the applicant considers these views to be minor-neutral by deeming them to be only medium sensitivity and a low magnitude of change. Their assertion that the view from Cathedral Meadow is only medium sensitivity is not accepted, given that is the main place that one of Europe's finest buildings can be appreciated in an open landscape setting from within its extensive green precinct and alongside the river Wensum walk, that one of the best open air leisure experiences in the city.

390. The observations about view 48 are relevant to the consideration of the impact on the setting of Waterloo Park itself (grade II* registered historic park and garden), which is considered to be minor given the predominantly 20th century context of the park and the very limited visibility of the tower from within the whole park area.
391. The objective to reveal more of the physical extent of the Anglican Cathedral from the area to the north of Anglia Square can be judged through views 14, 15 and 49. These capture the arrival experience from the north as people crest the ridge around the junction of Aylsham Road and Drayton Road and descend towards former location of St Augustine's Gate. The view of the Cathedral would have greeted visitors to Norwich for centuries. Existing buildings on the Anglia Square site currently largely obscure it but the proposed development fails to reveal more from outside the development. In the most distant view from the pedestrian refuge in the centre of Aylsham Road (49) a small additional portion of the tower is obscured. Further down by the bus stop outside no 22 a small amount is revealed and from the junction of St Augustine's Street and Magpie Road (15) there is no discernable change. What is clear however is that the proposed development introduces a large mass of new building into these views which is especially harmful to the appreciation of the Anglican Cathedral when viewed from further up Aylsham Road where the development is central to the view and the Anglican Cathedral more peripheral. The applicant considers that the effect of the scheme on the view from Aylsham Road (49) is moderate-beneficial due to the low sensitivity of the view and the replacement of Sovereign House with high quality architecture further to the right of the Cathedral so allowing the Cathedral to be better appreciated. The Design and Conservation managers views differs. This is an important arrival experience in to the conservation area with a view of the Cathedral and the appreciation of the Cathedral will be diminished by the development the effect to be judged to be major-adverse.
392. The verified views demonstrate that there would be no impact on Catton Park.
393. A new view of the Anglican Cathedral is created from within Anglia Square, which goes some way toward fulfilling PGN policy 7.88 to open up new views of the Cathedral from the north.
394. Although some of the effects of the development are judged to be major-adverse according to the methodology of the townscape and visual impact assessment, this does not quite amount to substantial harm to the setting of the Anglican Cathedral within the meaning of paragraph 194 of the NPPF given that the setting of the Cathedral is already compromised from the north by existing buildings on the Anglia Square site, the Cathedral retains its primary status in elevated views from the east, its setting can still be appreciated from many other viewpoints within

the city and a new view of the Anglican Cathedral is created from within Anglia Square.

Roman Catholic Cathedral (Views 7, 7A, 8, 9)

395. The RC Cathedral is a strikingly impressive grade I listed building. It is the furthest of the central group of landmark buildings from the site and from affected viewpoints but is still prominent because of its location on high ground, although its presence as a city landmark is more important from views to the west and north of the city. Each of the landmark buildings has a different silhouette but as a tower with a rectangular form the RC Cathedral is particularly susceptible to being diminished by other towers that have a rectangular form. This is exemplified by the effect of Winchester Tower when viewed from Ketts Heights (9). The proposed tower at Anglia Square would introduce a third rectangular tower into these views that would harm the reading of the RC Cathedral as a distinctively different form on the skyline. This is most likely to happen in the view from the Motram Monument on St James Hill (8) and Mousehold Avenue (7), where the proposed tower would be significantly larger than the RC Cathedral resulting in its relative prominence being diminished. This is reflected in the judgement that the effect on these views is major-adverse (8) or moderately adverse (7, 9), although it would amount to less than substantial harm to the setting of the RC Cathedral given that the experience of its setting is unaffected from viewpoints in the west and north of the city where its position on high ground is more dramatically apparent. The applicant's more positive view of the effect of the scheme fails to recognize the particular problem resulting from the duplication of the rectangular tower form.

Castle, 45 London Street and St Andrew's Church (Views 8, 9, 12, 54)

396. The Castle and Anglican Cathedral were the dominant buildings introduced by the Normans to subjugate the Saxon population and transform the face of the city. The Castle remains the most prominent building within the central part of the city. It is the physical centre around which the city revolves. The market place established by the Normans at its base and the visual relationship with City Hall on the other side of the market further reinforces its centrality and importance. It is a grade I listed building and scheduled monument. Like the Cathedrals any diminution to its status in relation to other buildings in its setting would harm its significance as a heritage asset.
397. While the Castle is very prominent in views within the city centre conservation area, which are unaffected by the development proposal, it is less prominent in views from outside the conservation area, such as those from the Motram Monument (8) and Ketts Heights (9). Nevertheless, it is part of the group referred to above and there would be a modest diminution of its significance due to the visual competition introduced by the proposed tower.
398. There are considerations that are unique to the Castle that arise from an assessment of views out from the ramparts and the battlements. An important element of the Castle's significance as a heritage asset is its elevated defensive position at the end of the Ber Street ridge, augmented by the artificial earthworks of the motte. Looking out from the ramparts (12) one can see the distant horizon with the green wooded quality of the northern slopes of the city evident and only interrupted by the attractive cupola of the grade II listed former bank at 45 London Street and the tower of St Andrew's Church, listed grade I. The current disused

car park at Anglia Square, whilst ugly, sits below the wooded horizon. There is a sense of being above the city and commanding a wide view. The introduction of a wide mass of buildings proposed for Anglia Square would hide some of the view of the wider landscape by sitting above the horizon. This effect is considered major-adverse. This is strongly at variance with the conclusion of the applicant that the effect is major-beneficial due to a “layering of urban elements”, which fails to acknowledge that the layering at a higher level than the current buildings on the site will obscure views of the wider landscape setting that help to contribute to the Castle’s significance as the city’s central fortification and elevated vantage point. This judgement would not apply to the loftier view from the battlements (54), a view which will become more appreciated if the Castle Keep project happens. This amounts to a less than substantially harmful impact on the significance of the building given that this effect is confined to one part of the view from the castle and only applies to the lower rampart level rather than the battlements.

City Hall (View 8, 9, 11, 53)

399. City Hall is perhaps the best civic building erected in this country between the wars and is listed grade II*. Its significance as one of the defining buildings of the city, viewed as a group from the Motram Monument (8) and Ketts Heights (9), will be modestly diminished along with the others in the group as described above, causing less than substantial harm to its significance as a heritage asset. There is no material harm to the local experience of City Hall from outside the Forum (11) or on City Hall’s balcony (53).

St Peter Mancroft (View 8, 9, 11)

400. St Peter Mancroft is the city’s largest and most opulent parish church, befitting its location overlooking the market place and is listed grade I. Its significance as one of the defining buildings of the city, viewed as a group from the Motram Monument and Ketts Heights, will be modestly diminished along with the others in the group as described above, causing less than substantial harm to its significance as a heritage asset.

The Guildhall and 1 Guildhall Hill (View 11)

401. The Guildhall was the seat of municipal government before the erection of City Hall. It is an individually highly important building listed at grade I and forms part of a civic group surrounding the market place, comprising City Hall, St Peter Mancroft, the Castle and the unlisted but nevertheless architecturally impressive Forum.
402. One of the important architectural features of the Guildhall is the crenelated parapet surrounding the roof, which can be viewed across the market place from the south. In the view from outside the Forum (11), the Guildhall and its parapet have individual definition because of the lower building above the entrance to Labour in Vain Yard visually separating it from 1 Guildhall Hill. The proposed tower will protrude above the west end of the Guildhall roof and sit above and within this gap, thereby diminishing the appreciation of the Guildhall and 1 Guildhall Hill and drawing the eye beyond the market place rather than encouraging the viewer to savour the group of buildings that surround the market place. For this reason the effect of the development on the view is considered to be moderately adverse and the source of less than substantial harm to the setting

of the heritage assets. We disagree with the applicant's view that this effect is neutral by likening it to the supposedly benign effect of seeing 15 Dove Street behind The Guildhall. The appreciation of the roofline of The Guildhall would clearly be better without 15 Dove Street eroding the definition of its roofline against the sky.

St Andrew's and Blackfriars Halls (View 22, 55)

403. This complex of buildings is the most intact set of monastic buildings surviving in England and is listed grade I and has scheduled monument status. The east end of Blackfriars Hall can be seen as an important element of the view looking down Elm Hill towards The Monastery (22). This view is entirely composed of listed buildings of great antiquity. There are no modern elements that mar this effect, which is why the street is considered to be the most picturesque in the city and an essential place for visitors to go. In this view the proposed tower is visible peeping out from behind Blackfriars Hall. Although only a glimpse of the tower is obtained, this is harmful because of the high sensitivity and integrity of the view. The setting of St Peter Hungate church (grade I listed) and 2-8 Elm Hill (grade II listed) also experience less than substantial harm and the townscape and visual effect is moderately adverse. The applicant considers the effect to be neutral, which cannot be correct if one accepts that any intrusion of modern elements into the view beyond this intimate historic streetscape is harmful. In the view from the churchyard of St Peter Hungate (55), which is elevated above Elm Hill, a fuller view of the east window of the Hall and the south end of Britons Arms (grade II*) is obtained but less of the proposed buildings are seen from here than in the view further up Elm Hill, so the effect is considered minor-adverse and the harm to the setting of these building is less than substantial.

St Augustine's Group (Views 15,16)

404. St Augustine's Street was historically the main route of entry into the city from the north-west. A well-balanced composition of historic buildings lines the back edge of the pavement, modulating between 2 and 3 storeys in height. Many are listed and those that are not fit politely into the street. At the end of the street lies Sovereign House, identified as a negative building in the in the Anglia Square conservation area appraisal. It juts into view with its horizontal banding of windows and angular lift tower surmounted by telecommunication equipment. This building would be removed. When viewed from the top of St Augustine's Street (15) the proposed buildings would have some benefit due to the flow of buildings into the proposed Botolph Street drawing the eye, which is an improvement on the current view of Sovereign House, which totally closes down the view. The different blocks and building elements within the view will form an interesting composition to replace the slab of Sovereign House. However, the presence of the tower looming over the scene leads to the judgement that the townscape impact would be moderately adverse because it introduces a new element that is out of scale and character with St Augustine's Street. This effect and the harm it inflicts is even more pronounced at the junction with Sussex Street on the west side of St Augustine's Street (16) with the tower filling the centre of the view and the other proposed buildings crowding in beneath at a scale that is out of character with the modest buildings on St Augustine's Street in the foreground of the view, causing a major-adverse effect. In contrast to the applicant's conclusion that the effect is moderate-beneficial the magnitude of change is judged to be much greater due to the mass of the tower at the centre of the view framed by smaller historic buildings

in St Augustine's Street, with which its character is incompatible. The impact on the setting of the listed buildings in the street would be substantially harmful if the existing condition of the site were not taken into account; but the removal of Sovereign House, areas of surface car parking and soil bunds that face St Augustine's Street means that the harm is less than substantial.

St Augustines Church and 2-12 Gildencroft (View 32, 33)

405. St Augustine's Church (grade I listed) is the only surviving medieval church north of St Crispin's Road. Its brick tower is another unusual and distinctive feature. The 16th century almshouses at 2-12 Gildencroft (grade II) run along the south edge of the churchyard. Sovereign House can currently be seen as a tapering wedge of ugly building above the roofline of the almshouses with the blocky lift tower and profusion of telecommunications equipment adding an awkward extra form to catch the eye.
406. The proposed development will be very clearly seen from the seating area and path in the north-east corner of the churchyard with the church and 16th century almshouses in the foreground of the view (32). The view is highly sensitive and there is a high magnitude of change. Sovereign House has already undermined the historic integrity of the scene and its replacement is welcomed.
407. The relationship between the proposed building and the historic buildings is difficult due to the contrast in scale. However, this contrast is mitigated by the similarity in the proportions of the church tower and proposed tower at Anglia Square when viewed in perspective from the back of the churchyard (32). There is also some conformity between the horizontal layering of the elements of block E/F that echo the strong visual distinction between the brick / flint ground floor and the rendered / half-timbered first floor of 2-12 Gildencroft. The vertical emphasis of the timber studwork on the first floor of 2-12 Gildencroft also faintly echoes the alternating dark and light brick on the bays of the residential blocks behind. These relationships balance out some of the harm that would otherwise have been caused by the dramatic introduction of large-scale modern buildings into the setting of much small historic buildings.
408. The layout of the proposed development would focus the view towards the church along the new Botolph Street from the redesigned Anglia Square and new St George's Square. This would celebrate the importance of the church as a landmark in this part of the city and enable its heritage value to be better appreciated. The church and the buildings within its setting such as 2-12 Gildencroft will form a much stronger part of the pedestrian experience of moving to and from the city centre and this will better reveal the heritage value of the church. The significant harm that would result from the introduction of modern buildings of a discordant scale within the setting of these much smaller heritage assets is largely negated by the combination of redeveloping of negative landmarks such as Sovereign House and the multi-storey car and surface car parks; the interesting architectural echoes between the development and the heritage assets and the use of the church tower as a focus in views out of the development. The harm is therefore less than substantial and the TVIA effect is major-neutral.

City Wall (View 17)

409. The city wall was built in the fourteen century and is a scheduled monument. The section on Magpie Road has recently been revealed through the demolition of the Magpie Printers building and the simple landscape treatment provided in front of the monument. It is opposite the pedestrian crossing at the top of St Augustine's Street and reflects the importance of this key gateway into the medieval city. The alignment of Magpie Road and Bakers Road further highlights the importance of this heritage asset and contributes to the sense of Norwich being a defended city with a profound history.
410. Very little building is currently visible behind the monument from the other side of Magpie Road (17) and the proposed tower would dramatically change this view, conflicting with the very different aesthetic quality of the wall with harmful consequences. Although the tower would make the wall look rather humble as a fortification this harm is balanced by the visibility of a feature that, albeit not contemporaneous with the establishment of the wall, marks the importance of the defended area within the walls. Furthermore, the tower is positioned close to the gateway location on St Augustine's Street designated in the local plan, which takes a permissive approach towards landmark buildings of an appropriate design, and this relationship with the City Wall can be considered to be part of that gateway arrival experience. For these reasons the effect is considered to be major-neutral and that the harm to the setting of the monument is less than substantial.

Building group at north end of Upper Close (View 20)

411. The Cathedral precinct is a separate space within the city where quiet contemplation is encouraged. It is separated from the busy commercial world beyond by the precinct wall. It is essentially a fortified area to which people have always been admitted by a few points of entry, the Erpingham Gate being the most architecturally impressive and affording a view of the west front of the Cathedral. The significance of the Close and the Cathedral as a heritage asset is partly derived from this separateness and introspection, with the Cathedral itself being the beacon that speaks to the rest of the city.
412. The Upper Close is a large area of green space surrounded by important historic buildings, almost all of which are listed. It provides the setting within which those buildings can be appreciated and they are appreciated by many thousands of visitors each year. On the north side of the Upper Close is a range of buildings comprising the Erpingham Gate, 69 The Close, 70 The Close and Canary Chapel (all grade 1 listed with the gate and Canary Chapel also scheduled monuments).
413. Seeing the tower within this historically intact view would have the effect of bringing an awareness of the world outside the precinct into the Close, the effect provided by the north range of building in closing the space formed by the Upper Close would be undermined and the aesthetic appreciation gained from viewing these grade I listed buildings and their heritage value would be significantly harmed. The removal of five storeys from the tower in the amended submission mean that it would be almost invisible from within the Upper Close (20) making the effect minor-adverse and the impact on the setting of these listed buildings and monuments much less than substantially harmful.

Maids Head Hotel (View 23)

414. The Maids Head Hotel is a grade II listed building that forms the northern end of Tombland, which was the pre-Norman market place of Norwich. The proposed tower would be visible from outside 21 Tombland (23) in combination with the Maids Head, thereby drawing attention to a large-scale modern townscape feature beyond the special and harmonious group of buildings around Tombland, of which the Maids Head forms one of the most important elements. The tower would be seen behind the northernmost of four half-timbered gables diminishing the architectural effect of their rhythm wrapping around the corner into Wensum Street, which has a moderately adverse effect in LVIA terms and much less than substantial harm to the setting of the listed building. The applicants consider the effect to be minor-beneficial but their reasoning is not well justified.

St Clements Church / Fye Bridge Street group / Wensum Street group (view 25, 56)

415. The view north along Wensum Street from the junction with Elm Hill (25) is one of the most pleasing in the city. The eye is channelled along the street beneath the jetty and past the fluted columns of the building occupied by Wetherspoons towards Fye Bridge, which was the first and most important river crossing in the city, to the succession of the Mischief pub (grade II listed), St Clement's Church (grade I listed) and 3 Colegate (grade II listed). Each building projects further than the last in an interesting collection of styles and materials (flint, red brick, render, slate, pantiles). The development proposals would add to this view the tower as the culminating element of the street and in doing so diminish the heritage value of the townscape of Wensum Street and Fye Bridge Street and the value of the individual buildings within it. This effect would be reinforced by the visibility of the grey clad upper three storeys of the blocks beneath the tower. This effect would be major-adverse. The tower would remain visible as far as Fye Bridge (56) where the upper storeys will be seen within the view of the important group of listed buildings immediately to the north of the bridge, including St Clement's Church. This effect will be jarring and is considered to be moderately-adverse. The harm to the setting of these listed building avoids being substantial because they can still be appreciated in views south along Magdalen Street, east along Fishergate and west along Colegate without perceiving the adverse juxtaposition with the proposed buildings at Anglia Square. The applicant's conclusion that these effects are beneficial in their LVIA are not well justified and at odds with their built heritage assessment that correctly identifies harm.

St Martin at Oak and 47-49 St Martin's Lane (View 29)

416. St Martin at Oak church (grade I listed) and 47-49 St Martin's Lane (grade II listed) can be seen in the view from the junction of Oak Street and St Martin's Lane (29) in relation to the proposed buildings at Anglia Square. The setting of these buildings is currently poor with chain link fences and a bland red brick building on the north side of St Martin's Lane. The church appears sufficiently strong in the foreground for its setting not to be significantly harmed by the proposed buildings but 47-49 St Martin's Lane would be belittled by the 12 storey element of building fronting the Duke Street roundabout and the tower behind with a moderate-adverse effect and less than substantial harm on the heritage asset.

St George's Street group (View 37)

417. St George's Colegate church (grade 1 listed) and Bacon House (grade 2* listed) combine to create a charming collage of flint walls, brick details and mullioned windows at the entrance to the northern section of St George's Street. Looking northward the view (37) currently dissolves into the void formed by St Crispins Road and the empty car parking land beyond. The applicant's case that providing a marker building signifying Anglia Square as a revived place of activity and interest is valid in this view. This view has therefore been assessed as major-neutral due to the value of infilling the end of the street with visible new buildings being cancelled out by stridency of the tower having an uncomfortable relationship with the subtle historic texture of the foreground buildings. The harm to the setting of the listed buildings is less than substantial due to their distance from the development and that the geographical extent of their setting is mostly unaffected.

Calvert Street group (View 38)

418. The buildings that currently terminate the view north up Calvert Street (38) are architecturally weak – Sovereign House and the bridge spanning the street. The proposed buildings at Anglia Square would be read as a diverse cluster of cubic forms with a lively variety of materials, culminating in the tower drawing the eye down the street. This would improve the view and encourage exploration further north rather than convey the sense that the city centre ends at Colegate. Their distance from the immediate townscape of Calvert Street in the vicinity of Bacon House (grade II*), 1-9 Octagon Court (grade II*) and 29 Colegate (grade II) allows these historic assets to be appreciated in the foreground of the view while adding interest to the background. The effect is therefore considered to be moderately beneficial with no harm to the significance of the assets.

42-48 Magdalen Street group (View 42)

419. Magdalen Street forms the most immediate historic context of the development. It has always been part of the most important north-south route through the city linking to King Street and Bracondale via Tombland. Many of the buildings are listed and the street itself has considerable townscape value and contributes positively to the quality and significance of the conservation area.
420. The building of the flyover and Anglia Square caused significant damage to this street and the project provides the opportunity for enhancement. The development of a complementary project for the area underneath and adjacent to the flyover has been promoted by the owners of Anglia Square as a separate planning application.
421. Looking towards the development from outside 39 Magdalen Street (42) the awkward form of the cinema building is seen in combination with the flyover. The grey flyover slab is strongly seen in relief against the white exterior of the cinema. This harms the setting of the listed buildings at 42-48 Magdalen Street and the quality of Magdalen Street as a whole. The portion of the new development that would be seen would increase in scale by comparison with the cinema but the receding perspective and distance from the listed buildings would mean that it does not significantly intrude into the appreciation of these historic buildings. The buildings seen behind the flyover would be clad in darker materials meaning that

the flyover stands out less. This results in a moderately beneficial townscape and visual effect and no harm to the significance of these assets.

Magdalen Street (View 34, 43)

422. The close up views of the development from 107 Magdalen Street (34) and 59 Magdalen Street (43) illustrate the effect on the setting of 75 Magdalen Street (grade II) and the townscape quality of the central portion of Magdalen Street, which includes a number of locally listed buildings. The building that currently fronts Magdalen Street is a long two-storey slab that projects over the narrow pavement with a strong horizontal emphasis in contrast to the traditional plot widths of shops in the street, exemplified by number 75. The portion of the building facing south has squat proportions, concrete roof tiles, a dated fascia and chunky eaves detailing. This would be replaced by a building of much higher quality with a stronger vertical emphasis, giving a more appropriate sense of enclosure to the street. The seven storey element behind the Magdalen Street frontage is sufficiently set back to disassociate it from Magdalen Street. The effect would be major-beneficial.

Doughty's Hospital (View 44)

423. Doughty's Hospital (grade II listed) lies immediately to the south of Anglia Square and St Crispin's Road. It is an aesthetically pleasing courtyard enclave of homes for elderly people. The view from within the courtyard is currently blighted by Gildengate House and the top of Sovereign House which sprouts randomly and discordantly behind the roof of the Hospital. This would be replaced by a more harmonious collection of buildings spanning the full width of the rear wing of the Hospital. However, the scale of those buildings would be dominant in the view from within Doughty's courtyard and reduce the sense of seclusion from the rest of the city. Furthermore, the ability to appreciate the pair of flanking chimneys that are a defining architectural feature would be diminished because the west chimney cluster would no longer be seen with the sky as a backdrop. These effects cancel out and result in moderate-neutral effect and less than substantial harm to the heritage asset.

43-45 Pitt Street

424. These locally listed buildings would be demolished as part of the proposals. 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, with the exception of the unsubstantiated claims that the development opens up views of the cathedral spire from the north west and enhances views from St. Augustine's Street, Edward Street and Cowgate. Even though the validity of these particular claims are disputed, the justification for demolishing these buildings remains sound.

Impact on city centre conservation area

425. Norwich is a city with an immense wealth of characterful and important heritage assets. Its defining characteristics are captured in Historic England's response.

Norwich is one of England's – and Europe's – great historic cities. Set in the valley of the River Wensum, the historic centre of Norwich can still be read as having

been defined by the longest circuit of city walls in medieval England. Containing more medieval churches than any city north of Alps, large numbers of historic buildings, many of exceptional interest, and streets and spaces rich in character, the centre of Norwich is an extraordinary historic place. The heart of the city is articulated by its major landmarks. On the hills to the south of the river, stand the castle, City Hall, the Roman Catholic cathedral, and a number of the most prominent churches, including St Peter Mancroft and St Giles. Below them, near the river, is the medieval cathedral, one of the great churches of Europe, whose spire rises to form the central landmark of the city. Norwich north of the river has its own character, the streets within the circuit of the walls still rich in historic incident, but without the landmarks of the south.

426. The Anglia Square development's zone of visual influence extends across a large part of the city centre conservation area from the Market Place in the south to Magpie Road in the north and from the river Wensum near Pulls Ferry in the east to the river Wensum near Barn Road in the west. This raises substantial considerations in relation to the impact of the development on the character of Norwich, its strong identity and 'sense of place'.
427. Many of these issues have already been discussed in preceding sections of this document, such as in response to questions one and five of the Building for Life assessment. In terms of considering the development in the context of the city centre conservation area, the management and enhancement policies set out in the conservation area appraisal are material considerations. The appraisal identifies that the Anglia Square character area has the lowest significance in the whole conservation area and therefore has the most potential for dramatic and beneficial change. These are the policies and an assessment of the extent to which they are fulfilled:
428. Historic street patterns and historic building lines in areas of low significance, like Anglia Square, must be reinstated according to cartographic and visual evidence, unless the proposals create a well-designed alternative layout (B2) with special mention given to reinstating an historic route between Magdalen Street and St Augustine's Street (Anglia Square character area M&E3). The scheme achieves this to a large extent, as discussed above in response to Building for Life question 1. The removal of the bridge link from the existing shopping centre to the flyover creates the conditions where it might be possible to remove the flyover at a future date without rendering the development inoperable.
1. **Enhance the setting of the city gates / walls (B4)**. The scheme achieves this to some extent, as discussed in the sections on the City Walls at Magpie Road in the section above on individual heritage assets, and the section about the tower.
 2. **Remove negative landmarks, such as Sovereign House and Gildengate House (C1)**. This is achieved through the demolition of Sovereign House and to a lesser extent the recladding of Gildengate House. The multistorey car park (not identified as a negative landmark in the conservation area appraisal but has become one through its vacancy and increasing dereliction) will also be demolished.
 3. **Preserve and enhance views of citywide and local landmarks (C2)**. No views of citywide landmarks are obscured but the preceding discussion on the setting of the city-wide landmarks does identify significant adverse impacts.

4. **New buildings should be appropriate scale of new buildings (D2) with care given to the design of roof-top plant (D6).** As discussed above, even the applicant through the white areas on the heat map acknowledges that some of the buildings are not of appropriate scale. The rooftop plant will add another 2m to the height of development in many places and in the case of the tower is concealed by a parapet.. It will be important to scrutinise the detail of the plant enclosures and the submitted plans for block A do not explain what material will clad these enclosures.
5. **Open up views of the major landmarks of the historic city and visually reconnect the northern City to the area south of the river through development at Anglia Square (p36).** A view of the Anglican Cathedral from within Anglia Square would be opened up but otherwise the objective of opening up views of major landmarks would not be achieved.
6. **Where the redevelopment of Anglia Square meets existing development along Magdalen Street the existing scale of buildings should be respected (Anglia Square character area M&E1).** The development of a well-designed new four storey building on the Magdalen Street frontage which, combined with slightly moving back the building line, would respect the existing scale of buildings on Magdalen Street, which is predominantly three storeys in the narrow sections. It would also replace the visually poor building that currently occupies this part of the street.
7. **Large-scale buildings appropriate near the ring road (Anglia Square character area M&E2).** Large-scale buildings have been located near the ring road (i.e. St Crispin's Road). Whilst this complies with the policy the east-west alignment of taller buildings alongside St Crispin's Road, albeit with the east section stepped back to respond to the retention of the mature trees, will emphasise the alignment of St Crispin's Road that conflicts with the north-south orientation of historic routes through the area. This creates a tension with the policy objective in B2 above.
8. **Retain the significant open space of Anglia Square in any new development (Anglia Square character area M&E4).** This open space would be retained and enhanced and an additional open space (St George's Square) would be provided.

Architectural treatment

429. The rationale behind the architectural treatment of the proposed buildings is explained in the Design and Access Statement. There are two organizing principles employed. One is based on urban design attributes that acknowledge the emphasis needed to mark entrances, landmarks, and the edges of key spaces as special places. Another typology is based on a subdivision into types based on the scale of building elements – mansion blocks being the biggest, followed by warehouses and townhouses. Connector buildings link adjacent typologies and the marker building is treated separately. In practice the scale-based typology seems to trump the urban design based typology in the production of architectural information for the application.
430. Acknowledging that townhouses generally do not have shops underneath them and mansion blocks tend to be presented as unified and often impressively symmetrical architectural set pieces, unlike here, deepens the terminological confusion. The applicant makes reference to the feel that residents should have of living above the shop but this is not compatible with notion of a mansion block as

a unified entity rather than a series of vertical slices where a shop relates to a set of flats above. The height and corridor access to individual flats will further undermine the sense of living above the shop.

431. Block A is almost entirely composed of mansion blocks, with little variety in the typology and with it being the most challengingly scaled building typology proposed for the site.
432. These typologies are a necessary but unconvincing attempt to conceal the reality of the blocks being three car parks surrounded by flats. Bearing this in mind the architects have produced some surprisingly good elevations with horizontal subdivisions into base, middle and top and vertical subdivisions with alternating brick colours and recesses between bays. Different balustrades for the balconies will add a further layer of variety.
433. The material palette based around brick is welcomed. Brick is a high quality and versatile material that is predominant in Norwich. It offers infinite possibilities of tone and texture. The architects are encouraged to push the possibilities of this material further in the detailed design to differentiate between the typologies and add visual richness at the level of detailed design. The introduction of more patterning in the brickwork on the corner of Magdalen Street and Sovereign Way through the recent design revisions is an approach that could be used more extensively to good effect. Another good feature that highlights a significant corner is the double height glazing on the corner of Botolph Street and St George's Street.
434. The use of dark cladding to the top of the blocks leads to the upper stories of the buildings that are visible in long views of the development having a dull and brooding character. A lighter cladding is proposed for Magdalen Street to reflect the slate roofs in the street and lighting cladding should be used more extensively to lessen the visual weight of the top of the development.
435. PGN7.92 acknowledges that the architectural treatment of Edward Street is a significant opportunity for the enhancement of the street compared to its current condition. Features like the green wall system and the metal screen to ventilate the car park could be signature elements of the design and their successful realisation will be key to this street frontage having visual richness to mitigate its considerable height and bulk.
436. The 6m floor to ceiling height of the shopfronts is the same as that employed throughout the development and will not harmonise well with the single-storey shopfronts elsewhere on Magdalen Street. The windows fronting Magdalen Street would be narrower than elsewhere in the development to reflect the proportions of windows in Magdalen Street. However, they will still be floor to ceiling glazing, which is not characteristic of the street. The perforated metal Juliet balconies may mitigate this effect whilst maximising light and maintaining privacy.
437. The applicants have not provided an explanation of how their choice of materials will reflect sustainability considerations, such as the energy intensiveness of different building materials, so it has not been possible to assess this important aspect of DM3.

438. The materials keys on the detailed application drawings for block A are much more vague about the deployment of materials and product specification than the design and access statement addendum, which itself is insufficiently specific. This is especially true in relation to the cladding of rooftop plant. If planning permission is granted it is imperative that conditions are attached to the permission relating to the choice of material products and the provision of sample panels for inspection and approval.

Main issue 8 Landscaping and open space

439. Key policies and NPPF paragraphs – DM3, DM6, DM8, NPPF paragraphs 9, 17 and 56.
440. The planning application documents include a Landscape Strategy (and addendum). This document and accompanying plans sets out the strategy for: creation of public spaces (including squares, new connections and existing street frontages); provision of children play opportunities; provision of communal garden spaces for the residents and biodiversity enhancements.
441. Amenity space, openspace and green infrastructure are subject to a number of development plan policies. Policies DM3 and DM8 both require development to include open space (including green infrastructure) for the purposes of improving the appearance and character of the development and the surroundings; enhancing biodiversity and ensuring new residents have access to local recreational and play opportunities. Policies DM 2 and DM13 relate to the provision of external amenity spaces to serve the private or in the case of flats, communal need of new residents. The NPPF states that planning decisions should plan positively for the provision of shared and recreational spaces acknowledging the importance of such spaces to the health and wellbeing of communities
442. The Anglia Square PGN includes within the vision the following statement ‘ the development will have, a clear relationship in built form with the surrounding area, and a safe and attractive public environment, including enhanced public spaces.’ In para 7.55 it is stated that these areas should consists of well-planned spaces which complement future uses with a landscaping scheme which integrates the site with the wider area, providing legible as well as green links. In para 7.56 two key priorities are identified for this site: firstly, the provision of an enhanced public realm which provides opportunities for local entertainment and socialising; and secondly, to re-connect this site with neighbouring areas, removing buildings which restrict permeability in order to improve access to neighbouring areas whilst creating new attractive and landscaped routes across the site.

Proposed public realm

443. The landscape strategy documents sets out the design approach and the analysis that has been undertaken which has influenced the landscape proposals. This analysis has included the appraisal of the site and its locality, a study of street typologies and a study of scale in the context of civic spaces. The resulting landscape design approach is based on the following four key objectives;
- Provision of two public squares, both with a strong sense of place

- Reinstatement of the north/south route extending St Georges Street north and the strengthening of the east/west link
 - Creation of four key arrival spaces
 - Enhancement of the perimeter environment
444. The public realm proposals form a detailed element of the hybrid application. The creation of two new public squares is central to the proposed scheme. A new reconfigured public square is proposed broadly in the same position as the existing shopping square. The existing square is rectangular in shape approximately 34 m x m 54m (including the colonnade space) and is dominated by a central large canopy which provides a covered seating area and activity space. The proposed square is broadly rectangular other than across the northern boundary. The Public Realm parameter plan indicates dimensions up to 33m x 46m for this space. A landscape scheme for this square includes hard and soft landscaping (including assent trees planting), seating and a new geometric canopy. The strategy envisages this square functioning as a community square, a space for shoppers and a space from which residents living in block A would access entrance lobbies. The strategy document illustrates how the canopy and the square could be used for a variety of uses, including pop-up markets and events. To the north of the square, views will be gained of St Augustine's Church and the spire of Norwich Cathedral. It is proposed that this square will be substantially delivered as part of phase 1 of the development.
445. A new square, described as St Georges Square is proposed to the west of Anglia Square. This is proposed as 'the civic heart' to the development and is intended to provide a focal point for the leisure uses. The Public Realm parameter plan indicated dimensions of up to 29m x 73m for this square. A landscape scheme for this square includes hard and soft landscaping, seating and a focal water feature.
446. Both squares are bisected by streets. The landscaping scheme details proposals for these 'connections', along with proposals for the adopted road frontages of the development. These car free spaces within the site are shown as public realm areas and would all include soft planting, feature paving, seating and a play trail. The play trail is described as consisting of *'non –prescriptive play items along two linear routes, beginning on the surface, rising up to furniture items and culminating in sculptural play features.'*
447. The tree planting strategy for the public realm areas includes the planting of feature and accent trees and within St Georges Square formal grids of box headed hornbeam. Cherry trees are also proposed across the development and the concept of a fruit grove has been adopted as a theme for the play trail. This is a response to the site analysis exercise which found the existence of a cherry grove on historic maps. Cherry Lane (within the site) derives its name from this source. The planting scheme extends across the highway frontages with street tree being proposed on Pitt Street, Edward Street and St Crispins Road.
448. A number of representations to the development have been critical of the form of development and the corresponding landscape strategy. Objections have raised a number of issues including, a: lack of greenspace; excessive use of hard surfaces; loss of the large canopy within Anglia Square and the loss of a community space which is both well used by the existing community and inclusive. Objections have also cited environmental concerns in terms of the over shadowing of the public

spaces and possible wind turbulence which could render the open spaces uninviting and unpleasant.

449. In terms of evaluating the proposed landscape strategy, a key consideration is the appropriateness of a public realm led approach over one which seeks to secure softer green spaces. Policy DM8 requires new residential development of this scale to provide publically accessible recreational space as an integrated part of the design. The accompanying SPD indicates that as a rule of thumb there is an expectation that not less than 20% of housing sites should comprise greenspace (defined as useable openspace and structural planting). However, the SPD also acknowledges that for high density flatted schemes and for development within city centres, alternative more urban design approaches may be more appropriate. In the case of this development, the site comprises a key element of a large district centre, is within the city centre and includes high density flats. The need to support an appropriate mix of uses through the creation of multi-functional spaces has a significant bearing on the landscape approach.
450. The inclusion of soft planting including tree planting, seating and the play trail are designed to optimise the function of the proposed public realm by create a series of interesting spaces through the site which will attract use by new residents, the existing community and visitors to the site. These public realm spaces account for 20% of the main site area.
451. The Daylight and Sunlight Report has assessed the sunlight to the proposed two public squares against BRE guidance. This guidance recommends that 50% of the public amenity areas should receive a minimum of two hours of sunlight on the 21st March. The report has assessed sunlight on 21 March and 21 June. On the 21 March, 19.33% of St Georges Square and 84.31% of Anglia Square would meet this criterion and on 21st June these levels increase to 89.88% and 95.43% respectively. The analysis demonstrates that the scale of development proposed around these two squares will result in overshadowing and in the case of St Georges Square this will be substantial at certain times of the day/year. However, St Georges Square is proposed to support the extended leisure function of the centre into the evening. The evening function of the square would not be comprised by the scale of the adjacent buildings. The submitted Wind Impact assessment demonstrates that in most modelled conditions, wind levels will be conducive to sitting, standing and walking. The main exception is a location in the southern sector of Anglia Square, in the lea of block J, where conditions may be uncomfortable for sitting when the wind is from due south. The proposed location of the canopy feature addresses this impact and provides a suitable seating shelter.
452. The council's landscape design manager has reviewed the landscape proposals and commented that overall the proposed landscape strategy provides the potential for the creation of a series of interesting public spaces which will have a richness of detail. She has highlighted that the success of the scheme will be dependent on careful detailing of both the hard and soft landscaping features and considers that there are further opportunities for additional planting to both strengthen the cherry grove theme and introduce further interest. She is supportive of the proposals for play which seek to use a variety of paving detailing to lead children through the site to bespoke furniture and/or sculptural pieces which will promote creative/playful interaction. In the event of planning permission being approved she has indicated that this concept will need to be further

developed and advised that the proposal provides positive opportunities for public art and play to be combined and for community engagement in the design process. The proposed water feature within St Georges Square and the canopy within Anglia Square are identified as positive elements of the scheme and provide distinction between the two squares, which are both considered sufficient in scale to accommodate a broad range of activities and uses.

453. The landscaping proposals on the road frontages of the site will augment tree planting across the site. Landscaping along New Botolph Street, Pitt Street and St Crispins Road is proposed to both enhance these road corridors and contribute towards mitigating local air quality conditions. The landscape proposals for these frontages include tree planting, wildflower planting and sections of green walling. The landscape and design manager has advised that multi-stemmed trees under planted with ground cover would be preferable along these frontages and that ground cover planting should be extended to areas presently shown as wildflower verges/meadows. This will avoid the need for tree pits, creates added landscape structure and increases nitrogen fixing.
454. Having regard to the details of the public realm strategy the landscape proposals respond positively to the Anglia Square PGN in terms of the provision of enhanced public squares. Furthermore in accordance with para 7.57 of the PGN the strategy encompasses green links, architectural greening and includes multi-functional public spaces which are clearly linked.

Proposed podium gardens

455. The residential podium gardens form part of the site wide landscape strategy and are proposed to ensure future residents, in accordance with DM2 and DM13, have access to external amenity space. Raised residential podium gardens are proposed to serve residents in blocks A, D, E/F, G/H and J. Collectively the gardens amount to an area of 10560sqm, 26% of the main site area.
456. Plans for block A indicate that the upper level garden areas will be laid out to include lawn areas, multi-stemmed trees and informal play areas. Podium gardens serving the other blocks would be considered at reserved matters stage. All gardens provide the scope for residents to gain elevated views either across the city or across the development. The daylight and sunlight analysis report demonstrates portions of these gardens will be significantly over shadowed. However, the spatial extent of these gardens will allow a scheme to be designed to include different zones suitable for different functions i.e. seating areas in the sunnier spots and planting in shadier areas with appropriate tolerant plant species. The Landscape Strategy describes the podium gardens as semi private amenity space for the residents to use and enjoy and which will include informal play opportunities, communal areas and more secluded seating. The images within the Landscape Strategy depict attractive high quality garden spaces. Subject to detailed landscape proposals being agreed for these spaces the communal gardens are capable of performing a valuable role for the resident population of each block. They not only provide outdoor space for sitting and play but opportunity for socialising, communal gardening and other activities. The Sustainable Community Strategy referred to in para.277 of the application should include these spaces and measures to promote their use as community assets.

Biodiversity enhancements

457. The landscape strategy includes details of proposed biodiversity enhancements. Phase 1 and phase II habitat surveys of the site indicate the existing site has a low nature conservation value. No protected habitats are present on the site and none of the trees were found to support bat roosts. The landscape strategy highlights that development provides an opportunity to enhance biodiversity and to help the site to be more resilient to climate change. DM3 states that where reasonably practicable, provision should be made within the development for new and enhanced green infrastructure which creates a biodiversity-rich environment and link new areas of habitat into the existing network of habitat.
458. The strategy sets out a number of measures including:
- New tree planting across the site
 - Formation of green routes through the site
 - Use of native tree, shrub and plant species with planting scheme
 - Use of elements of green walls on facades facing Edward Street, New Botolph Street and Pitt Street
 - Use of biodiverse green roofs
459. All these measures will be beneficial to biodiversity but the proposed inclusion of green roofs across the development is worthy of particular note. The proposed 'mansion' block form of development creates a substantial quantum of roof area. The landscape strategy indicates the use of green roofs across blocks A, D, E/F, G/H and J. Unlike the podium gardens, these roofs will not be publically accessible. Collectively the proposed area of green roof amounts to 13013 sqm (1.3hectares), equating to 32% of the main site area. The strategy indicates the scope for the creation of a mosaic of habitats, widening appeal to insects and birds. The council's ecology adviser has positively welcomed the use of large scale green roofs as part of this scheme. DM3 (para. 3.15) encourages the use of extensive wildlife friendly features on large scale schemes and this scheme would be the first city centre to incorporate green roofs at this scale.
460. The Ecology report includes additional recommendation in terms of the inclusion of both bat boxes and birds boxes across the development. The location and form of the development provides particular opportunities to support existing swift populations in the north of the city through the inclusion of integral swift boxes.
461. The proposed measures provide the scope to significantly enhance the biodiversity value of the site and extend the network of habitats in this part of the city, the site being well related to Gildencroft Park and the River Wensum corridor. It should be noted that although the design approach for the podium gardens is not wildlife led, the planting in these location will contribute to the site wide measures - these gardens in combination with the green roofs amount to 57% of the main site area. For a city development this constitutes a major environmental benefit. In the event of planning permission being approved conditions are recommended in relation to light, green roof provision, bird and bat box provision

Main issue 9 Amenity

462. Key policies and NPPF paragraphs – DM2, DM11, NPPF paragraphs 9 and 17.
463. Policy DM2 relates to a number of amenity considerations encompassing the impact of development proposals on those living or working adjacent to development sites as well as the level of amenity new occupiers will experience
464. The proposed height, massing and density of the development raises a number of amenity considerations. In particular these relate to overshadowing and internal light levels:
- (a) Extent of overshadowing resulting from the development and the impact on the amenity and working conditions of neighbouring residential properties and business
 - (b) Future internal light levels for future occupiers of the residential flats
 - (c) Future external sunlight levels to external amenity areas including private, shared communal and public areas.
- (a) Extent of overshadowing resulting from the development and the impact on the amenity and working conditions of neighbouring residential properties and business**
465. DM2 requires development to have regard to the prevention of overshadowing and loss of light and outlook and indicates that development will be permitted where it would not result in an unacceptable impact on the on the amenity of the area or the living or working conditions or operations of neighbouring occupants.
466. In terms of the main site, there is only one immediately adjoining building which does not form part of the managed shopping centre and this is the Desh supermarket located in the NE corner of the site. This two storey commercial building falls outside of the application boundary and is in third party ownership. This building currently forms part of the large mixed use block of development in this part of the site. The principal glazed frontage of this building fronts Magdalen Street, with the entrance doors and secondary windows facing Ann's Walk and Edward Street. Impact of the development on daylight levels is likely to be negligible given that the main glazed frontage face away from the development. It should be noted that the rear elevation of these premises is physically attached to structures proposed for demolition in phase 1 of the development. In the event of planning permission being approved it will be necessary for a condition to be imposed requiring full details of the demolition and remedial works.
467. Adjoining roads separate the main site from other surrounding buildings. Given the city centre location these buildings are numerous and include residential dwellings, office buildings and other retail and commercial premises. The application has been accompanied by a Daylight and Sunlight Report and Addendum (dated August 2018) which assesses the impact of the proposed development on these neighbouring buildings. The method of assessment has regard to BR209 Site Layout Planning for Daylight and Sunlight a Guide to Good Practice and BS8206-2. A number of methods have been used to assess the impact of the development: on daylight and sunlight– Vertical Sky Component (VSC), Average Daylight factor (ADF), No Sky Contour (NSC) and Annual

probable sunlight hours (APSH). Each method evaluates impact relative to a target value.

468. The Sunlight and Daylight Report considers impact on specified buildings on Edward Street, Magdalen Street, Golden Dog Lane, St Crispins Road Pitt Street, New Botolph Street, St Augustines Street, Duke Street and St Leonards Street. The report presents the findings of the assessment and identifies where and to what degree target values are not predicted to be met. These results predicts some loss of light to commercial properties to the west of Pitt Street, on New Botolph Street and offices on the southern side of St Crispins Road. Given the commercial use of these premises and impact of the development on these neighbouring businesses is considered acceptable.
469. In relation to the impact on residential properties, the results indicate that of the 43 windows assessed serving residential properties at 16-46 Leonard Street there would be some reduction in daylight to one window as a result of the proposed three-storey block of town houses proposed in this location. This level of impact is considered acceptable and the details of block B to be approved at reserved matters stage could further consider this relationship.
470. Results for Dalymond Court contained in the original report indicated a noticeable reduction in sunlight and daylight to windows in this residential block as a result of the development. This potential impact was raised with the applicant at an early stage in the consideration of the planning application and subsequently a further more detailed assessment was undertaken the results being presented in the supplementary Addendum (dated August 2018).
471. Dalymond Court comprises 2 x 4 storey apartment blocks. The two blocks totalling 24 flats are located tight against the adopted footway on the northern side of Edward Street. The main application site is located directly to the south of Edward Street. Within these two blocks twelve apartments have a living room located adjacent to the Edward Street frontage. The supplementary report includes an extended assessment of the whole of Dalymond Court development - assessing impact on 149 windows and 86 rooms.
472. The proposed development will result in a major change in height of development along Edward Street immediately opposite Dalymond Court. The northern sector of the site currently comprises surface level parking and the multi-storey car park which is set back from Edward Street and extends to a height of 27m. Block A will directly front Edward Street and step up in height from approx. 27m – 34.5m. Block D is proposed in the NW sector of the site and will extend to between 17.5-21m. The assessment results show that the reduction to both daylight and sunlight levels to a number of living and bedrooms in Dalymond Court as a result of this change will be noticeable and in some cases detrimental, having regard to target levels and the BRE guidance. In terms of results, in relation to the VSC test - 35 out of the 64 living rooms windows tested would fail to meet the target level. In respect of the 12 flats facing towards Edward Street, in terms of Daylight Distribution, the proposal causes detrimental loss of light to 7 bedrooms and 4 living /dining /kitchen rooms.. .
473. In assessing this impact there are a number of considerations. Firstly Dalymond Court currently faces south across a site which consists of open land used for surface level parking. From this 'baseline' any development which seeks to

establish a built frontage along the southern alignment of Edward Street would impact to some degree on sunlight and daylight to these residential blocks. Secondly the living rooms of Dalymond Court apartments have glazed windows providing access to external private verandahs/ balconies. The blocks are designed with neighbouring balconies stacked one above the other, providing a degree of cover/shading of the balcony below. This arrangement obstructs overhead light to living rooms increasing reliance on light from the direction of neighbouring land. Furthermore privacy screening which has been erected to enclose ground floor amenity space and the relative position of the two blocks to each other creates additional obstruction of light within the scheme itself. These factors increase the sensitivity of these blocks to development which may cause any additional over shading or light obstruction. To illustrate this point the supplementary Sunlight and Daylight addendum includes an assessment of the impact of four storey development on the application site which was subject to the 11/00160/F consent. The assessment demonstrates that this scale of development would result in 19 living room windows not achieving VSC target values and 8 not achieving APSH values. In the case of daylight distribution all living rooms would meet the target value

474. The applicant has investigated the affect two modifications to the proposed scheme would have on Dalymond Court. The options include 1) reduction in the floor plan of block A and 2) reduction in the height of the NW quadrant of block A. Both options also include a one storey reduction in the height of block D. For both options the daylight distribution results show substantially fewer living rooms would be affected and that the severity of reduction would be reduced. However, in both cases it is predicted that three living rooms and six bedrooms would continue to experience a reduction in daylight distribution by between 21-40%. The applicant has advised that development would not be viable if either of the proposed changes to block A were to be made, but the modification to block D does form part of the amended scheme. Policy DM 2 indicates that development which has an unacceptable impact on the living conditions of neighbouring occupiers will not be permitted. By causing loss of daylight and sunlight to living and bedroom windows the development will impact on the living conditions of neighbouring residents in Dalymond Court. Quality of outlook will also be affected. Impact is most pronounced on ground, first floor and second floor apartments with windows directly facing block A. In these cases the impact would be of a level which the BRE guidance would deem materially detrimental. This impact has to be considered in the context of most windows/room in Dalymond Court being shown to pass the assessment test. Furthermore the assessment has shown that given the design of Dalymond Court avoiding or minimising this impact would require a substantially reduced massing of development in this part of the site, a scale the applicant have indicated would render the whole scheme not viable. In this situation the level of harm has to be weighed against the wider regeneration benefits associated with the development of this brownfield site.

(b) *Future internal light levels for future occupiers of the residential flats*

475. The Daylight and Sunlight report also assesses future internal light levels in relation to flats within block A and the tower (full elements of the hybrid application). Three methods are used: ADF, DDR, APSH as indicators of predicted levels of daylight and sunlight for future occupiers.

476. The large proportions of block A along with the location of a multi-storey car park within the core of this building result in a relatively high proportion of single aspect flats. Approximately 76% of flats within block A have three internal walls and one external wall. This creates a high degree of thermal efficiency but dictates a layout in which bathrooms and kitchen areas are sited to the rear of units allowing scope for bedrooms and open plan living areas to all benefit from windows. With the exception of first floor flats and flats facing Magdalen Street, all proposed living rooms within block A have direct access to a balcony or private verandah. The proposed layout of the tower includes four flats on each floor – each flat occupying a corner position. All open plan living rooms within the tower have windows on two walls planes.
477. Within block A, daylight to a total of 827 habitable rooms has been assessed. More than 87% of rooms meet the ADF target value, 89% DDR target and 92% the APSH target. Across the development as a whole this suggests a good level of future amenity. However, considering living rooms in isolation there are a number of flats where predicted daylight levels for living rooms are below BRE target levels. These include single aspect units facing west (level 1-3), facing south (level 1-5), facing Magdalen Street (level 1), facing enclosed court yard (level 3-5) and inward facing court yard units (level 7). This effect is the result of a number of factors including; the predominance of single aspect flats, the obstruction caused by adjacent blocks or wings within the same block, and the blocking of overhead light by neighbouring projecting balconies. In relation to the latter, the block A sunlight analysis shows the impact of balconies on a sample of living rooms in terms of meeting ADF targets. With balconies, 19 of the 36 assessed living rooms fall below target values, without balconies all 36 pass. Therefore there is a balance to be made between optimising daylight to internal living rooms and the significant amenity value balconies offer.
478. In terms of the tower, a detailed sunlight and daylight assessment was carried out on the original tower design. This identified that a number of the single aspect flats at the lower level of the tower failed to achieve BRE target levels. The amended scheme addresses this through proposing four rather five units on each level providing scope for all living rooms to have two fenestrated wall planes.
479. In terms of the remaining blocks (submitted in outline) a detailed sunlight and daylight assessment has not been provided at this stage. The detailed internal layout and external appearance of these blocks will be subject to further reserved matters applications and detailed sunlight and daylight analysis will be required at that time to verify internal lighting conditions for individual residential units. However notwithstanding this, the outline application seeks consent for design parameters which relate to layout, massing and quantum and therefore it is necessary to assess whether these parameters will allow for a form of development in which future residents will experience satisfactory living conditions. Block A results act as a helpful evidence base to make such a judgement. Having regard to the factors influencing the internal light conditions within block A - it is likely :
1. Upper level dwellings and units facing Pitt Street, New Botolph Street and St Crispins have the scope to perform well in relation the BRE daylight and sunlight targets

2. Lower levels units fronting new St Georges Street are likely to perform less well relative to the targets – given the height and proximity of blocks aligning this route
 3. Inward facing single aspects units at the lowest levels of blocks E, F, G, F are likely to perform least well - given the relative height of the court yard spaces and the enclosing blocks
480. Based on the number of units within blocks E, F, G and H likely to fall into the above 3 categories, these blocks are unlikely to achieve comparable overall performance levels to block A. In particular the proposed configuration of blocks E/F and G/H creates court yard which are enclosed by tall facades increasing the scope for light obstruction and overshadowing. Light levels at the lowest levels of the court yard spaces within F and G are likely to be particularly constrained and sub-optimal. In these locations the detailed design and layout of residential units will need to have careful regard to optimising internal living conditions and balconies where they are considered feasible, will need to avoid unnecessary obstruction of overhead light.

(c) Future external sunlight levels to external amenity areas including private, shared communal and public

481. It is proposed to meet the needs of new residents for amenity space through the provision of private balconies/verandahs and communal residents gardens. The communal gardens created above the podium level of each of the multi-storey car parks collectively amount to over 0.81 hectares of external amenity space. In terms of evaluating the amenity value of this outdoor space the Sunlight and Daylight consultants have assessed the amount of sunlight each amenity could expect. BRE guidance has again been referred to and specifically the recommendation *that half of the area of an amenity space should receive two hours of sunlight on the 21st March*. When spaces are used all year round, the guidance indicates that this assessment date provides a representation of the likely general conditions. It adds that when spaces are likely to be used more selectively that a shadow plan should be produced for different times, including 21st June.
482. The results of the assessment indicate that in terms of the 21st March - amenity space within blocks A ad H would meet the BRE target whilst spaces within blocks E, F and G would fail. In the case of block F only 12% of the amenity space would receive the two hours of sunlight. On this summer date, 67% of the garden area within block F would receive two hours of sunlight and in the case of A, E, H and H the figure is higher between 83-97%. In order for the courtyard gardens to be used and function as valuable community assets, sunlight is important in bringing warmth and the sense of life and energy. Areas that are predominantly dark and chilly will not be welcoming and are unlikely to provide a level of amenity that is required for this high density scheme. However, the spatial extent of the proposed amenity space provides the scope for a highly varied landscape approach identifying different zones for different functions. This is discussed in Main issue 8 of the report..

Main issue 10 Transport

483. Key policies and NPPF paragraphs – JCS6, DM28, DM30, DM31, NPPF paragraphs 17 and 39.
484. The application proposes a significant level of new development within the northern city centre. Para 102 of the revised NPPF states '*significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.*' Policy DM28 in accordance with the NPPF encourages sustainable travel - requiring new development to incorporate; cycle and pedestrian links, maximise accessibility, appropriate and safe levels of parking level, travel planning and car club provision. The Anglia Square PGN recognises the potential the site offers for promoting sustainable travel and includes a development objective of both improved public transport facilities and enhanced opportunities for pedestrian and cycle movement through the site.
485. The location of the site at the northern fringe of the city centre affords a high degree of accessibility by all modes of travel, primarily by car, local bus routes, walking and cycling. The proximity of the site to; employment, shops, a wide range of facilities and services, as well as to transport hubs, creates the very best conditions for promoting sustainable travel behaviour by both future occupiers of and visitors to the development. Furthermore the comprehensive re-development of this site provides the opportunity for further improving access to this part of the city. The development of the shopping centre in the 1960/70s along with the construction of the inner ring road has resulted in poor connectivity with the city centre and adjacent local routes. Improved connections and better quality routes for pedestrians and cyclists would improve assist in addressing the harm caused by these historic schemes.

Proposed Access and movement strategy

Pedestrian and cycle access

486. The re-establishment of two primary historic routes passing through the site is identified in the Design and Access Statement as a master planning principle for the development. The development makes provision for substantially improved connections that will enhance pedestrian circulation and reconnect historic streets. Two primary routes are catered for. St George's Street is extended through the site with a connection to Edward Street on the desire line for pedestrian movement. This will exploit the new crossing that the council has installed as a replacement for the subway. A north-east to south-west route is provided roughly on former alignment of Botolph Street that will effectively re-establish a historic connection between St Augustine's and Magdalen Street.
487. It is proposed that all routes around the edge of the site on Pitt Street, Edward Street and Magdalen Street, will be improved and widened. On Magdalen Street the existing shopping centre building is canter levered over a section of footway creating a narrow and overbearing sense of enclosure. The proposed siting of block A will result in a widened footway in this location and the removal of the overhang will substantially enhance pedestrian experience. Improved pedestrian crossings are proposed on Edward Street and New Botolph Street and a new

unsignalised pedestrian crossing is proposed on Magdalen Street, south of flyover. These crossings will be beneficial to both pedestrians and cyclists.

488. Visitors, workers and residents travelling on foot or by bicycle will all access the development via these routes. All routes will be well lit and subject to passive and active surveillance.
489. The two primary routes through the site are proposed to be car free, access for servicing and emergency vehicles will be permitted but service access will be actively managed. Norfolk Constabulary has advised that physical measures will be required at the entrances to these routes (bollards/landscape planters) to prevent unauthorised access and mitigate the risk of hostile vehicle attack. The two routes will allow access for cyclists and new St Georges Street is intended to form part of the designated route of the Yellow Pedalway, connecting to the existing shared use facility on Edward Street. The proposal includes the widening of this route to the Esdelle Street junction. A shared pedestrian and cycle route is also proposed on Pitt Street. This would offer cyclists choice and an alternative route to new St Georges Street at times when that route may be busy with pedestrians.
490. Representations to the application have suggested that the proposed access strategy should include a greater degree of segregation, minimising conflict between pedestrians and cyclists. The local highway authority has advised that given the nature of the internal streets experience across the city, it is unrealistic to expect that pedestrians and cyclists would respect segregated facilities and therefore shared use facilities are appropriate. They consider the proposed approach is acceptable and consistent with the rest of the city centre.
491. Public cycle parking spaces are proposed in visible locations within the development, secure stores for residents' bikes will be co-located with residential lobbies and secure staff parking within each commercial block.
492. Proposed cycle parking levels are described in detail in the description of development table. A total of 1372 residential parking spaces are proposed – just above a 1:1 ratio. With reference to DM31 this is below the 1781 spaces required for the mix of 1 and 2 bed dwellings proposed. However, the local highway authority has indicated that they do not object to this level of provision. The communal cycle stores will allow spaces to be used more efficiently, with any spare capacity created by non-bike owners being taken up by flats owners with more than one bike. 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.
493. A plan has been submitted indicating public cycle parking across the site. The local highway authority has confirmed that the locations shown are acceptable but additional provision will be required in order to ensure that an adequate number of spaces are available within the two squares. This would be addressed through a planning condition in the event of planning permission being approved.

Public transport

494. There are a total of 11 bus stops within an 8 minute walk of the site serving 16 bus routes. These provide connections to a variety of destinations. The park and ride

services between Thickthorn - Norwich airport and Postwick - Sprowston all stop at Anglia Square. As part of the development proposals, a bus layby for southbound buses is proposed on Magdalen Street. This would reduce the propensity for buses blocking the bus lane when passengers alight and also facilitate the relocation of the existing 'Edward Street bus stop to Magdalen Street. the number of bus passenger trips generated by the proposed development is anticipated to be accommodated within the existing services.

Vehicular access and parking

495. In terms of vehicular access the description of development table sets out proposed vehicular access arrangements and proposed car parking levels for the residents and members of the public.
496. The proposed multi-storey car park (MSCP) in block A provides 600 public decked parking spaces. This replaces existing public and commercial parking provision within the site. The Transport Assessment confirms the existing site parking capacity totals 1192 parking spaces, although since the closure of the MSCP only around 599 are operational. The former NCCAAP policy (LU2) envisaged the future rationalisation of parking in this location and allowed for a replacement MSCP. Current adopted policy (DM29) is permissive of new public off street parking where it replaces and consolidates existing provision: provides efficient, high capacity parking; and where it improves the balance and distribution of car parking within the city centre. The proposed MSCP meets these key criteria. The number of spaces will exceed the Local Plan cap of 10,000 spaces by 230 spaces. However, it is expected that other public car parks in the city centre with temporary planning consents will expire before the new Anglia Square multi storey car park is operational. In addition in accordance with DM29, provision is proposed for Electric Vehicle Charging Points (EVCP), for accessible spaces and for Variable Message Signing (VMS) to advise motorists of the availability of spaces beyond the development site. In the event of planning permission being approved it is recommended that these matters are secured by condition, along with a car park tariff which discourages the use of the MSCP by commuters. The proposed access to the MSCP from Edward Street is considered satisfactory
497. The residential parking strategy is set out in the description of development table. In total 910 parking spaces are proposed to serve the 1209-1250 dwellings. Depending on the final dwelling number, this equates to a parking ratio of between 0.72 – 0.75 spaces per unit. The applicant cites this level as comparable with other city centre consented schemes Policy DM31 states that in this location ('Elsewhere in the City centre parking area) car free parking is permitted and sets a maximum permitted parking ratio of one space per dwelling.
498. Residential car parking levels lower than what is proposed would be acceptable and indeed be preferable on this site. However, the applicants have indicated that residential values in Norwich remain aligned with parking provision and not offering the option of purchasing a space would impose a risk that either sales would be slow and/or the values necessary to make the scheme viable would not be achieved. The proposed 0.75 ratio is just below average car ownership for the surrounding area of 0.8 cars per household (2011 Census) and a level the applicant considers necessary to make the development viable. The applicants have agreed to monitor the uptake of parking in the initial phases (residential parking spaces will be sold separately to flats) and to reduce provision in later

stages if the market indicates strong interest in zero car living. Furthermore, in accordance with DM31/32 development of this scale is required to fund the provision of car club spaces. In this case seven car club vehicles are proposed, provided on a phased basis as development progresses. The local highway authority has indicated that a minimum of two spaces should be available prior to the first occupation of phase 1 and that marketing material should reference local car club provision along with on-site cycle parking facilities. This will ensure that home purchasers are aware of travel options when making a decision as to whether to buy a car parking space. This would be secured via a residential travel plan

499. In addition it should also be noted that 2011 Census data indicates that 56.4% of existing residents living in the vicinity of the site use sustainable modes of travel to and from their place of work compared to the average national rate of 32.3%. Most existing residents in this part of the city choose to walk. It is therefore not necessarily the case that car owners living in this new development will use their car on a regular basis since it would often be preferable to travel to other destinations within the city by other means. In addition the local highways officer has advised that monitoring of car trips associated with other city centre flatted schemes in Norwich, undertaken to inform the Transport Assessment, recorded very low AM and PM car movement figures. The TA submitted with this application predicts the impact of car movements associated with the proposed residential development will be low and well below traffic which would have been associated with the previous consented schemes for a large super market on this site.
500. Provision for electric vehicle charging points is proposed within each of the residential decked car parks. This is set out in the description of development table and includes provision for both private EVCP points and communal fast charging facilities.
501. Having regard to the residential trip data, the EVCP and car club provision and the applicants' commitment to the review of parking levels in later phases the total number of residential spaces is considered acceptable.

Traffic impact

502. The Transport Assessment (TA) submitted with the application sets out the traffic generation, distribution and the impact of the development. The assessment has been carried out in accordance with the advice provided by the strategic highway authority .Traffic figures associated with the phase 1 in 2020 and the fully operational development in 2028 have been derived and the impact this traffic on the operation of 10 junctions within the vicinity of the site has been modelled.
503. The assessment includes consideration of the impact of proposed servicing arrangements which are set out in description of development table.
504. A summary of predicted vehicular trip generation in 2028 is set out below. The TA states that the full regeneration of Anglia Square will have a minor impact on the operation of the surrounding highway network in the anticipated year of opening of Phase 1 and on completion for the full development in 2028.

| Land use | Week day AM peak | Week day PM peak | Saturday Peak |
|-------------------|------------------|------------------|---------------|
| Residential | 198 | 221 | 129 |
| Non - residential | 238 | 506 | 640 |

505. The local highway authority has stated that based on the submitted Transport Assessment and Addendum it is accepted that the proposed development would not have a severe traffic impact on the Norwich strategic highway network and major changes to roads and junction are not justified. They confirm the development has been assessed using the current Norfolk County Council (NDR) traffic model that includes planned growth in Greater Norwich and expected national traffic projections and effects of the Broadland Northway (Norwich Distributor Road) on the city's highway network. The submitted Transport Assessment for the Anglia Square development is therefore considered robust and has properly assessed the impacts of the development for all forms of transport.
506. The County Highway Authority have confirmed that *'whilst the development is adjacent to the strategic highway network, the traffic impact on the network will be minimal due mainly to reduced parking provision for the residential element of the scheme and the presence of a travel plan as well as its proximity to local facilities'*. The application includes a draft residential travel plan and for the first time a draft commercial travel plan for the site. These plans have targets and measures to help to reduce car traffic and promote sustainable travel. Overall the travel plans are satisfactory, however given the unique accessibility of the site by Norwich Park and Ride services more emphasis should be made to encourage travel by this mode in the commercial plan.

Construction Phase

507. The highway authority has indicated that during the demolition and construction phases it will be imperative that traffic generation (likely to be primarily contractor parking and trucks) is managed as outlined in the submitted draft Construction management plan. The highway authority has also recommended that prior to development commencing a suitable risk assessment will need to be undertaken by the developers to ensure necessary measures are in place, such as specific cycle awareness training for truck drivers
508. On the basis of the above the highway authorities have confirmed that they are satisfied that the highway impacts of the development are adequately mitigated so far as not to adversely affect the local road network by the promotion of travel by walking, cycling, car club and by bus as an alternative to the private car. In accordance with the NPPF the development make appropriate opportunities to promote sustainable travel modes; makes provision for safe and suitable access and proposes suitable measures to mitigate the impact of the development on the transport network. In the event of planning permission being approved it is recommended that planning conditions be imposed to relating to: Construction Management Plans, off-site highway works, submission/agreement and implementation of travel plans; monitoring arrangement for car and cycle parking; cycle parking provision; EVCP provision and arrangements relating to the

operation of the MSCP. Matters relating to car club and public access rights through the site will need to be secured through a S106 Obligation.

Main issue 11 Air quality

509. Key policies and NPPF paragraphs – JCS1, DM11, NPPF paragraphs 103, 181
510. The proposed development site lies within the Air Quality Management Area (AQMA) for NO₂ declared by Norwich City Council in 2012. DM11 requires development which is likely to have an impact on air quality to take particular account of the air quality action plan for that area.
511. The Anglia Square PGN states in para 7.47 that proposals for the site should be accompanied by an Air Quality Assessment which will assess the potential impact of the development and will set out appropriate mitigation measures which could include green walls, trees and landscaping, a reduction in traffic generation and maximise opportunities for residents not to use the private car, to ensure an appropriate standard of amenity.
512. The northern boundary of the AQMA is defined by the inner ring road but extends out to include the St Augustine's area where the canyon effect of the buildings on the edge of the street and heavy traffic loading has resulted in exceedances of the annual mean air quality objective for NO₂ of 40 micro grammes/cubic metre of air (µg/m³). The Environment Act 1995 imposes a statutory duty on Local Authorities to review and assess the air quality and where an AQMA has been declared to produce and implement an Action Plan to reduce local levels of the specified pollutant in the area.
513. This application proposes a significant quantum of development within the AQMA and for this reason, air quality as a potential significant environmental impact is a matter considered within the ES. The air quality chapter in the ES is informed by two Air Quality Assessments (AQAs) (Version 1 and 2). Version two was submitted in September 2018 and includes a detailed response to matters and questions raised by the city council's environmental protection officer.
514. Table 1 below presents the national air quality objective levels for NO₂ and particulate matter of >10 µg, both of which represent statutory target levels. The annual mean objectives apply at locations where members of the public might be regularly exposed such as building façades of residential properties, they do not apply at the building façades of offices or other places of work, where members of the public do not have regular access. The NO₂ hourly objective is applicable to all locations where members of the public could reasonably be expected to spend that amount of time. Diffusion tubes do not provide information on hourly exceedances, but research identifies a relationship between the annual and 1 hour mean objective such that exceedances of the latter are considered unlikely where the annual mean is below 60 µg/m³.

| Pollutant | Air Quality Objective | |
|--|---|--------------|
| | Concentration | Measured as |
| Nitrogen Dioxide (NO ₂) | 200 µg/m ³ not to be exceeded more than 18 times a year | 1-hour mean |
| | 40 µg/m ³ | Annual mean |
| Particulate Matter (PM ₁₀) | 50 µg/m ³ , not to be exceeded more than 35 times a year | 24-hour mean |
| | 40 µg/m ³ | Annual mean |

515. In terms of the proposed development the main considerations are:

- What is the likely impact of the development (construction and operation) on air quality in this part of the AQMA i.e how will the development impact on pollutant concentrations and compliance or exceedance of statutory targets;
- What implications do the AQA findings have for the development and for this part of the AQM;.
- Whether the development has had sufficient regard to the Air Quality Action Plan in the scope of the mitigation measures proposed.

516. The submitted AQAs assess both NO₂ and PM₁₀ in the context of the statutory target levels. The approach entails establishing air quality conditions in 2017, forecasting conditions in 2028 without development on the site and assessing the impact of the proposed development relative to this baseline. NO₂ pollutant concentrations have been predicted using ADMS-Roads software which is able to provide an estimate of air quality both before and after development and at varying heights above street level. The model takes into account data such as background pollutant concentrations, meteorological data, traffic flows, percentage heavy goods vehicles, street canyons, traffic queueing and on-site energy generation. The modelling makes no allowance for potential reduction in emissions associated with future changes in car, HGV or buses engine technology or fuel type over that period. In addition in this case, the 'without development scenario' does not include an allowance for the existing vacant buildings (multi-storey car park) and office space being brought back into use – this would result in a greater baseline traffic level.

517. The table below shows predicted annual mean concentrations of NO₂ at ground floor and first floor locations at nine identified frontages across the proposed development. Locations expected to exceed the annual mean objective of 40 µg/m³ have been highlighted. The table shows the predicted increase in NO₂ levels both with and without the development.

Table 3: Predicted NO₂ Levels With & Without Development

| Receptor Location & Position in Proposed Dev. | Floor Level | Annual Mean NO ₂ Concentration µg/m ³ | | | |
|---|-------------|---|------------------|---------------|--|
| | | Base Year - 2017 | 2028 Without Dev | 2028 With Dev | Predicted NO ₂ change With/ Without Dev |
| A. Edward St - Block A north | 0 | 50.4 | 50.4 | 50.6 | 0.2 |
| | 1 | 32.7 | 32.5 | 33.1 | 0.5 |
| B. Magdalen St - Block A east | 0 | 62.8 | 62 | 63.4 | 1.4 |
| | 1 | 33.2 | 32.9 | 34.1 | 1.2 |
| C. St Crispin's - Block J south | 0 | 29.9 | 29.8 | 29.4 | - 0.1 |
| | 1 | 28 | 27.8 | 28 | 0.2 |
| D. St Crispin's - Block G south | 0 | 29.1 | 31.2 | 32.1 | 0.9 |
| | 1 | 27.8 | 28.3 | 29.1 | 0.8 |
| E. St Crispin's roundabout -Block F southeast | 0 | 37.8 | 49.1 | 50.5 | 1.4 |
| | 1 | 32 | 32.6 | 33.5 | 0.9 |
| F. Pitt St/ New Botolph St Junc. Block E north east | 0 | 47.8 | 47.9 | 51.4 | 3.6 |
| | 1 | 29.3 | 29.4 | 30.7 | 1.4 |
| G. New Botolph St/ Edward St intersection Block D north | 0 | 67.1 | 67.1 | 70.6 | 3.5 |
| | 1 | 33.1 | 33 | 34.4 | 1.4 |
| H. New Botolph St/ Edward St intersection Block B east | 0 | 56 | 56 | 59 | 3.1 |
| | 1 | 32.5 | 32.4 | 33.8 | 0.9 |
| I. Block B north | 0 | 28.4 | 28.3 | 29.6 | 1.3 |
| | 1 | 26.8 | 26.8 | 27.8 | 1 |

518. In terms of the likely impact of the development on air quality in this part of the AQMA the modelling indicates the following:

- The modelling predicts that in all locations (with the exception of location C) the development (2028) will lead to an increase in NO₂ concentrations - the level of increase varying between 0.2 – 3.6 µg/m³. The Environmental Protection UK Air Quality Guidance document attempts to quantify the impact

a development may have on air quality. Applying this guidance to ground floor (0), the impact of the development is considered to be 'substantial' at ground floor locations B, E, F, G & H and 'negligible'-'minor' at first floor level. In location E where 2017 levels are $37.8\mu\text{g}/\text{m}^3$, the annual NO_2 target is predicted to be exceeded in both the 'with' and 'without' 2028 development scenarios.

- The modelling predicts that in ground floor locations B and G the hourly NO_2 target level will be exceeded and in location H, the level will be close to exceedance. The 3 month monitoring undertaken in 2017 suggests that the hourly target is exceeded in the 2017 base year but in both cases the predicted level of exceedance is increased 'with' development. In locations where emissions are above $60\mu\text{g}/\text{m}^3$ exposure for a period longer than one hour would raise public health concerns.
- Construction phase - a range of mitigation measures will be required during the construction phase to limit the impact of particulates and construction traffic on local air quality. These will include solid screens or barriers; ensure all vehicles switch off engines when stationary – no idling vehicles; avoid the use of diesel or petrol powered generators and use mains electricity or battery powered equipment where practicable, ensure an adequate water supply on the site for effective dust/particulate matter suppression/mitigation
- PM_{10} was also modelled but no breach of the air quality objective for particulates PM_{10} was predicted.

519. Before considering these findings further it is important to understand that any redevelopment of Anglia Square, including the bringing back into use of the existing office buildings and multi storey car park, would increase NO_2 levels above 2017 baseline levels. The lack of built frontages onto Edward Street and New Botolph Street and the comparatively low levels of activity/traffic levels associated with the underutilised site (i.e. unused offices and MSCP) suppress existing NO_2 levels in the area. Any comprehensive development project for this site will therefore lead to deterioration in local air quality conditions to some degree. Furthermore although the council's environmental protection officer has confirmed that the methodology adopted and hence the findings concluded are robust she has confirmed that they represent a worst case scenario. This is on the basis of the factors already referred to in para.516 and also due to the approach of selecting air quality monitoring positions and receptor locations to identify potential 'hotspots'. The benefit of this approach is that it allows potential mitigation to be specified having regard to worst case scenario conditions. In terms of considering the significance of the predicted air quality conditions for the development. The development on the main site includes a substantial quantum of residential properties ('sensitive' receptors). These are all located at first floor level and above, where pollutant levels are predicted to be below the annual statutory target. A mix of commercial and 'back of house' functions, including entrance lobbies, bike stores and bin stores are proposed at ground floor level on the main frontages of the development facing the surrounding road network. These uses are not defined as 'sensitive' and as such are suitable at ground floor level without the need for mitigation. However, the applicant has advised that all commercial accommodation (including units fronting Pitt Street, New Botolph Street and Edward Street) will have mechanical ventilation associated with air source heat pumps.

520. Ground floor residential dwellings in block B would be subject to conditions in which the annual and daily statutory targets are predicted to be exceeded. The detailed design of this block (at reserved matters stage) would need to address this constraint and it may be preferable for ground floor units to face into the site. Suitable mechanical ventilation or individual whole house ventilation systems with NO_x/NO₂ filters are also likely to be required.
521. In locations where exceedance of the hourly NO₂ level is predicted, there is the risk that the development could give rise to a wider detrimental public health impact. Elevated levels of NO₂ are predicted on Pitt Street, New Botolph Street, Edward Street and Magdalen Street are associated with general high traffic levels, queuing at junctions and idling of heavy goods vehicles particularly buses. However, the principle function of these routes is 'movement' and as such exposure time for pedestrians and cyclists is very likely to be well below one hour, above which levels > 60 µg/m³ become a particular concern. The proposed landscape strategy proposes planting along all these road frontages and this will have a beneficial effect. On Pitt Street, New Botolph Street and Edward Street a combination of tree planting, soft buffer planting and green walls are proposed. This landscape approach provides scope for the planting to be designed and specified in a manner to assist local absorption of NO₂. This mitigation, along with the enhanced traffic free through routes across the site, offers potential for improved conditions for pedestrians and cyclists along with existing residential properties located close to the road network.
522. Outdoor amenity and public spaces are proposed at both street level (public squares) and at elevated levels (residents' communal gardens and private balconies). These are designed to encourage people to dwell and therefore at these specific locations exposure times may exceed 1 hour. Apart from private balconies on boundaries facing outwards of the site, these spaces are set away from highway boundaries and are shielded by adjacent buildings. In the case of balconies and communal gardens these are raised above road level. The council's environment health officer is satisfied that pollutant concentrations in these locations will not exceed relevant statutory targets.
523. DM11 requires development to take particular account of the air quality action plan for that area. Given existing statutory target exceedances it is necessary to consider whether the development has had sufficient regard to the AQAP in the design of the scheme and the scope of the mitigation measures proposed. The council's environmental protection officer EPO has recommended mitigation measures should be considered to minimise traffic congestion, encourage the use of non-polluting modes of travel and ensure adequate number of rapid electric charging points are installed. The proposed access strategy is set out in the description of development table and considered in more detail in Main issue 10 of the report.
524. In summary the environmental information in relation to air quality has been assessed. The predictions have taken into account the cumulative impact of other planned development and for the reasons outlined are considered to represent a worst case scenario. The re-development of this site is identified as a strategic priority in the JCS and measures have been included in the design of the scheme to suppress traffic generation associated with this development. Locating new housing in sustainable locations is central to reducing the reliance of the growing population on private car travel. This site is a highly sustainable brownfield site

and a full range of measures have been proposed by the developers to promote sustainable travel behaviour by residents, visitors and works and limit the impact of additional traffic on air quality.

525. In accordance with DM11 in the event of planning permission being approved it is recommended that the following mitigation is secured through imposition of planning condition: adoption and implementation of Environmental Management Plan; NO₂ levels to be subject to further monitoring prior to each phase –allowing mitigation measures to be prescribed having regard to verified levels; adoption and implementation of residential and commercial travel plans, EVCP provision and landscaping of Edward Street, New Botolph Street and Pitt Street frontages.

Other Matters

Noise

526. Key policies and NPPF paragraphs – DM3, DM11 NPPF paragraphs 170 and 181.
527. Policy DM2 seeks to ensure that future occupiers of developments will have adequate protection from noise and to protect the amenities of existing occupants in the vicinity of the site from unacceptable noise disturbance.
528. An Environmental Noise Assessment (ENA) has been undertaken in relation to the proposed development and this has informed the Noise section of the Environmental Statement. The purpose of an ENA is to ascertain the existing noise environment within which a proposed development is located. The assessment includes the undertaking of measurements from different areas of the site over a minimum of 24 hours, so as to review both existing daytime and night-time noise levels. Once measurements have been retrieved, the primary source of noise is identified, which in the instance of Anglia Square is road traffic noise, in particular vehicles movements on St Crispins Road. The assessment considers the potentials impact of noise from the primary source on residents and what mitigation may be required for recognized UK standards/ guidance to be met. In addition the assessment considers noise generation during the construction phase.
529. On the basis of the noise findings, the ENA recommends that the proposed dwellings be fitted with windows with an acoustic reduction value of R_w+C_{tr} 32dB. It is indicated that this mitigation measure will be sufficient to achieve WHO internal noise levels of 30dB at night and 35dB during the daytime across the development. The ENA indicates that this level of noise reduction can be achieved with a typical double glazing configuration of 10mm/6-16mm/6mm. It is further recommended that acoustically treated trickle vents with an acoustic reduction value of R_w+C_{tr} 32dB will be needed for the habitable rooms. It is stated that with these measures in place the internal noise requirements set out within BS8233:2014 will be achieved, thus affording protection from noise and protecting the health and well-being of future residents of the development. On this basis the ES quantifies the impact on future residents of the development from noise to be 'negligible'. In making this judgement it is indicated that account has been taken of the of the cumulative effect of the development along with other committed developments in the area.

530. In terms of the construction phase, the ENA refers to a range of measures designed to minimise noise and vibration, including selection of plant and working methods, controlled working hours, enforcement of noise and vibration limits, boundary fencing and noise monitoring. The ENA recommends that these measures should be detailed in a Construction and Environmental Management Plan (CEMP) which would be agreed with the council prior to the commencement of the development. The ENA confirms that during the construction phase noise levels will be in excess of existing baseline levels. On this basis the ES quantified the impact on the surroundings as 'minor adverse' but medium term and of minor significance.
531. The council's environmental protection officer (EPO) has reviewed the ENA and during the course of his assessment sought additional clarification on a number of matters. These include clarification over 1) the locations used to establish existing noise levels conditions 2) details of future external plant and machinery and 3) further information in relation to the use of the 'leisure' square.
532. In relation to 1), the noise data collected as a result of on-site monitoring is important in determining the need for and level of noise mitigation. In this case the EPO queried whether the proposed glazing specification (one type) will be sufficient to achieve the target WHO internal standards in all dwellings, given the likely variation in the noise environment across the development as a whole. Having received additional information he has advised that in most cases (including the whole of block A) the glazing specification will be acceptable but that certain parts of the scheme may require a higher degree of noise protection – in particular ground floor dwellings on Edward Street and lower level residential dwellings on Pitt Street/New Botolph Street and St Crispins Road, where traffic noise levels are greatest. In making this comment the EPO has had regard to both existing site conditions and recent noise levels measured on adjacent site frontages (St Marys Works). The EPO therefore advises that each reserve matters application should include additional noise monitoring to verify noise mitigation requirements for each part of the scheme.
533. In relation to plant, machinery and other equipment, the submitted plans indicate both internal rooms and roof top locations for this function. In a number of locations roof top plant is shown in the vicinity of proposed residential units. Given the planning stage of the development the applicant has confirmed that the full requirements for plant, extraction and other equipment has yet to be specified. However, to limit noise the ENS indicates these features will be designed and specified to achieve noise levels 5db below existing background. The council's EHO has confirmed that a planning condition requiring submission of plant details along with a demonstration that these noise levels will be achieved, would satisfactorily safeguard residents against noise from this source.
534. In relation to the leisure square, the EHO has advised that the primary source of noise for future residents will be from the people and activity rather than from traffic. Blocks E/F and G/H include low level residential flats which will be in close proximity to café, bars/restaurants and the leisure square, all in use during the daytime and evening. These blocks form part of the outline element of the application and therefore limited information is available to the EPO at this stage. In terms of managing the impact of noise associated with leisure uses, the site falls outside the designated Late Night Activity Zone and therefore hours restrictions would be justified to limit evening use (opening hours 07:00 – 00:00).

Furthermore given the proposed number of new residents likely to be living within the centre it will also be necessary to manage noise levels associated with external amplified music and other forms of entertainment, as well as ensuring that noise breakout and/or transmission from commercial units is appropriately controlled. Notwithstanding such controls it may additionally be necessary for flats located closest to these noise sources to include additional noise protection measures. The EPO therefore advises that each reserve matters application should include detailed consideration of noise associated with the leisure use of the site in order to ensure that appropriate noise mitigation measures can be secured. Furthermore he recommends that a planning condition be imposed requiring the submission and agreement of a Anglia Square Public Space Plan which would detail management arrangements for the use of these external areas.

535. Subject to the conditions: referred to in the above paragraphs; hours restriction in relation to servicing and the requirement for a CEMP the EPO confirms that in accordance with DM11, noise associated with the construction and operation of the development will be satisfactorily mitigated and will not have a significant environmental effect.

Wind turbulence

536. The application documents include a Wind Assessment which considers the impact of the proposed development on local wind turbulence. Wind analysis is conducted on proposed developments which include tall buildings and/or groups of buildings where narrowing corridors are created. Under these conditions low pressure areas can be created leading to accelerated wind speeds. In addition development which includes buildings with expansive facades can also lead to wind related issues. In extreme cases these buildings can create areas of discomfort for pedestrians or even hazardous conditions for vulnerable persons such as the elderly or cyclists at ground level
537. The assessment has regard to wind speed thresholds conducive to sitting (0-4m/s) standing (4-6m/s) and strolling (6-8m/s). The wind speed results, generated by a 3D Computational Fluid Dynamics model are then compared against these thresholds and images are generated displaying predicted ground level conditions (associated with various wind directions). Wind data is based on maximum monthly average wind speeds (February and March when wind speeds are generally highest). The generated images allow for locations likely to experience higher wind speeds to be identified and a judgement to be made regarding comfort levels for various activities.
538. The main findings of the assessment include;
- The ground floor results show that areas inside the development are mostly suitable for sitting and strolling whilst the greatest affected areas are around the outside facades of the development to the south and north-west where wind speeds could at times be uncomfortable for sitting and standing, i.e. greater than 6m/s. These breezier locations correspond to the Pitt Street, New Botolph Street and the southern entrance point to development (around the new St Crispins pedestrian crossing). Activity in these locations is likely to be dominated by pedestrian movements and the predicted conditions do not raise safety concerns (i.e. below 8m/s).

- Within the development it is predicted that a section of the new Anglia Square public square (southern sector) would be susceptible to velocities between 6-8m/s when wind is from the south. The proposed canopy would offer appropriate shelter for seating. Pockets of higher wind velocities (6-8m/s) are also predicted in certain wind conditions around the base of the tower, the position of seating within St Georges Square will need to have regard to this result.
- The upper level garden terraces. The modelling shows that for the interior of the development all terraces fall within the standing comfort level for principle wind directions in all but one location (block A central terrace), with the majority also falling within the comfort category for sitting. However closer to the terrace edges, especially in windward sides, higher wind speeds will be experienced. The report recommends greater consideration is given to these factors when planning the balustrade details. Block E/F terraces are the most susceptible to higher and potentially more unacceptable wind velocities. To mitigate the possibility of occupant discomfort, the report recommends taller parapet walls and balustrades.
- Tower balcony results show that the recessed and inset corner balconies results in acceptable conditions for sitting and standing in all wind directions. The balconies are shielded laterally and in height by the balustrades and the volume inside functions as a deflecting shield.
- Lower block balcony results: the southern side of Block F is identified as being susceptible to the highest wind speeds across the whole development. The report recommends that glass or chevron style balustrades or similar more disruptive profile balustrades should be utilised for balconies above 10m as these provided more sheltering. Measured wind speed data shows that for 40% of the year occupants with balconies above 10m would find their balconies uncomfortable. The report therefore advises that a slightly taller wind facing chevron balustrade would improve wind micro climate on all downwind balconies. For balconies below 10m or in the most sheltered areas spindle type balustrades were considered acceptable.

539. The council's environmental protection officer has reviewed the wind assessment and advised that the methodology and conclusions contained in the report are sufficiently robust to establish that the development will not result in adverse conditions at street level or for residents using upper level balconies and roof gardens

Energy and water

540. Key policies and NPPF paragraphs – JCS3, DM1, NPPF paragraphs 148-154.

541. Policy 3 of the Joint Core Strategy aims to minimise reliance on non-renewable high-carbon energy sources and maximise the use of decentralised and renewable or low-carbon energy sources and sustainable construction technologies. For development of this scale the JCS requires that at least 10% of the schemes energy requirements are delivered via decentralised and renewable or low-carbon sources and a demonstration that such provision has been maximised. The AS PGN referenced JCS requirements as well as referring to the

contribution that adopting efficient building construction can have in reducing energy requirements and reducing carbon emissions.

542. Para. 148 of the NPPF states that the planning system should support the transition to a low carbon future and help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.
543. An Energy Statement (EnS) has been submitted with the application. The EnS outlines a 3 step strategy - Be Lean, Be Clean and Be Green.
- Be Lean - Fabric first approach: Energy demand of the development will be optimised and minimalised to exceed the requirements of the Building Regulations. Energy efficiency measures for the residential units will achieve a 11.63% reduction in energy demand and 8.00% reduction in CO₂ when assessed against the 2013 Building Regulations. These measures will include the use of construction materials selected for their thermal performance.
 - Be Clean - Supply energy efficiently: Installation of energy efficient gas fired combination boilers to each apartment to provide heat for space heating and the generation of domestic hot water. By utilising additional controls in the form of additional room thermostats controlling the radiators together with TVR's additional efficiencies can be obtained further reducing the required energy input and CO₂ emissions. The EnS indicated that all the new dwellings will meet a thermal efficiency rating of B and energy bills will be of an affordable magnitude.
 - Be Green - The feasibility study demonstrates that the use of air source heat pumps (ASHPs) is considered the most feasible option for the retail and commercial space including the hotel and cinema. By using ASHP's for non-residential heating and cooling, 18% of the required energy for the whole development in kWh will be delivered by renewable technology. Provision has been made for the ASHP plant to be located around the periphery of the lower levels of the central car parks. The use of renewable technology can be clearly defined within the lease agreements of incoming tenants, securing its inclusion within the proposed scheme.
544. The EnS includes an appraisal of the technical, physical and financial feasibility of the use of other low and zero carbon (LZC) systems on the project including: photovoltaics, solar thermal, ground source heat pumps, biomass heating systems, wind turbines and gas fired combined heat and power (CHP). All are dismissed on a variety of grounds including the constraints imposed by the site and by the built form of the proposed development. In the case of CHP, technical issues relating to the energy demand profile of the proposed commercial: residential mix, is cited along with the cost of installing site wide infrastructure which would make this option unviable. The EnS therefore concludes that the proposed strategy for ASHP technology within the commercial component of the scheme is the preferable and most suitable approach, being able to meet the performance requirements of such spaces and providing opportunity for both heating and cooling.

545. In terms of JCS 3 the use of ASHPs, specifically within the commercial component of the scheme, results in the minimum 10% for the whole development being exceeded. Proportionally the commercial uses have a more significant daily energy demand than the residential element of the scheme. Although a site wide renewable strategy would be preferable for a scheme of this scale the cumulative effect of the Be Lean, Be Clean and Be Green Energy approach indicates an energy reduction over the estimated baseline figures of 23%.

Archaeology

DM Key policies and NPPF paragraphs – DM9, NPPF paragraphs 184-202

546. The planning application is supported by an Environmental Statement chapter on Archaeology and includes an Archaeological Assessment. It indicates that the proposed development site has a high potential to contain heritage assets with archaeological interest (buried archaeological remains) of local and regional significance. These include potential for evidence of Anglo-Saxon and later settlement, the Anglo-Saxon defensive ditch and the remains of St Olave's Church and St Botolph's Church and their associated burial grounds.
547. The original plans for the Anglia Square development have been consulted at the Norfolk Record Office and the depth information integrated into the revised Archaeological Assessment. This indicates that the depth of impact from previous construction is likely to differ significantly across the site and that this will have resulted in a variable level of survival of archaeological remains.
548. Norfolk County Council Historic Environment Service (HES) have previously expressed the desirability for further evaluation work being carried out prior to the determination of the planning application to provide additional information about the surviving depth of archaeological deposits at the site. However, the nature and condition of the standing structures at the site means that this is not practically possible. Consequently, if planning permission is granted they advise additional informative archaeological investigations will need to be carried out at an early stage in the programme of post-consent archaeological mitigatory works. In the event of planning permission being approved HES recommend a planning condition requiring a programme of archaeological mitigatory work in accordance with *National Planning Policy Framework* para. 141.

Flood risk and surface water drainage

549. Key policies and NPPF paragraphs – JCS1, DM5, NPPF paragraphs 100 and 103.
550. A Flood Risk Assessment has been prepared and submitted as a document supporting the application. The assessment indicates that the site is at low risk of flooding from fluvial and tidal flooding, and whilst groundwater would appear to be relatively high, there is no evidence of groundwater flooding.
551. Surface water mapping information shows part of the site to be at high risk of surface water flooding. The mapping data indicates an existing flow path through the site which passes down Botolph Street and Magdalen Street to the south. This flow path is likely to be associated with a lost watercourse, known as the Dalymond Dyke, which originally followed the course of natural streams but came to form an integral part of the sewerage system of medieval Norwich.

552. The Surface Water and Drainage Strategy has been formulated for the development this includes attenuation and controlled discharge into existing drainage as a strategy as well as SUD landscape measures (green roofs and podium landscaped areas). Areas vulnerable to flooding in extreme rainfall events have been identified, these include the Edward Street loading bay, block J loading in particular and to a less extent parts of blocks A, D, basement of the cinema and pedestrian walkways up to a depth of 0.16m. A number of mitigation measures have been recommended including installing flood sensors and alarms in vulnerable areas, having a flood warning and evacuation system across the site, using flood resilient construction methods and tanking the low-lying areas of the site.
553. The lead flood authority have reviewed the drainage strategy and following seeking clarification on 'build over' of sewer requirements and the detailed location of attenuation tanks, has confirmed no objection to the development subject to the imposition of conditions relating to the detailed design specifications of the drainage scheme and flood mitigation measures.

Contamination

554. Key policies and NPPF paragraphs – JCS 1, DM11, NPPF paragraphs 178-179-122.
555. A Phase I Desk Study/Preliminary Risk Assessment has been submitted as a document supporting the application. This indicates that former uses of the site may have resulted in contamination and recommendations are included within the report regarding the need for further intrusive investigation. In addition the recommendations include an UXB survey of the site and gas and ground water monitoring. The Environment Agency and the council's EPO has confirmed no objection to the development subject to conditions securing further contamination investigation/suitable remediation and verification; controls over infiltration SUDs, piling; asbestos survey of the site, controls over material disposal, controls over soil importation

Health Impact

556. Key policies and NPPF paragraphs – JCS7, DM1, NPPF paragraphs 91-95.
557. In accordance with JCS 7 a Health Impact Assessment prepared to identify potential effects on the health (both physical and mental) of the new and existing population, construction workers, permanent employees and visitors to the site arising from the redevelopment of Anglia Square.
558. The baseline assessment provides an overview of demographic, socio-economic and health profile of the local population. It also sets out the current living environment, levels of community infrastructure provision and environmental conditions of the Local Impact Area, where possible compared against Norwich and the East of England. The HIA indicates that the mixed-use development is expected to facilitate regeneration for this part of Norwich and will have a direct and indirect impact on the health and well-being of the receptor groups.
559. During the construction phase temporary adverse impact is predicted on the following health determinants: access to healthcare services, social infrastructure,

open-space and nature; as well as on air-quality, noise and neighbourhood amenity, accessibility and active travel; crime and community safety, and social cohesion principally as a result of disruptions and route diversions and street closures to accommodate construction activities and the erection of hoardings. To mitigate this impact the assessment recommends a Construction Environmental Management plan (CEMP), this will include measures to a manage noise, traffic, dust and disruption associated with the construction phase. The Local Employment Strategy, the Anglia Square Management Plan and the Sustainable Communities Strategy (referred to in previous paragraphs) will include measures to support local employment opportunities, continued access to shops and services within the centre along with community events and liaison during the construction period.

560. In terms of the operational phase, the HIA predicts beneficial impact with regards to housing quality and design; access to social infrastructure; access to open-space and nature; accessibility and active travel; crime reduction and community safety; access to healthy food; access to work and training; social cohesion and Lifetime Neighbourhoods. Reference is made to the 1,250 new residential units including a mix of tenure types and dwelling sizes, which will help to meet housing needs; the mix of proposed commercial floorspace which will support an increase in the quantum and types of employment opportunities; improved shopping and facilities; the provision of high quality public open spaces, and improved pedestrian and cycle connections, all of which are pathways to better health outcomes. Local lettings arrangements for the affordable housing, the Local Employment Strategy and the Sustainable Communities Strategy referred to earlier in the report will be important in securing these benefits and health improvement outcomes.
561. Norfolk County Public Health in their response recognise pockets of high levels of deprivation in this part of the city and the benefits new employment and housing opportunities offer for existing local residents. However, they raise concern over local air quality and recommend that suitable mitigation should be secured during the construction phase as well as measures relating to: the protection of homes/future occupiers, travel planning, EVCP and car club provision.

Compliance with other relevant development plan policies

562. A number of development plan policies include key targets for matters such as parking provision and energy efficiency. The table below indicates the outcome of the officer assessment in relation to these matters.

| Requirement | Relevant policy | Compliance |
|--------------------------|------------------------|---------------------------------|
| Refuse Storage/servicing | DM31 | Yes subject to condition |
| Water efficiency | JCS 1 & 3 | Yes subject to condition |

Equalities and diversity issues

563. The socio-economic section of the report includes reference to a number of features of the development which will seek to promote equality and diversity. In summary these include:

- Improved access to affordable housing - minimum of 120 affordable dwellings proposed.
- 10% of new homes to comply to meet 2015 Building Regulations M4(2) for accessible and adaptable dwellings (replaces the Lifetime Homes standard).
- Improved access to new employment opportunities
- Level access across the development
- The provision and of public toilets including the provision of a Changing Places facility
- Public realm planned to be accessible and inclusive

S106 Obligations

564. Key policies and NPPF paragraphs – JCS4, DM33, NPPF paragraphs 54-57.

565. The applicant has agreed to entering into a S106 Obligation with the council to secure the following:

| Matter to be secured | • Details |
|--|--|
| <ul style="list-style-type: none"> • Affordable housing provision | <ul style="list-style-type: none"> • Provision of min of 120 affordable dwellings for 85% social rent, 15% intermediate tenure. • Phased delivery of affordable dwellings including delivery of block D (41 units) prior to the occupation of 200 dwellings in phase A |
| <ul style="list-style-type: none"> • Viability Review | <ul style="list-style-type: none"> • Reserved matters stage/s • In the event of the development not being built out at an agreed rate. • Fixed reviews at 50% and 90% occupancy of the development. <p>In the event of improved viability additional housing units to be secured. In the case of final review this would be in the form of an</p> |

| Matter to be secured | • Details |
|---|---|
| | affordable housing contribution. |
| • Employment and Skills Strategy | • Agreement and implementation of a strategy: measures to optimise local labour supply chain and procurement |
| • Sustainable Community Strategy | • Agreement and implementation of a strategy: measures for achieving an inclusive community and encourage social cohesion between the new and existing communities. |
| • Anglia Square Management Plan | • Agreement and implementation of a strategy: measures to mitigate the impact of the development on existing businesses and tenants |
| • Discounted commercial floorspace | • Floorspace on Pitt Street and Edward Street to be secured for SMEs on flexible and discounted terms (first refusal existing tenants) |
| • Car Club Contribution | • Phased payment – total £122,000 (sufficient to provide 7 car club vehicles) |
| • Under the Flyover Contribution | • Commuted sum (£240,000) to fund a public realm scheme in the event of an alternative scheme not being delivered within an agreed timescale |
| • Green Infrastructure Contribution | • Commuted sum – (£50 per dwelling) to fund measures to mitigate the impact of the development on European designated sites. Phased payment triggered in the event of CIL relief being approved |
| • Public access rights | • Secure public access across the development for pedestrians and cyclists |
| • Management and maintenance responsibilities | • Trees and landscaped areas within the highway |

566. The S106 Obligation is necessary to ensure the development complies with policy requirements of the adopted development plan and to mitigate the impact of the development on European designated sites. The obligation is required to make the development acceptable in planning terms and therefore meets the tests for such agreements set out in the NPPF.

Local finance considerations

567. Section 75ZA of the Town and Country Planning Act 1990 requires that financial benefits information is included within planning reports. This requires benefits to be identified whether or not they are regarded as being material and a statement to be given about whether the benefit is considered material to the application.
568. The scheme proposed represents an approximate £270m investment in one of the most deprived parts of the City which will take place over a prolonged period. As such it will have considerable financial benefits in terms of direct and indirect employment during the construction period and a likely further increase in employment levels in the commercial space created and that arising from the spend of future residents. These impacts were considered fully in Main issue 6 of the report and are clearly material considerations in reaching a planning decision.
569. However, the scheme will give rise to other local finance considerations such as:
- A considerable increase in Council Tax revenues compared to the current situation. This would only be material to the planning decision if it were considered to help make the development acceptable in planning terms. Whilst the income raised may be significant the development will also create commensurate demands on Council services and in the absence of any evidence that any increase in Council Tax revenues will be directed into the area this impact is not considered material to the planning decision.
 - A changed level of business rates income which is considered likely to be an increase on the current situation when the development is complete. In the absence of any evidence that any increase in business rates will be directed into the area this impact is not considered material to the planning decision.
 - New Homes Bonus. At present the future of New Homes Bonus is uncertain so it is not known whether development of Anglia Square would result in financial benefit to the Council. In this situation this is not considered material to the planning decision.
 - Community Infrastructure Levy. The development may give rise to Community Infrastructure Levy. The rates that it may give rise to are uncertain given that Levy rates may change over the duration of the scheme but at current rates the potential CIL liability of the proposed scheme is estimated at £8.8m. If generated 5% of this would be taken to cover administrative costs, 15% would go into the neighbourhood fund and be used at the City Council's discretion and 80% would be pooled into the Greater Norwich Growth Board to spend on strategic infrastructure priorities. The developers have indicated that the development as proposed would not be viable if the development was required to pay CIL. They have provided a viability assessment to demonstrate this and have indicated they will be applying for Exceptional Circumstances Relief (ECR) from CIL should the Council introduce a policy to enable them to do so.

Assuming the ECR policy is introduced and planning permission is granted then an application for full relief may be submitted in the new year. Such an application will require further information to be submitted that is not currently available (most notably an apportionment assessment between the different

interested parties) and as if it is recommended for approval it will need to be determined by Planning Applications Committee. It is important that any decision on whether to grant relief is taken at the right time and with access to full information. Therefore members should not seek to come to a judgement on the acceptability of such relief being granted at this point. It should also be noted that ECR can only be sought in relation to individual phases of the development and it is expected that an initial application will relate only to block A and be a claim for full relief from £2.6m of CIL. Any applications for CIL relief for subsequent phases will need to be made following the consideration of reserved matters applications and will require updated viability information to be produced.

The availability (or otherwise) of finance to assist with the provision of infrastructure is considered to be material to determination of this planning application. In the circumstances and in the light of the evidence to date it is considered appropriate to assess the acceptability of the current proposals on the assumption that no CIL revenues will be forthcoming from the development to deliver infrastructure improvements to assist with ameliorating the impacts of the development at least in relation to phase 1 of the development and that the proposed sec 106 agreement allows these impacts to be managed satisfactorily.

- Other government grants. It is also relevant to note that the City Council has applied for a grant from Homes England's Housing Infrastructure Fund. The application has been provisionally accepted and it has been announced the Council may be able to draw down up to £12.26m of funding. It should be noted that at this stage in the process there is no confirmation that the Council will be able to draw down the funding. Homes England are still considering a revised version of the bid amended to be fully reflect the application under consideration and are likely to await confirmation of the determination of the planning application before releasing any funds. Furthermore should the funding be received it is expected it will be ring fenced specifically to fund the delivery of infrastructure designed to support delivery of the proposed development and the Council will have little flexibility in how to apply it.

570. Whilst this matter is a material planning consideration it is not suggested that any weight is attached to it in reaching a planning decision as the viability assessment and officer assessment of the proposal is already predicated on the assumption that this funding will be forthcoming.

Conclusions and striking the planning balance

571. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications for planning permission must be determined in accordance with the development plan unless material considerations indicate otherwise.

572. Following the expiration of the Northern City Centre Area Action Plan there is no policy specifically addressing the redevelopment of Anglia Square, however, development plan policy is strongly supportive of the principle of redevelopment of this brownfield site. The redevelopment is a long held strategic objective of the Council as expressed through development plan policies and associated guidance over the years. The site was first identified for comprehensive redevelopment in

the City of Norwich Local Plan which was adopted in 2004 and current JCS 11 (adopted 2011) firmly establishes the regeneration of the Northern City Centre, including Anglia square, as a strategic planning policy objective. Much more detail is given in the Anglia Square policy guidance note although it should be noted this carries a lesser weight in the decision making process as it is not part of the development plan.

573. The steady deterioration in the appearance of the site and the condition of Sovereign House and the MSCP in particular makes the case for re-development stronger now, than when the JCS was first adopted. The revisions to the National Planning Policy Framework that were published over the summer strengthen the case for maximising the efficiency in the use of land and increasing densities in areas well connected central locations and the announcements of transforming cities funding made more recently give increased confidence that further infrastructure enhancements will be forthcoming over the next few years to serve the area.
574. The visible signs of vacancy and dereliction blight the image of this part of the city centre and send a negative message to the development sector. Although Anglia Square is a significant development opportunity, evidence has been submitted indicating that the specific characteristics of the site present very substantial challenges to potential developers. The site is large, highly constrained and supports an operational shopping centre. Comprehensive redevelopment requires the demolition of one of the largest buildings in Norwich, potential extensive archaeological investigation, contamination remediation and construction of a replacement chapel. The costs of developing this site are therefore exceptionally high, the time lag between costs being incurred and new development being able to be sold is considerable, and current values in this part of the city are low. In this circumstance the evidence is clear that viability constraints mean that any regeneration of the site will involve compromises to be made. It is clear that a scheme that is not viable will be unlikely to be delivered at all.
575. The proposal represents the largest development scheme proposed in the city centre since Chapelfield. The £270million investment will: enhance the physical appearance, the retail and leisure function and overall vibrancy of the site; create a new residential quarter at Anglia Square which will have good connectivity to the existing surrounding community, and boost the city's housing supply and confidence in the northern city centre as a location for wider re- development. JCS 11 identifies Anglia Square as an 'area of change' for mix development and the proposal in terms of scale and ambition is capable of delivering the policy objective of comprehensive regeneration.
576. The proposed 1209-1250 dwellings will make a very substantial contribution to housing supply in the city. This residential –led scheme will directly support the housing delivery objectives of JCS4 and the NPPF in terms of significantly boosting the supply of homes. The quantum proposed represents 2.6 years of supply planned for the city at a time that the Greater Norwich authorities cannot demonstrate a five year housing land supply against the JCS housing targets. In the planning balance, the amount of housing proposed, and the strategic objective of regenerating the site is capable of being afforded substantial weight. Furthermore although the amount of affordable housing is well below policy compliant levels, the 102 social rented properties and 18 intermediate, in terms of tenure and dwelling type will make a very substantial contribution to addressing

housing need in this part of the city. In view of the scale of the proposal, which effectively establishes a new residential neighbourhood, a lesser level of provision of affordable housing would be regarded as rendering the entire development unacceptable regardless of the viability position. The proposed 120 affordable homes are an absolute development requirement, and the proposed S106 Obligation makes no provision for this number being reduced only increased.

577. The existing shopping centre is outdated and has limited capacity to serve a large district centre function. The replacement of the existing commercial floorspace with a mix of premises suitable for shopping, leisure, hotel and offices uses will create substantial new job opportunities (up to 563 new jobs) and support the long term viability and vitality of the wider Anglia Square /Magdalen Street district centre. This will strengthen the economic base of the northern city centre and enable this part of Norwich to contribute to the city's regional role as a focus for retail, leisure and employment. Account has been taken of local community needs and protecting the function of the primary/secondary shopping areas of the city centre. A range of planning conditions are recommended which will require: premises to be available within the centre for smaller scale and local retailers/businesses, a new food store will be secured in phase 1, and restrictions have been imposed on the core retail space to limit the risk that the location will compete with the city's prime shopping areas. On this basis the development in terms of the quantum and mix of commercial development and the resulting economic benefits directly supports the policy objectives of JCS policies 5, 8,11,19, DM1, 18 and 20 and significant weight can be attached to these benefits.
578. In terms of judging whether the development will achieve wider regeneration aims, sustainable objectives set out in DM1 are material considerations. The first of these relates to enhancing and extending accessible opportunities for employment, supporting and enabling balanced, sustainable economic growth in the Norwich economy. The preceding paragraphs describe a number of economic benefits associated with the development. Further benefits relate to the 400 – 480 jobs predicted to be created in the 8 year construction project and the impact this scale of building project will have in terms of boosting the city's profile and attractiveness to other inward investment. The ability of this development to act as a catalyst for wider change within the northern city centre is a significant material consideration. It is further significant that the developers have indicated their agreement to a local employment strategy for the duration of the development this will create conditions for local people and business to benefit from the development.
579. The second DM1 objective relates to protecting and enhancing the physical, environmental and heritage assets of the city and clearly these are particularly significant considerations in relation to the proposed development.
580. The architectural and historic quality of Norwich city centre is of great national importance, having developed over at least 1000 years and containing a wealth and density of heritage assets, many enjoying the highest levels of protection. The entire area within the city walls is a conservation area. A very detailed evaluation of the design quality of the proposed development and the impact it is expected to have on these heritage assets has been carried out.
581. Much of the development site is a wasteland. Several of the largest and ugliest buildings on the site are empty. The layout is introverted and inhibits movement

through the city on foot and by bicycle. The condition of Anglia Square has been deteriorating for years due to its inherent design failings. These features mean that the Anglia Square character area has the lowest possible rating of significance in the City Centre Conservation Area Appraisal and the greatest scope for improvement.

582. An urban design assessment has been based on the Building for Life assessment method. The scheme performs reasonably well against the twelve questions, receiving nine greens and three ambers. The design strengths of the scheme are:

- Provision of new and improved movement connections between St Augustine's Street and Magdalen Street and between St George's Street and Edward Street on the general alignment of historic routes in the area.
- It is well served by local facilities and offers better facilities so that residents would have excellent access to the goods and services they need.
- Residents and shoppers would enjoy excellent access to public transport and high-density development in this location would help to reduce dependency on using cars.
- The size of the new homes is appropriate to the identified need.
- A sense of place would be created that is distinctive, interesting and vibrant.
- Mature trees would be retained and more trees planted.
- Wildlife habitat would be created on a site that is ecologically barren.
- Well-defined and interesting streets and open spaces would be created with good natural surveillance.
- There would be a clear distinction between public, semi-private and private space helping with management of spaces and combatting anti-social behaviour.
- Clear building entrances would be provided on street frontages.
- Plentiful and well located cycle parking would be provided.
- Residents would have access to generous shared podium gardens.

The weaknesses of the scheme are:

- The scale of the development fails to harmonise with its surroundings in terms of the height of some buildings and the size of block footprints.
- Fewer affordable homes are provided than the policy target.
- Locally listed buildings on Pitt Street would need to be demolished to facilitate the development.
- There are long internal routes from the residential lobby entrances to many flats through windowless corridors.
- The public car park cannot be accessed directly from Magdalen Street.

583. The proposed 20 storey tower has been a particularly controversial aspect of the development. It is accepted that Norwich is capable of evolving beyond its earlier pattern, where all the prominent buildings were concentrated to the south of the River Wensum, and that the tower could effectively symbolise the new activity and spaces that are being created in the northern part of the city centre as part of the growth of the city centre that serves a much more populous and expansive hinterland than was historically the case. This differs from the view of Historic

England that the taller buildings in this part of the city that alter the skyline are inherently illegitimate.

584. The entire development would be visible from many places in and around the city centre. These impacts have been exhaustively reviewed. Views within Magdalen Street looking south from the junction with Edward Street have been identified as being significantly improved as a result of replacing the poor quality buildings that front the street with higher quality buildings. By contrast, in many cases it was found that the development would have a harmful effect on the setting of heritage assets and an adverse townscape and visual impact. The most serious of these are:

- The view towards the development from the Castle ramparts (view 12) which would obscure part of the landscape setting of the city and diminish the sense of being in a defensive position above the city, from which the Castle derives some of its significance as a heritage asset.
- The view south along St Augustine's Street from the junction with Sussex Street (view 16) from which the development would appear to loom in a disturbing way above this sensitive street with its listed buildings.
- The view north along Wensum Street from the junction with Elm Hill (view 25) from which the development would appear to loom in a disturbing way above this sensitive street with its listed buildings.
- The view south along Aylsham Road from the pedestrian refuge close to the junction with Green Hills Road (view 49), where the Anglican Cathedral would be diminished by the introduction of large-scale new development as the focus of the view on this axis of arrival into the city centre.

585. The development has not been found to inflict substantial harm on any designated heritage assets, although substantial harm through total demolition would be caused to a locally listed heritage asset - 43-45 Pitt Street. It was found to have a less than substantial impact on a number of designated heritage assets, including:

- Anglican Cathedral
- Roman Catholic Cathedral
- Castle
- City Hall
- St Peter Mancroft
- Guildhall
- St Andrews and Blackfriars Hall
- St Peter Hungate
- 2-8 Elm Hill
- Britons Arms
- 1-11 St Augustine's Street
- 21-29 St Augustine's Street
- 22-36 St Augustine's Street
- 71-73 New Botolph Street
- St Augustine's Church
- 2-12 Gildencroft
- City Wall at Magpie Road
- Maids Head Hotel
- 9-13 Wensum Street

- Fye Bridge
- 2-8 Fye Bridge Street
- 9-13 Fye Bridge Street
- St Clement's Church
- 3 Colegate
- St Martin at Oak
- 47-49 St Martin's Lane
- St George Colegate
- Bacon House
- Doughty's Hospital

586. The cumulative harm identified above is to some extent offset by other beneficial aspects of the development for the historic environment. These benefits have been scarcely acknowledged by Historic England in their comments on the application:

- The removal of areas of undeveloped wasteland off Pitt Street.
- The removal of buildings identified as negative in the city centre conservation area appraisal.
- The reinstatement of streets on an alignment close to those that previously existed on the site resulting in clear relationships between surrounding streets and the development.
- New streets and squares with a high quality landscape treatment that, combined with the new accommodation, will attract people to the area and resulting more people appreciating the surrounding parts of the conservation area.
- Framed views of St Augustine's Church and the Anglican Cathedral from within the development.
- Higher quality replacement buildings on Magdalen Street.

587. These benefits undoubtedly serve to enhance the Anglia Square character area. However, in heritage terms alone this enhancement is cancelled by the more diluted and dispersed but nevertheless significant cumulative harm to the wider conservation area and numerous important heritage assets within it. On balance, therefore, in heritage terms, the harm caused by the scheme is considered to be greater than the benefit to be derived from it.

588. The NPPF is clear in paragraph 193 that great weight should be given to the conservation of heritage assets and that the weight afforded to their conservation should be greater where, as in this case, assets of the highest importance are involved. The Landscape Visual Impact Assessment has highlighted a wide range of harmful consequences to these heritage assets arising from the proposals for Anglia Square. Paragraph 194 of the NPPF expects clear and convincing justification for this harm and paragraph 196 requires there to be very considerable public benefits arising from the development, including, where appropriate, securing its optimum viable use to justify granting planning approval.

589. The third DM1 objective relates to combating climate change. The application site is one of the most sustainable sites in the city for development. New residents will have direct access to shops, cafes and other services within the centre and will be able to easily walk into the city centre. Cycle networks and bus routes passing along Magdalen Street will benefit residents, shoppers and visitors to the centre.

The location of the site provides the very best opportunities for reducing the overall need to travel and reducing dependency on private cars. The level of parking is high, but public parking is below current levels. A range of measures are proposed to promote sustainable travel, including residential and commercial travel plans, cycle parking, the provision of car club vehicles and EVCPs. The energy strategy for the development includes the provision of air source heat pumps to meet 18% of the required energy for the whole development, exceeding the minimum requirement set out in JCS 3. Furthermore the scheme includes a comprehensive landscape for this site which is currently devoid of green areas. A substantial level of tree planting is proposed within and on the edges of the scheme, a necessary requirement to not only enhance the streets but to assist in mitigating NO₂ levels in this part of the city. The landscape strategy which also includes podium gardens and extensive green roof provision will result in a substantial ecological enhancement of this site, a development benefit positively encouraged in DM 6

590. The fourth DM1 objective relates to matters of safety and security, maximising opportunities for improved health and well-being and safeguarding the interests of the elderly and vulnerable groups. The re-planning of the site provides the opportunity to create well used streets and public spaces which will discourage crime and antisocial behaviour. The proposed public realm is designed to function as community space, for sitting, socialising and play and it is important that these spaces are delivered at a high standard. One of the aims of the proposed Sustainable Community Strategy will be to ensure that these spaces are used for the benefit of the local community. The scheme includes provision for 10% of homes to be adaptable and accessible, public toilets, a Changing Places facility and the shopping centre owners have agreed to make provision for mobility scooters. These measures in combination are beneficial to health and wellbeing and inclusivity.
591. The last DM1 objective promote mixed, diverse, inclusive and equitable communities, by increasing opportunities for social interaction, community cohesion, cultural participation and lifelong learning. The development will result in the creation of a substantial new residential community. The local letting policy, the Sustainable Community Strategy, the Anglia Square Management Plan and the Local Employment Strategy are important to the achievement JCS spatial planning objective 4, of ensuring that development brings benefits to local people, especially those in deprived communities. The development with these measures in place is predicted to reduce level of deprivation in this part of the city and significant weight can be attached to this outcome.
592. Objectors to the scheme argue strongly that the development will result in gentrification and will not benefit the local community. However, on the basis of the range of outcomes set out above, the development is judged to perform well in terms of regeneration effects. Many of the objectives identified in the Anglia Square PPG are met by the development. These include; reinvigorating the local economy; revitalising the retail and service provision; providing significant levels of housing; enhancing evening economy and improving pedestrian and cycle movements. However, there are notable exceptions where the development performs less well these include; enhancing cultural provision; enhancing the historic environment and achieving a clear relationship in built form with the surrounding area. In addition objectors would also point to objective 2 and the creation of an attractive environment for people living in, working in and visiting

the area. The objections raised in representations in particular relate to matters of overdevelopment, scale, density and height of the development. These objections are well founded and the issues raised are matters covered by both development plan and NPPF design policies. These objections therefore have to be carefully considered.

593. It is not disputed that the proposed form and density of the scheme will contrast with traditional and contemporary patterns of development in Norwich. The Building for Life evaluation of the scheme has highlighted a number of design strengths but also a number of significant weaknesses, in particular the failure of the development to harmonise with its surroundings in terms of the height and the size of block footprints. Ensuring development is 'sympathetic to local character and history, including the surrounding built environment', is a core design principle of JCS 2, DM3 and the NPPF (para 127 of the NPPF) and therefore this is a significant weakness of the scheme. The proposed design approach results in a high proportion of single aspect flats and there is evidence that the height and massing of the development will result in undesirable levels of overshadowing of buildings adjacent to the site (Dalymond Court in particular), a proportion of proposed dwellings within the development and sections of streets and public spaces. Amenity levels and the quality and functionality of the development would undoubtedly be improved by a scale of build form which was more human in scale and reflective of Norwich. Changes have been made to the height and massing of parts of the scheme both at pre-application and application stage. These amendments have led to improvements but fundamentally the form and massing of the scheme has been determined by the commercial development brief, i.e. a mix and quantum of development the applicants consider viable.
594. Due to the nature of the development proposal considerable evidence has been provided in relation to both development viability and alternative development options.
595. In all six alternative options to the current scheme have been considered and whilst it is very difficult to be definitive that this has captured all possible alternative options for the comprehensive redevelopment of a site of the scale and complexity of Anglia Square officers are of the view that this exercise is robust and credible and has captured the range of possible alternatives options can reasonably be identified at this time.
596. The viability assessment was published in early September alongside the revisions to the scheme. It has drawn little comment from those making representations on the scheme and somewhat surprisingly Historic England have declined to have it reviewed even though they were alerted to its potential significance in relation to determination of the application. The viability assessment has been thoroughly reviewed by the District Valuation Office who concluded that it is "a robust assessment of the viability taking account of the current stage of the development process" and that the level of development profit it shows (15.6%) is some way below what is regarded as a reasonable target for profit in relation to a scheme of this nature (18.5%). Both percentage figures are profit expressed as a proportion of Gross Development Value.
597. The 15.6% profit figure is calculated using a nominal £1 figure for existing land value and assuming that £12.2m Housing Infrastructure Funding is forthcoming,

full exceptional circumstances relief is granted from CIL and that a less than policy compliant level of affordable housing is considered acceptable.

598. There can be no certainty about what would happen in the event that the proposed scheme does not proceed. As the site is in private ownership it could be sold and any new owners might have different objectives in terms of how they would approach this site. However, the site has been suffered from considerable levels of dereliction of decay for over 20 years and in the light of the evidence provided by the examination of alternatives and the viability assessment it is considered that, due to the very high costs of redevelopment and the constraints imposed and revenues generated by the current uses on the site, the mostly likely outcome should the proposed development not come forward is that the site will continue to be managed in the way it has been for the past 20 years with minimal investment in the physical fabric of Anglia Square with the resultant continuation of the gradual decline of the centre and the blight it brings to this part of the northern City Centre area.
599. As a result of this analysis officers are of the view that in practical terms the proposed development does represent the optimum viable use for the site.
600. Officers are aware that the marginal viability of the scheme does create a level of risk that it will stall at some point during the development process. A number of respondents have also highlighted this risk as one that should be borne in mind because of the history of this particular site. Officers are of the view that the primary risk here is of the scheme stalling between phases. Both the owners and the developer are considerable sized companies with high levels of creditworthiness and the clear capabilities of delivering development at this scale. Their reliance on exceptional circumstances relief to make the scheme viable offers reassurance that it will be these companies that undertake the development.
601. There does though appear to be a risk that the development may stall between phases. A risk that is exacerbated by the Council's insistence on the level of affordable housing that is included within the scheme as minimum for the scheme to be considered acceptable. The viability of the scheme is highly dependent of securing the values predicted for the homes being built. If there is a significant reduction in house prices generally or properties built at Anglia Square do not prove to be desirable in the local market then there is a real risk that the submitted scheme will not be completed. To some extent this risk is present on all schemes of this scale and complexity and it cannot be eliminated entirely. There is no practical way that a developer can be obligated to build out subsequent phases. The risks in this regard are considered particularly acute between phases 1 and 2, the risks of the scheme stalling after phase 2 are considered less as the majority of infrastructure costs will have been overcome by then. The potential availability of Housing Infrastructure Funding does offers some possibility of the risks of the scheme stalling between phases 1 and 2 being minimised (by the funding being linked to provision of infrastructure needed to deliver phase 2) although there is no way these risks can be totally avoided.
602. Historic England have objected in the strongest possible terms to this application and state that *'the development would result in severe harm to Norwich's historic character, to the historic significance of the Norwich city centre conservation area as a whole, to several important spaces within it and to numerous scheduled*

monuments, listed buildings and registered historic parks, many of them designated at a high grade and some of European significance. Furthermore they confirm that in the event of the local planning authority being minded to grant consent they will refer the case to the National Planning Casework Unit and request it to be called in for determination by the Secretary of State. In terms of decision making Historic England rightly direct the council to the NPPF which requires that economic, social and environmental gains should be pursued in mutually supportive ways through the planning system, and to the great weight it accords to the conservation of designated heritage assets should be greater the more important the asset or assets (paragraphs 8 and 193). Furthermore they indicate in determining this application the council should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the buildings or its setting or any features of special architectural or historic interest which it possesses and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

603. In terms of heritage impact, officers have had regard to benefits of the scheme listed in para. 586 which will serve to enhance the Anglia Square character area. These benefits moderate officers' assessment of harm to a level below that Historic England describe in their response, but nevertheless a level that under 194 of the NPPF would require very clear and convincing justification. Para 196 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits. In making a planning judgement on this application given the identified level of harm to Norwich's heritage assets, great weight should be attached to avoidance of this harm. The NPPF highlights that these 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.
604. In the final analysis the planning merits of the proposed scheme are considered to be finely balanced. The scheme has divided opinion and it is the officer view that either a decision to approve or refuse the scheme could rationally be justified depending on the weight ascribed to particular considerations.
605. 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.

Recommendation

606. Following the outcome of the referral of the application to the National Casework Unit, to **approve** application no. 18/00330/F - Anglia Square including land and

buildings to the north and west and grant planning permission subject to the completion of a satisfactory legal agreement to include provision of affordable housing and matters listed in para. 565 and subject to the following conditions:

| Detailed element - Block A and tower | |
|---|--|
| 1 | Standard timescale |
| 2 | In accordance with approved plans |
| 3 | No implementation of tower until approval of reserved matters for block E/F |
| 4 | Materials and detailed drawings - (a) external flues/vents; (b) external decoration and patterning to brickwork, render, joinery and metalwork; (c) external materials (e.g. bricks, metal cladding of the upper level and rooftop plant, window frames, doors, rainwater goods, balcony balustrades, car park ventilation panels, green vegetated walls) (d) brick bond and mortar;(e) large scale cross-sectional plans showing depth of window reveals, depth of recesses offering vertical subdivisions in the facade bays and the projection of balconies(e) shopfront components |
| 5 | Detailed landscape scheme - public realm and highway; Full details of hard and soft landscaping, (including play trail artistic elements and heritage interpretation) (prior to commencement of above ground construction works) |
| 6 | Public car park management Plan ; tariff; variable message signing, provision for disabled drivers and EVCPs (prior to commencement of that use) |
| 7 | Within 2months of first use of the MSCP the public (including contract) parking use of the surface level parking shall cease (this does not preclude the use of this parking for operational parking associated with the construction phase) |
| Outline | |
| 8 | Time limit – Outline elements: access, layout, scale, external appearance, landscaping |
| 9 | Details outline – in accordance with details including parameter plans |
| 10 | Reserved matters to include –Blocks E/F and G/H parking monitoring data , Block B updated air quality assessment, Block G/H (formation of new access from St Crispins Road detailed AIA and AMS |
| All phases | |
| 11 | Maximum quantum - Housing - 1250, Flexible commercial – 11000sqm, Hotel – 11,350sqm Cinema – 3400sqm, sui-generis up to 250sqm; Public car park – 600 car spaces, 24 motorcycle spaces; Other parking maximum of 950 car parking spaces for Use Classes C1 / C3 / B1 / D1, (of which maximum of 40 spaces for C1/B1/D1) |
| 12 | In accordance with phasing plan or any other revised phasing plan agreed by the local planning authority |

| | |
|----|--|
| 13 | Prior to the commencement of any demolition works for each phase a demolition statement shall be submitted to and approved in writing by the local planning authority. The plan shall include a detailed methodology for the retention and protection of the retained frontages during the construction phase and be substantiated by a structural engineer's report. In the case of phase 1 the statement shall include works and arrangements in relation to 100 Magdalen Street |
| 14 | No demolition of Surrey chapel until practical completion of block C |
| 15 | No occupation of block E/F until demolition of Sovereign House |
| 16 | No demolition of 43-45 Pitt Street until a contract or sub-contract for carrying out the structural works of redevelopment on the site has been made and reserved matters approved for block E/F |
| 17 | Prior to the commencement of each phase submission and approval of Construction Traffic Management Plan and Access Route. |
| 18 | Details of highway scheme to be submitted and approved (prior above ground construction) i |
| 19 | Highway works to be completed in accordance with phasing plans to be submitted and approved |
| 20 | Edward Street Works to be completed (improved cycle route) prior to the commencement of above ground works block A |
| 21 | Prior to commencement of each phase – submission and approval of construction and environmental management plan (CEMP) |
| 22 | Archaeological written scheme of investigation - prior any works which break ground |
| 23 | Stop works if unidentified archaeological features revealed |
| 24 | Contamination conditions recommended by Environment Agency – conditions in relation to site investigation (including asbestos survey), remediation, verification and long term monitoring - relate to individual phases. (prior to any works which break ground) |
| 25 | The submission of a Desktop Study for unexploded ordinance (UXO) for the application site /evaluation of the implications upon the future use of the application site. |
| 26 | Stop works if unknown contamination detected |
| 27 | No infiltration without consent |
| 28 | Piling method statement for each phase – submission and agreement prior to piling operations commencing |
| 29 | All imported topsoil and subsoil for use on the site shall either (a) be certified to confirm its source and that it is appropriate for its intended use or (b) in the |

| | |
|----|--|
| | absence of suitable certification, analysis of the imported material will be required along with evaluation against the derived assessment criteria for this site. No occupation of the development shall take place until a copy of the certification has been submitted to the Local Planning Authority. |
| 30 | Detailed drainage conditions recommended by lead flood authority scheme – submission and approval (prior to works breaking ground) |
| 31 | Submission and approval of flood proofing measures |
| 32 | Submission and approval of flood warning and evacuation plan |
| 33 | Fire hydrants - details for each phase to be submitted and approved prior to any works which break ground |
| 34 | Secure by design – prior to commencement of above ground construction works each Phase submission of crime prevention strategy including details related to access to the residential element, front door servicing/emergency vehicle access, the commercial units and areas of car parking within each Phase |
| 35 | Further noise and air quality surveys shall be undertaken prior to the commencement of development for each Phase in accordance with schemes to be first approved in writing by the LPA |
| 36 | Air quality mitigation measures shall be submitted to and approved by the Local Planning Authority prior to the commencement of development for each Phase |
| 37 | The submission of acoustic surveys and approval of proposed mitigation measures (inclusion of details of sound attenuation between commercial spaces and adjoining dwellings, trickle vents, mechanical ventilation, glazing etc.) resulting in an attenuation to an internal level of 30dB at night, 35dB during daytime for habitable rooms, shall be submitted to and approved by the Local Planning Authority prior to the commencement of development for each Phase set out in Plan A02-P2-400 Rev A |
| 38 | Accessible/adaptable homes - 10% dwellings (applicable to market and affordable separately) |
| 39 | Water Efficiency – residential – 110l/person/day water efficiency |
| 40 | Water Efficiency - commercial - scheme for each phase prior to first occupation |
| 41 | Air Source Heat Pumps scheme for the Commercial and Retail Space, including the Hotel and Cinema shall be submitted for each phase, prior to first occupation of that phase (achieve the predicted generation level set out in approved Energy Statement). |
| 42 | External lighting scheme to be submitted and approved for each phase prior to first occupation of that phase – scheme should have regard to biodiversity consideration and air traffic safety |
| 43 | Travel plan (commercial) prior to occupation each phase |

| | |
|----|---|
| 44 | Travel plan (residential) prior to occupation each phase |
| 45 | Monitoring scheme – for car/cycle parking to be agreed with LPA – prior to first occupation |
| 46 | EVCP scheme for each phase to be submitted/approved/available for use prior to first occupation |
| 47 | The residential car parking shown on the approved plans within the development hereby permitted shall be used only for the residents and visitors of that development and for no other purpose, including public, commuter or contract parking |
| 48 | Full details of cycle and bin storage (residential) for each phase to be submitted to and approved - provision prior to first occupation each phase |
| 49 | Full details of cycle and bin storage (commercial) for each phase to be submitted to and approved - provision prior to first occupation each phase |
| 50 | Delivery and Servicing management plan - submitted and approved for each phase prior to first occupation |
| 51 | Provision of litter bins and waste collection facilities |
| 52 | The A3 and A4 premises which form the subject of this permission shall not be open to the public, trading, or have members of the public, as customers or guests, on the premises before 7am; or after midnight; Friday – Sunday or before 7am or after 11.30 Monday-Thursday unless otherwise agreed in writing with the Local Planning Authority. No cinema screening to commence after 00:30 |
| 53 | Odour/fumes - Before the any A3 or A4 use hereby permitted commences, a scheme shall have been submitted to and approved in writing by the Local Planning Authority for the effective control of fumes and odours from the premises |
| 54 | All external plant /machinery /equipment – full details to be approved prior to installation designed/selected (or attenuated) to be 5dB below the existing background level. |
| 55 | Telecommunication strategy |
| 56 | PD removal Part 16 GPDO telecommunications |
| 57 | Phase 1 of the development shall include provision of a single food store unit at least 800sqm GIA. Notwithstanding the provisions of section 55(2)(a) of the Town and Country Planning Act 1990 or the Town and Country Planning General Permitted Development Order 2015 (or any Act or Order revoking and re-enacting that Act or Order, with or without modification), the food store hereby permitted shall have a net sales area not exceeding [number] square metres, of which not more than 20% shall be used for the sale of non-convenience goods, where convenience goods are defined as everyday essential items, including food, drinks, newspapers/magazines and confectionery |

| | |
|----|---|
| 58 | The proposed total 9780 sqm GIA of flexible floorspace would include a minimum of 1500sqm (GIA) of A3/A4 uses. These uses (min of 75%) shall be centred around the new 'leisure' square (as identified on plan ref. Retail Strategy – Ground floor plan) and not exceed a total 3500sqm (GIA) |
| 59 | Phase 3 of the development shall include a replacement cinema |
| 60 | The floorspace identified on plan ref Retail Strategy – Ground floor plan shall include a minimum of 5 units less than 150sqm GIA and 5 units less than 250 sqm GIA |
| 61 | PD restriction for the creation of mezzanines |
| 62 | PD restrictions changes of use - Part 3 Class A – Restaurants, cafes or takeaways to retail (limit in leisure square?) Class M – Retail and specified sui generis uses to dwellinghouses Class O – Offices to dwelling houses |
| 63 | Scheme /arrangements for shop mobility facility/service |
| 64 | Anglia Square Public Space strategy - management and maintenance arrangement including: signage; use of spaces by public and tenants; security; event /noise management |

Informatives, including:

Norwich airport information relating to procedure for crane notification

None of the development (business or residential) will be entitled to on-street parking permits offered by the council.

Article 35(2) Statement

The local planning authority in making its decision has had due regard to paragraph 38 of the National Planning Policy Framework as well as the development plan, national planning policy, Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (EIA Regulations) and the Conservation of Habitats and Species Regulations 2017 and other material considerations, following negotiations with the applicant and subsequent amendments the application has been approved subject to appropriate conditions and for the reasons outlined in the officer report.

STANDING DUTIES

In assessing the merits of the proposals and reaching the recommendation made for each application, due regard has been given to the following duties and in determining the applications the members of the committee will also have due regard to these duties.

Equality Act 2010

It is unlawful to discriminate against, harass or victimise a person when providing a service or when exercising a public function. Prohibited conduct includes direct discrimination, indirect discrimination, harassment and victimisation and discrimination arising from a disability (treating a person unfavourably as a result of their disability, not because of the disability itself).

Direct discrimination occurs where the reason for a person being treated less favourably than another is because of a protected characteristic.

The act notes the protected characteristics of: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The introduction of the general equality duties under this Act in April 2011 requires that the council must in the exercise of its functions, have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by this Act.
- Advance equality of opportunity between people who share a relevant protected characteristic and those who do not.
- Foster good relations between people who share a relevant protected characteristic and those who do not.

The relevant protected characteristics are: age; disability; gender reassignment; pregnancy and maternity; race; religion or belief; sex; sexual orientation.

The council must in the exercise of its functions have due regard to the need to eliminate unlawful discrimination against someone due to their marriage or civil partnership status but the other aims of advancing equality and fostering good relations do not apply.

Crime and Disorder Act, 1998 (S17)

- (1) Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its

various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area.

- (2) This section applies to a local authority, a joint authority, a police authority, a National Park authority and the Broads Authority.

Natural Environment & Rural Communities Act 2006 (S40)

- (1) Every public authority must, on exercising its functions, have regard, so far as is consistent with the proper exercise of those functions, to the purpose of conserving biodiversity.

Planning Act 2008 (S183)

- (1) Every Planning Authority should have regard to the desirability of achieving good design

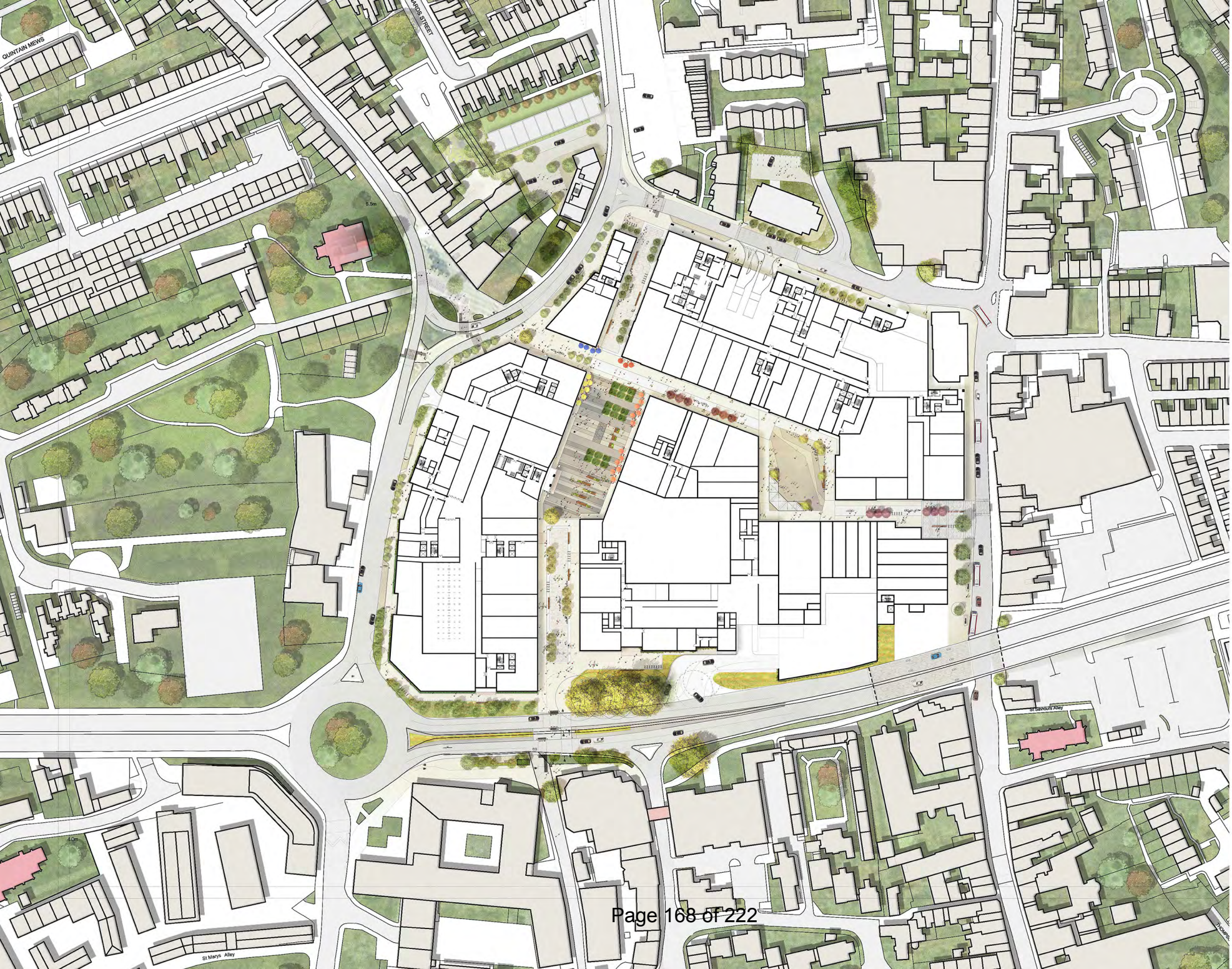
Human Rights Act 1998 – this incorporates the rights of the European Convention on Human Rights into UK Law

Article 8 – Right to Respect for Private and Family Life

- (1) Everyone has the right to respect for his private and family life, his home and his correspondence.
- (2) There shall be no interference by a public authority with the exercise of his right except such as in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the rights and freedoms of others.
- (3) A local authority is prohibited from acting in a way which is incompatible with any of the human rights described by the European Convention on Human Rights unless legislation makes this unavoidable.
- (4) Article 8 is a qualified right and where interference of the right can be justified there will be no breach of Article 8.

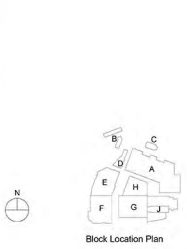
Application no 18/00330/F - Anglia Square including land
and buildings to the North and West Norwich

Plans and elevations



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 Drawing Number: AD1-P2-001
 Date: 01.03.18

Note:
 The footprint and layout of each building in the outline application, (outside the red line on drawing AD2-P2-101) is illustrative only.



Scale Bar (1:500):



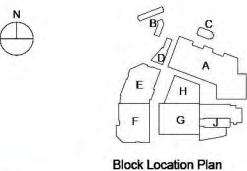
| No. | Description | Date |
|-----|---|----------|
| A | Tower footprint amended, Public WC's & Changing Places facility added to Block A Block E ground floor amended along Pitt Street. | 16.07.18 |

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 E: info@broadwaymalyan.com
 www.broadwaymalyan.com

Client:
 Weston Homes
 Project:
 Anglia Square
 Description:
 01-Masterplans
 Illustrative Masterplan
 Ground Floor

| ISSUED FOR PLANNING | | | |
|---------------------|----------------|----------|----------|
| Scale | Drawn | Check | Date |
| 1:500 | @AO | BMA | 01.03.18 |
| Job number | Drawing number | Revision | |
| 31467 | AD1-P2-001 | A | |

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KEY
 Hybrid Application Boundary
 Other land in the ownership of Columbia Threadneedle

Scale Bar (1:500)

| No. | Description | Date |
|-----|-------------|------|
| | | |
| | | |

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Client
Weston Homes
 Project
Anglia Square
 Description
**02-Site Layouts
 Hybrid Application Boundary**

Status
ISSUED FOR PLANNING
 Scale
 1:500 @A1
 Job number
 31467
 Drawing number
 A02-P2-100
 Drawn
 JP
 Date
 01.03.18
 Revision

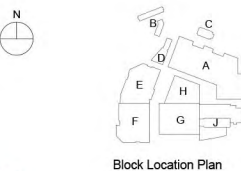
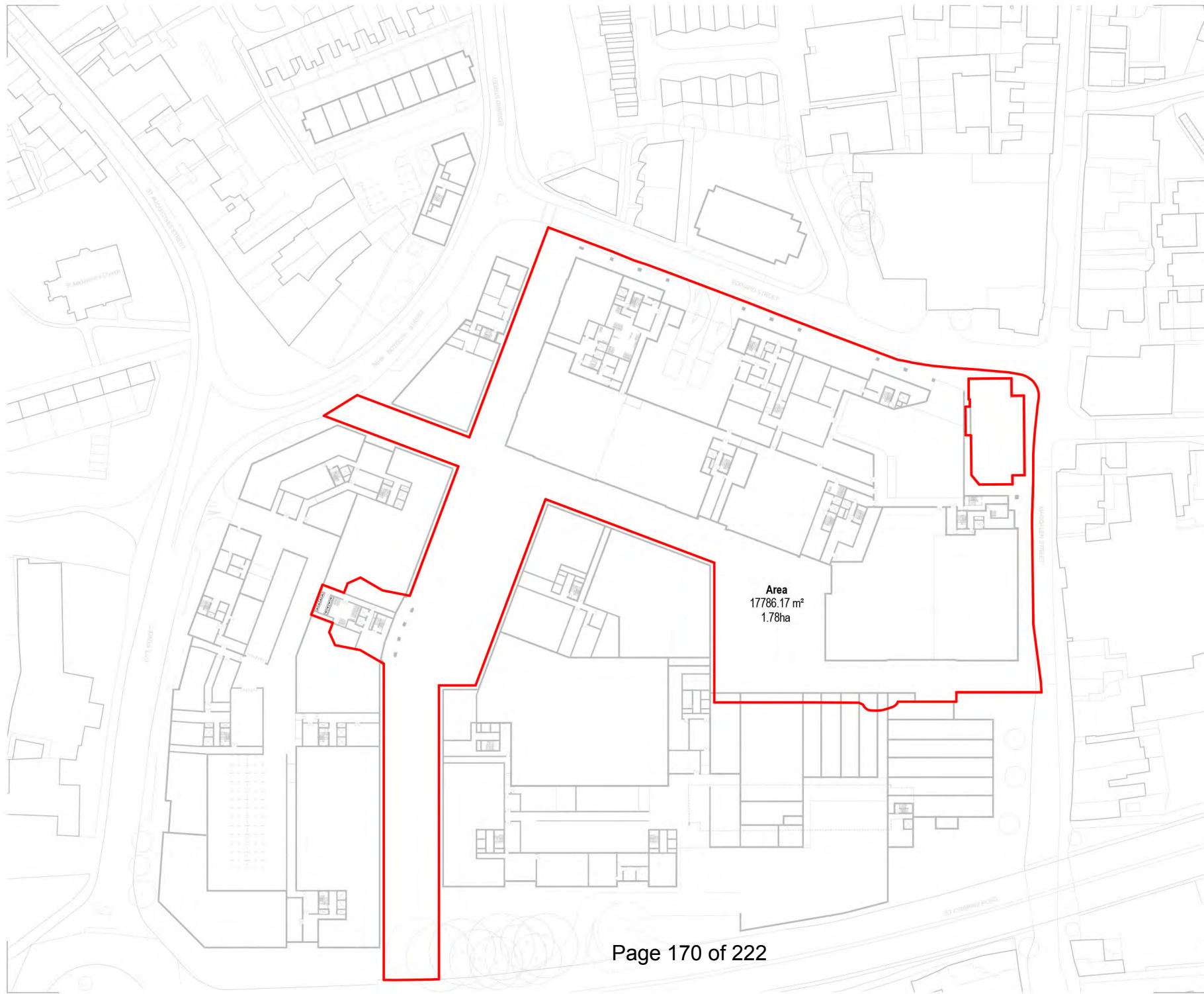
Area
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Area
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 0.13ha

Area
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 4.11ha

Area
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 0.25ha

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KEY
 — Detailed Application Boundary



| No. | Description | Date |
|-----|--|----------|
| A | Det.App. Boundary revised as per tower footprint & GF layout | 16.07.18 |

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Client
Weston Homes
 Project
Anglia Square
 Description
**02-Site Layouts
 Detailed Application Boundary
 On Proposed Layout Base**

Status
ISSUED FOR PLANNING
 Scale
 1 : 500 @A1
 Job number
 31467
 Drawing number
 A02-P2-101
 Drawn
 JP
 Date
 01.03.18
 Revision
 A

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- KEY**
- Existing cinema & upper level retail to be demolished
 - Existing structures to be demolished
 - Hybrid Application Boundary
 - Other land in the ownership of Columbia Threadneedle



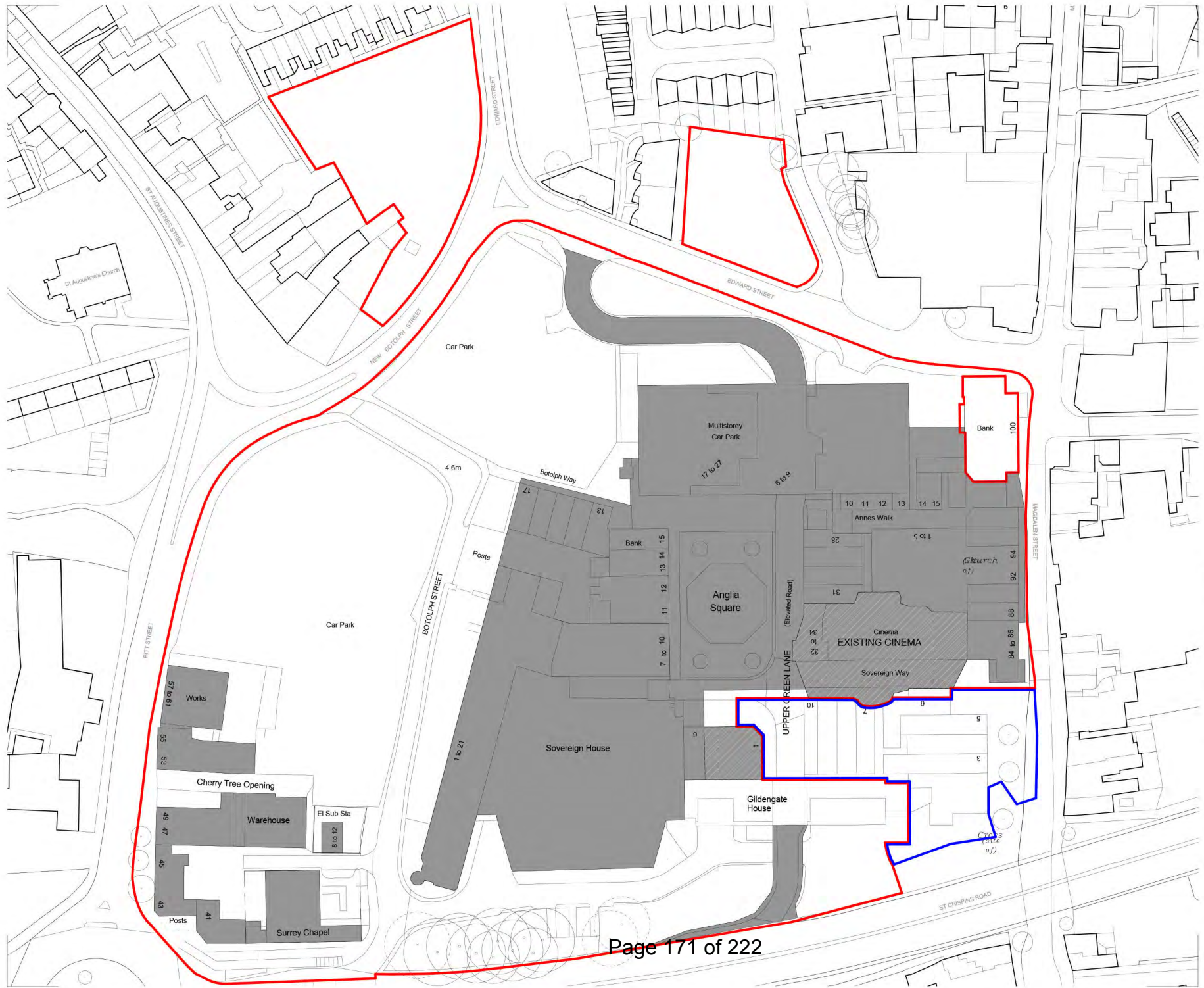
| No. | Description | Date |
|-----|-------------|------|
| | | |

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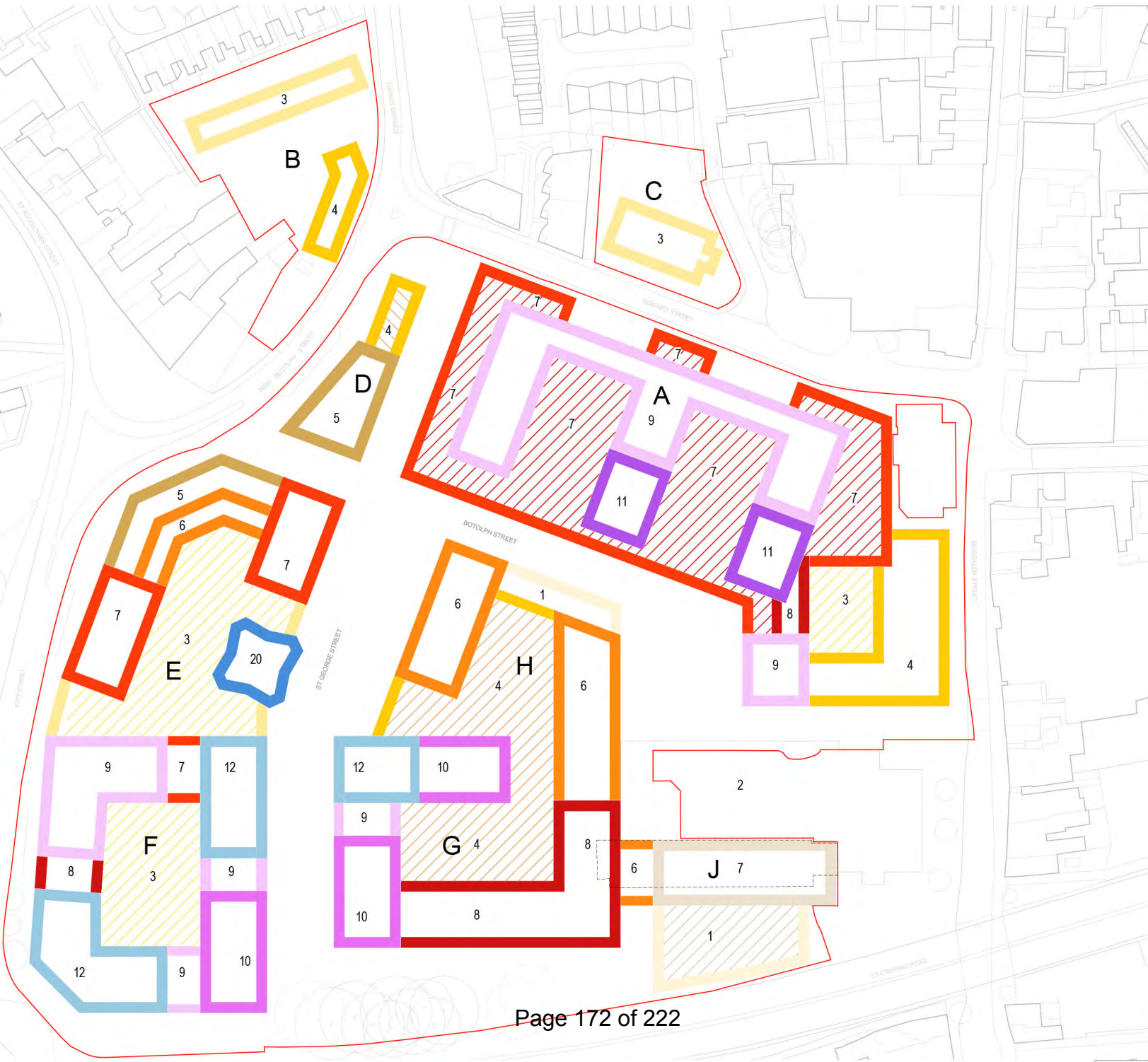
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Client
Weston Homes
 Project
Anglia Square
 Description
02-Site Layouts
Existing Buildings Demolition Plan

Status
ISSUED FOR PLANNING
 Scale
 1: 500 @A1
 Job number
 31467
 Drawing number
 A02-P2-201
 Drawn
 JP
 Date
 01.03.18
 Revision



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KEY

| | | |
|-----------|----------------------------|-----------------------------|
| 1 Storey | 9 Storey | 1 Storey Amenity |
| 3 Storeys | 10 Storeys | 3 Storey Podium Amenity |
| 4 Storeys | 11 Storeys | 4 Storey Podium Amenity |
| 5 Storeys | 12 Storeys | 4 Storey Roof Level Amenity |
| 6 Storeys | 20 Storeys | 7 Storey Podium Amenity |
| 7 Storeys | To match Existing 7 Storey | |

- All building heights are maximum storeys from top of pavement
- All building storey numbers include the ground floor
- Except Block A, any roof top projections should be limited to no more than 2m above roof level. This may include mechanical equipment, lift overruns, ventilation shafts/flues
- Block A mechanical ventilation plant, serving the carpark, will be 2.5m high above roof level



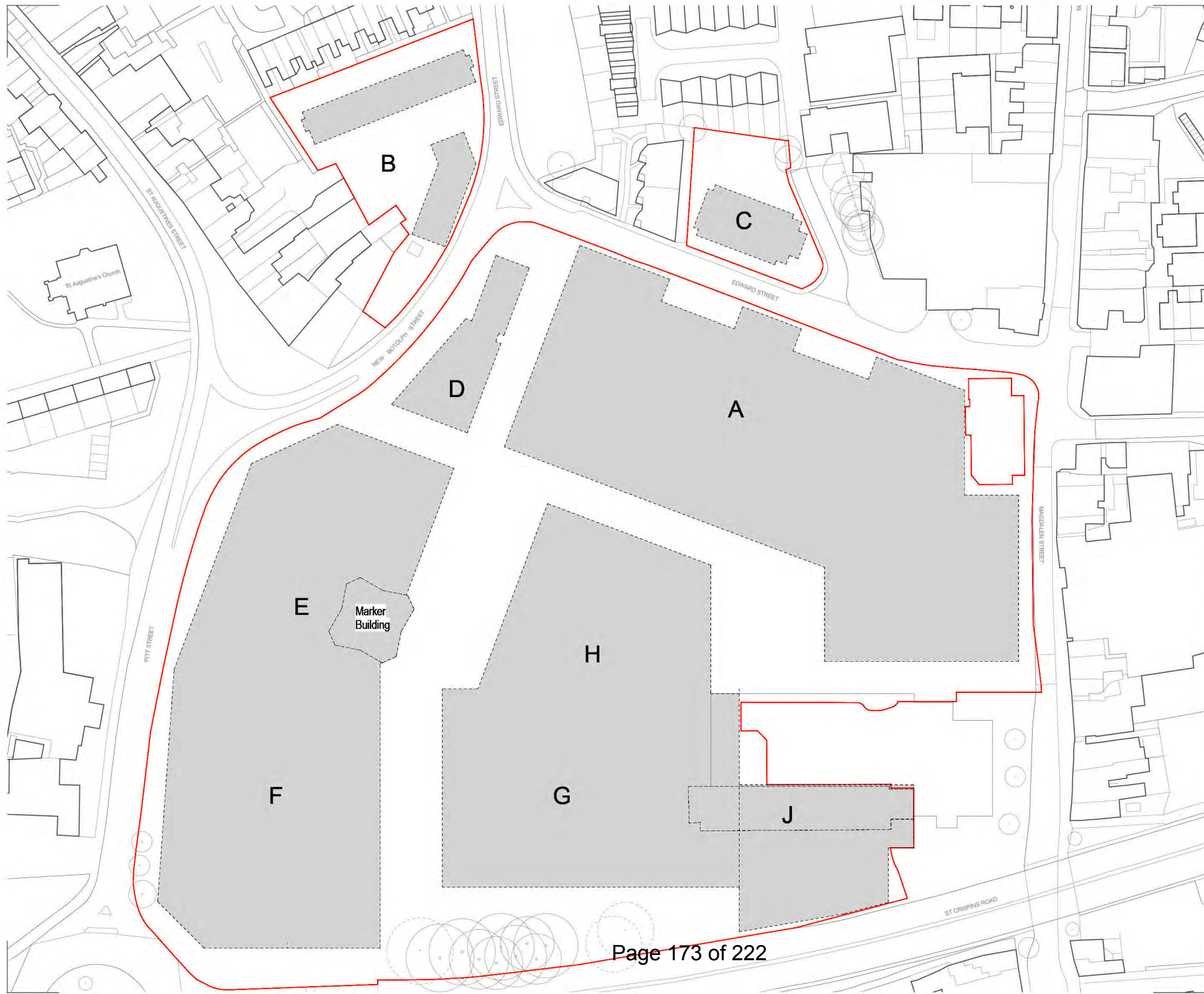
| No. | Description | Date |
|-----|-------------------------|----------|
| A | Tower footprint revised | 16.07.18 |

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Client
Weston Homes
 Project
**Anglia Square
 Norwich**
 Description
**01-Parameter Plans
 Architecture
 Proposed Building Heights**

Status
ISSUED FOR PLANNING
 Scale
 1 : 500 @A1
 Job number
 31467
 Drawing number
 AD1-PP-100
 Drawn
 AZ
 Date
 01.03.18
 Revision
 A
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- KEY**
- Footprint of Development zones
 - Development zones (excludes balcony and canopy zones).
Footprints shown are based on +/- 1.0m
 - Site B - Area 0.27 ha
 - Site C - Area 0.13 ha
 - Detailed element (Block A, Marker building within Block E, and public realm - Area 1.78ha
 - Outline element (Blocks D-J excluding public realm in detailed element - Area 2.33ha
 - Site J: retained Gildengale building to be extended, re-clad and converted for Residential Use



| No. | Description | Date |
|-----|-------------------------|----------|
| A | Tower footprint revised | 16.07.18 |

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Client
Weston Homes

Project
**Anglia Square
 Norwich**

Description
**01-Parameter Plans
 Architecture
 Development Parcel**

Status
ISSUED FOR PLANNING

Scale
 1: 500 @A1

Job number
 31467

Drawing number
 AD1-PP-400

Drawn
 AZ

Date
 01.03.18

Revision
 A

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- KEY**
- Residential
 - Residential Entrances to be integrated within commercial frontage zones
 - Commercial and Non Residential Institution Floor Space. Use Class A1 - A4 / D1 / bookmaker / nail bar (Sui Generis). Areas defined in the Retail Strategy Report Revision 1
 - Commercial and Non Residential Institution Floor Space. Use Class A1 - A4 / B1 / D1 / Sui Generis. Areas defined in the Retail Strategy Report Revision 1
 - Commercial and Non Residential Institution Floor Space. Use Class A1 - A4 / B1 / D1. Areas defined in the Retail Strategy Report Revision 1
 - Place of Worship.
 - Associated Ancillary support spaces
 - Car Park
 - Use Class D2 - Cinema
 - Hotel (C1)
 - Service Yard



Existing Building (J) - Gildengate House - to be converted to residential

Double colour bands represent alternative potential uses. Color coded as per legend above

15% of ground floor frontage use can deviate from assigned use class, and be replaced with any other permitted use in the masterplan, subject to the approval of the local authority.

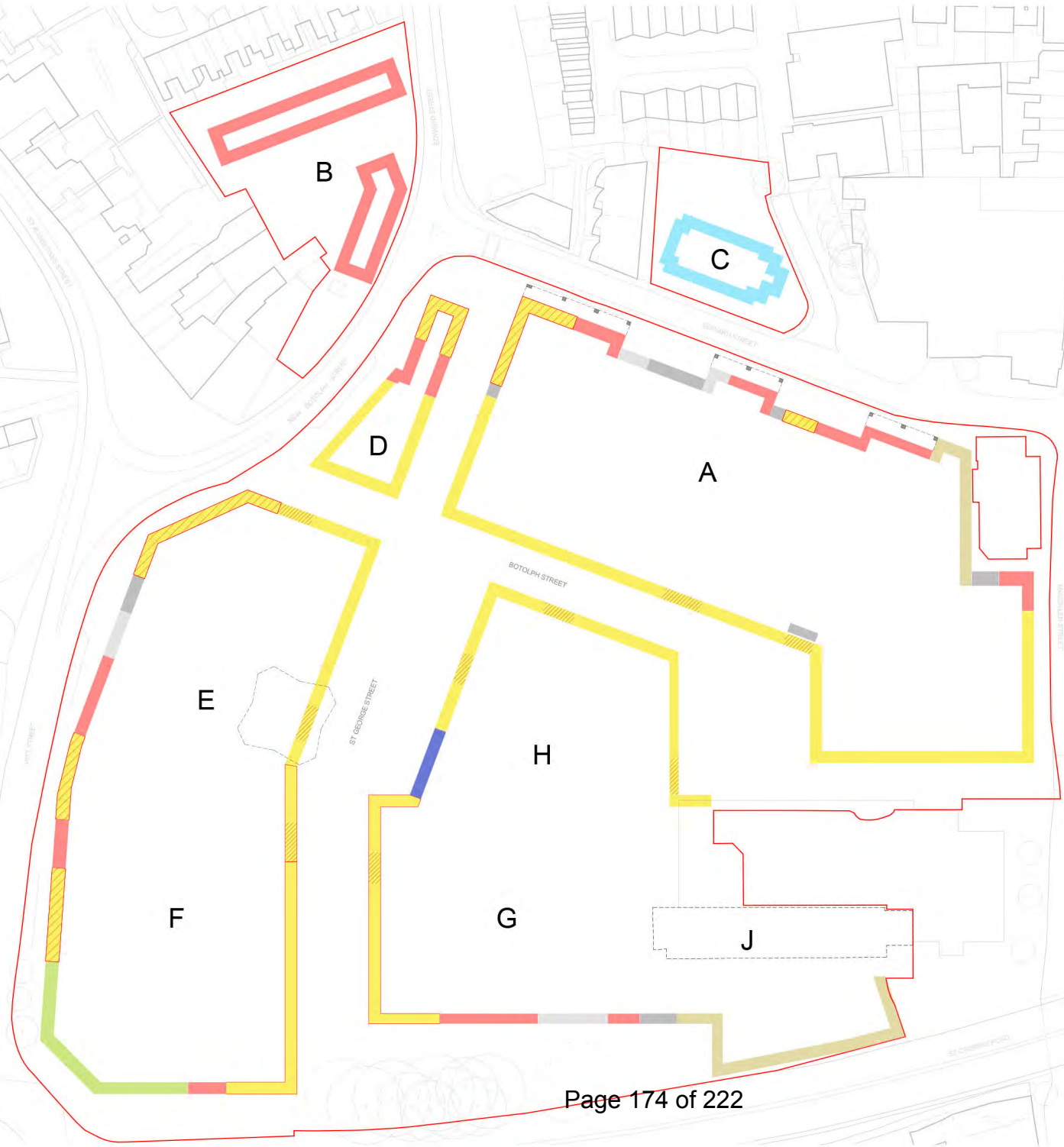
Scale Bar (1:500):

| No. | Description | Date |
|-----|-------------------------|----------|
| A | Tower footprint revised | 16.07.18 |

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Client
Weston Homes
 Project
**Anglia Square
 Norwich**
 Description
**01-Parameter Plans
 Architecture
 Land Use - Ground Floor**

Status
ISSUED FOR PLANNING
 Scale
 1: 500 @A1
 Job number
 31467
 Drawing number
 AD1-PP-200
 Drawn
 AZ
 Date
 01.03.18
 Revision
 A



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- KEY**
- Residential
 - Residential Entrances to be integrated within commercial frontage zones
 - Commercial and Non Residential Institution Floor Space. Use Class A1 - A4 / D1 / bookmaker / nail bar (Su Geners). Areas defined in the Retail Strategy Report Revision 1
 - Commercial and Non Residential Institution Floor Space. Use Class A1 - A4 / B1 / D1 / Su Geners. Areas defined in the Retail Strategy Report Revision 1
 - Commercial and Non Residential Institution Floor Space. Use Class A1 - A4 / B1 / D1. Areas defined in the Retail Strategy Report Revision 1
 - Place of Worship.
 - Associated Ancillary support spaces
 - Car Park
 - Use Class D2 - Cinema
 - Hotel (C1)
 - Service Yard
 - Existing Building (J) - Gldengate House - to be converted to residential
 - Double colour bands represent alternative potential uses. Color coded as per legend above



| No. | Description | Date |
|-----|-------------------------|----------|
| A | Tower footprint revised | 16.07.18 |

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Client
Weston Homes
 Project
**Anglia Square
 Norwich**
 Description
**01-Parameter Plans
 Architecture
 Land Use - First Floor**

Status
ISSUED FOR PLANNING
 Scale
 1 : 500 @A1
 Job number
 31467
 Drawing number
 AD1-PP-201
 Drawn
 AZ
 Date
 01.03.18
 Revision
 A

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- KEY**
- Pedestrian and Cycle access
 - Site Entrance/Exit Pedestrian and Vehicular
 - Pedestrian, Cycle and Vehicular access for service and emergency
 - Car Park Entrance/Exit - Vehicular
 - Car Park & Public Conveniences Entrance/Exit - Pedestrian
 - Service Yard Entrance
 - New Vehicular Access to existing service yard



| No. | Description | Date |
|-----|-------------------------|----------|
| A | Tower footprint revised | 16.07.18 |

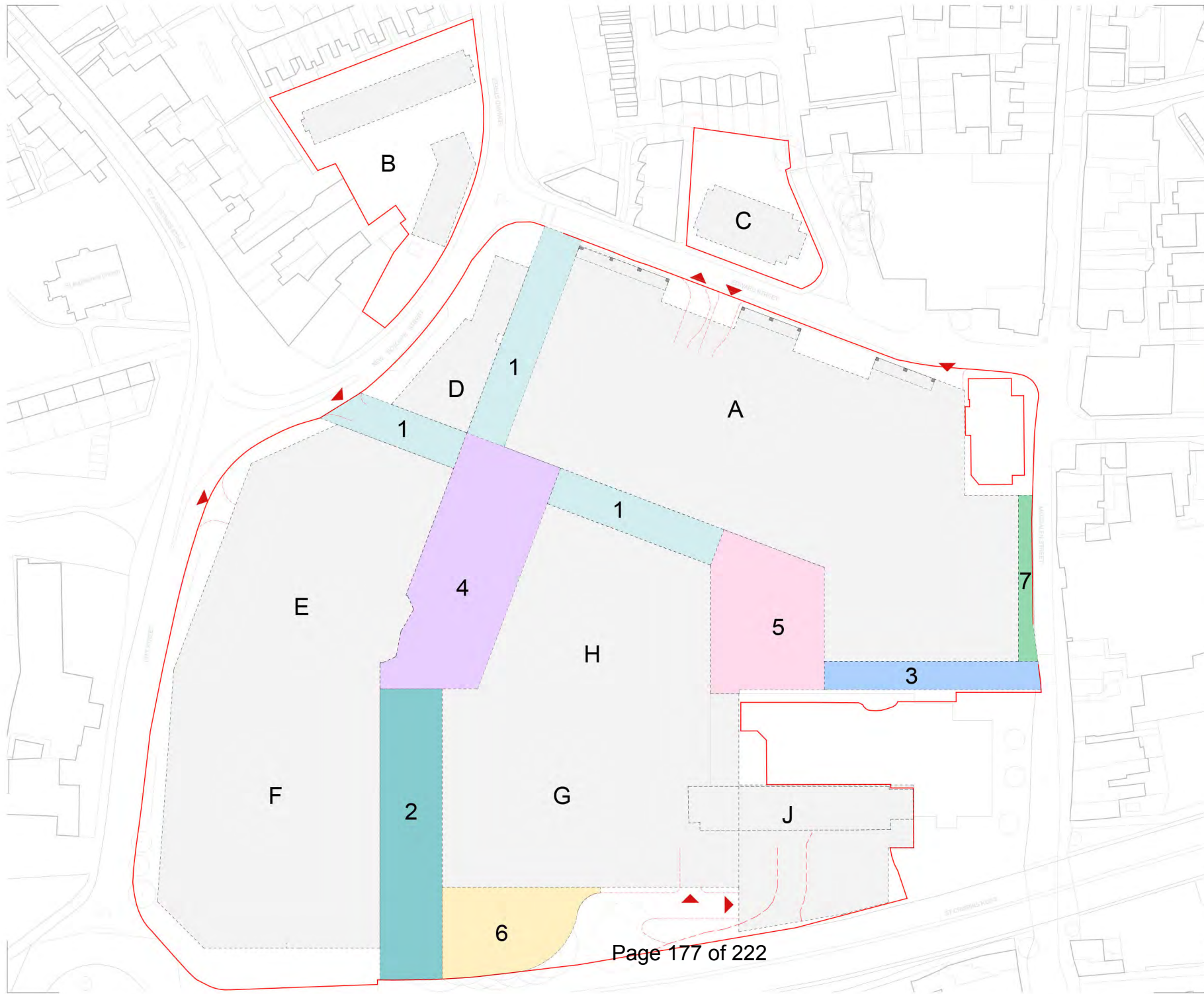
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Client
Weston Homes
 Project
**Anglia Square
 Norwich**
 Description
**01-Parameter Plans
 Architecture
 Access**

Status
ISSUED FOR PLANNING
 Scale
 1 : 500 @A1
 Job number
 31467
 Drawing number
 AD1-PP-300
 Drawn
 AZ
 Date
 01.03.18
 Revision
 A

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- KEY**
- Development zones, exclude balconies and canopies zones
Footprints shown based on +/- 1m
 - 1) 10-11 metres wide
 - 2) 16-18 metres wide
 - 3) 30 metres wide
 - 4) Up to 29m x 73m
 - 5) Up to 33m x 46m
 - 6) 26 metres wide
 - 7) 4.1m - 4.8m wide
 - Proposed vehicular access
- Dimensions stated are between building frontages



| No. | Description | Date |
|-----|-------------------------|----------|
| A | Tower footprint revised | 16.07.18 |

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Client
Weston Homes

Project
**Anglia Square
 Norwich**

Description
**01-Parameter Plans
 Architecture
 Public Realm**

Status
ISSUED FOR PLANNING

Scale
 1 : 500 @A1

Job number
 31467

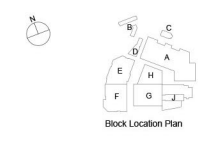
Drawing number
 AD1-PP-500

Drawn
 AZ

Date
 01.03.18

Revision
 A

Original size 100mm@A1 Copyright Broadway Malyan Limited



Note:
 Floor levels between car parking and residential do not align. Refer to building section A04-P2-A-001. The typical plans provide residential levels only.
 For car parking floor levels refer to section heights.

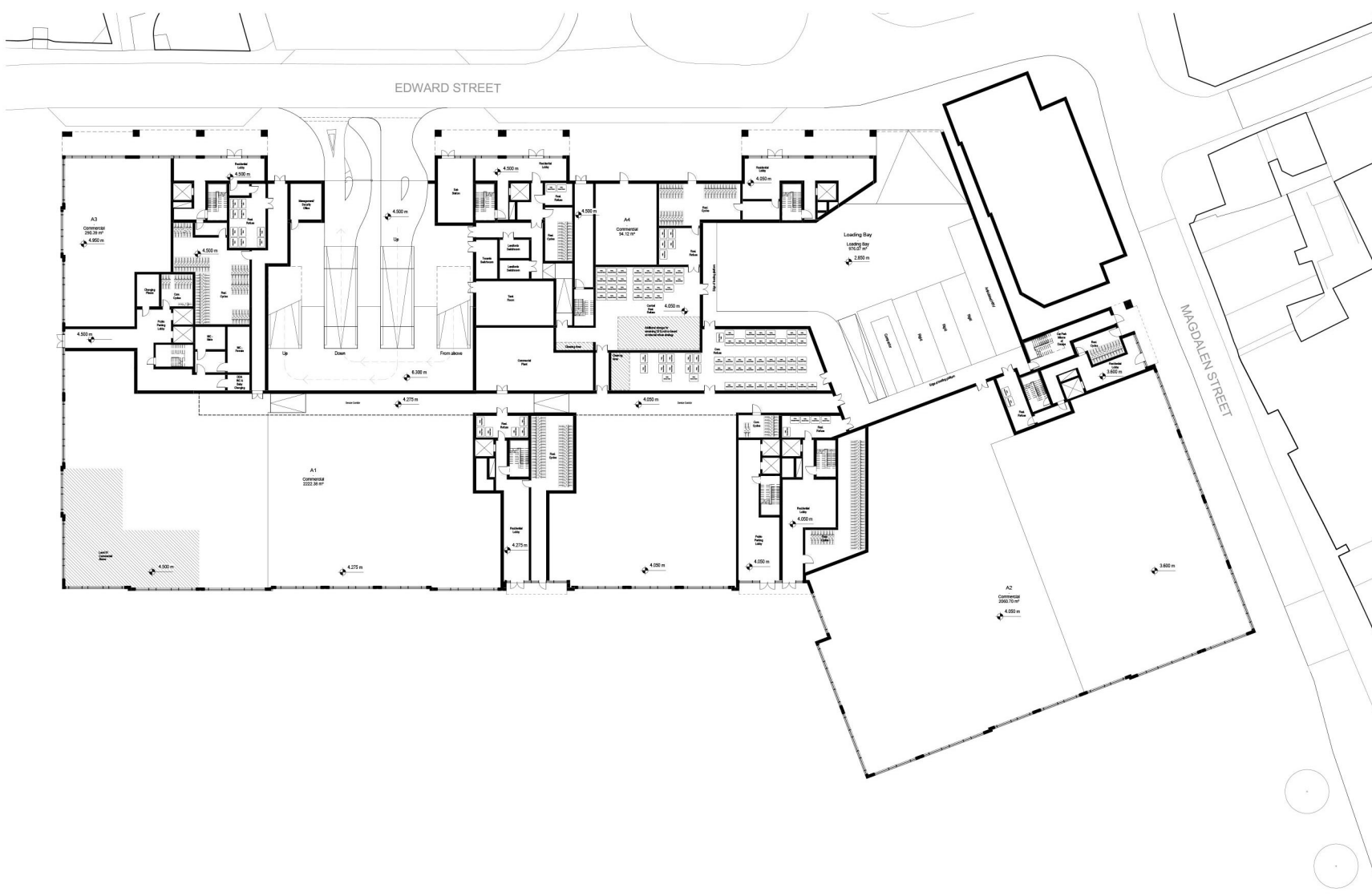


| No. | Description | Date |
|-----|---|----------|
| A | Public WC's & changing places facility added; articulation to west facade, com. cycle stores jammed, single lane vehicular entrance, Magdalen Street entrance amended | 16.07.18 |

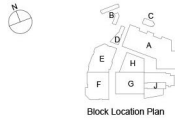
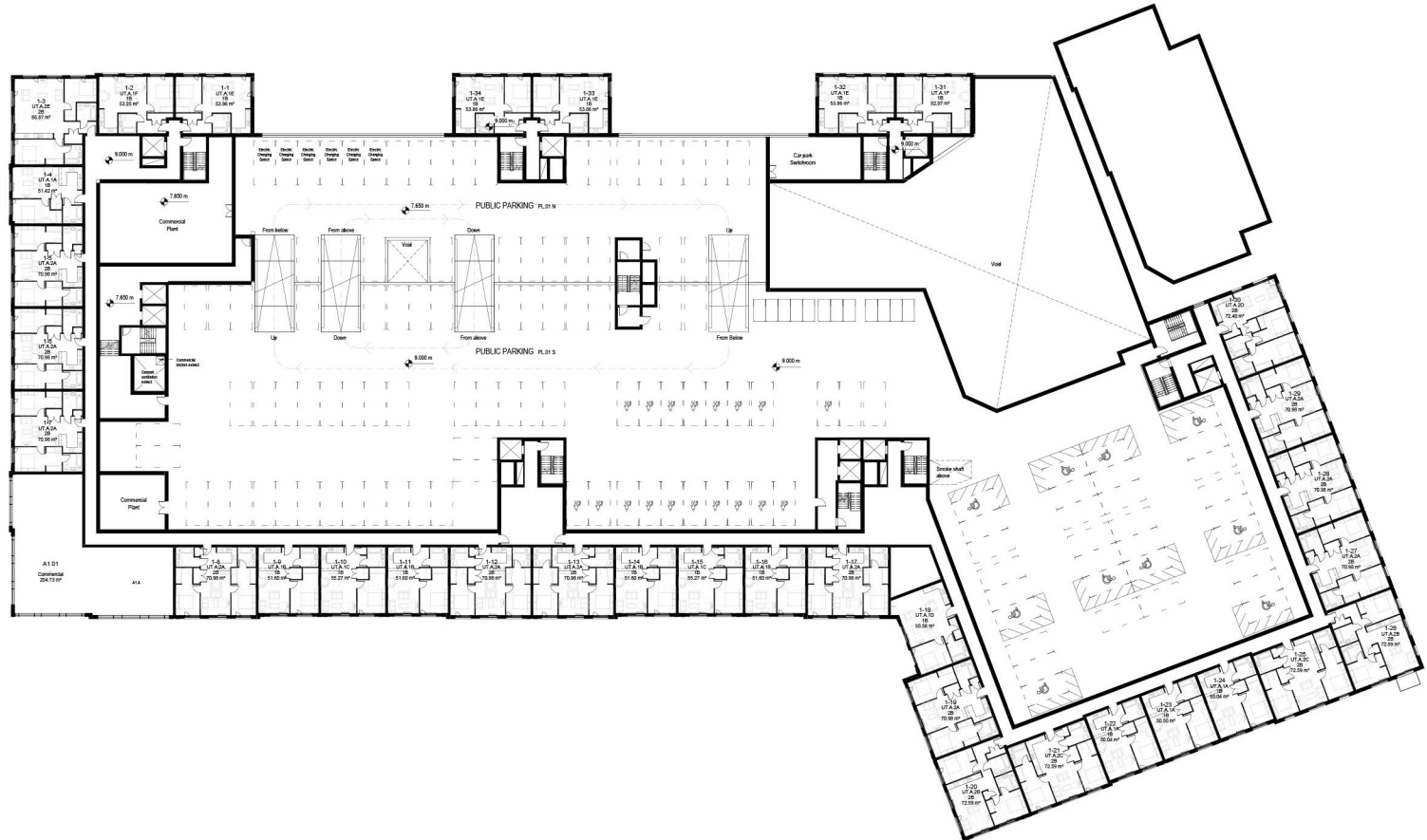
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Client
 Weston Homes
 Project
 Anglia Square
 Description
 GA Plans
 Block A
 Ground Floor

Status
 WORK IN PROGRESS
 Scale
 As Indicated @ A0
 Job Number
 31467
 Drawing Number
 A03-P2-A-000
 Date
 01.03.18
 Revision
 A
 Original size 110mmx90mm
 Copyright Broadway Malyan Limited



1 Ground Floor Plan
 1:200



Note:
 Floor levels between car parking and residential do not align. Refer to building section A03-P2-A-001.
 The typical floors are not residential levels only.
 For car parking floor levels refer to spot heights.



| No. | Description | Date |
|-----|---|----------|
| A | Articulation to west facade, reduced window sizes along Magdalen Street & corner with Sovereign Way | 16.07.18 |

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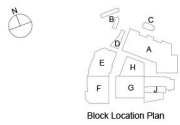
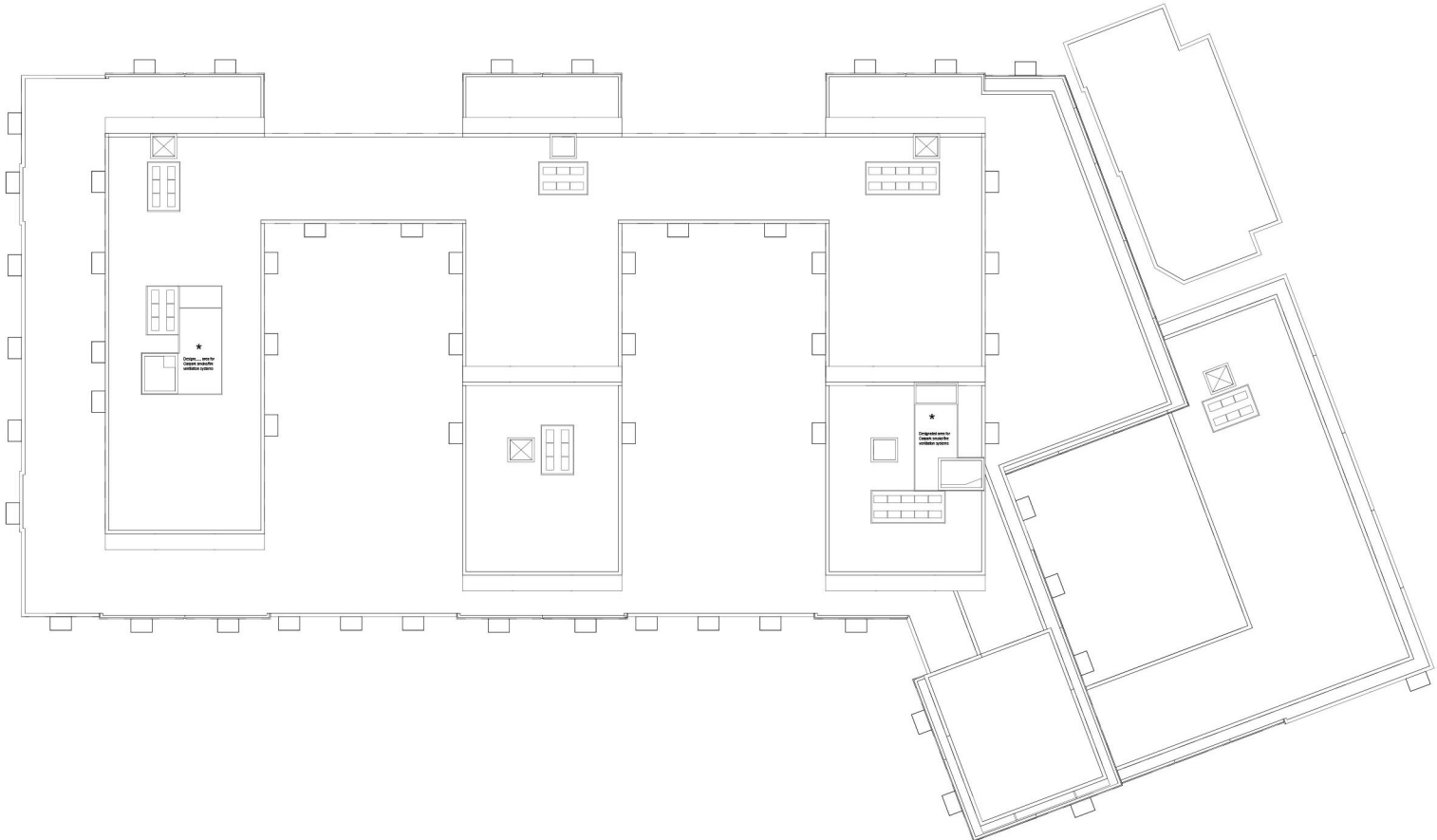
Client
 Weston Homes
 Project
 Anglia Square
 Description
 GA Plans
 Block A
 First Floor

Issue
 ISSUED FOR PLANNING
 Drawn
 AS Indicated@AD
 Job number
 31467
 Original size
 100mm@0

Checked
 JP
 Revision
 A
 Date
 01.03.18

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1 First Floor
 1:200



Note:
 Floor levels between car parking and residential do not apply. Refer to
 building section A03-P2-A-011. The layout plans are for residential
 levels only.
 For car parking floor levels refer to spot heights.

1 Roof Level
 1:200

LEGEND - ROOF PLANT

Small Condenser Compound
 Large Condenser Compound

Maximum height of enclosure + plant
 will not exceed 2.0m above roof
 level
 * Car Park Smoke Ventilation:
 maximum height of plant enclosure
 will not exceed 2.5m above roof
 level

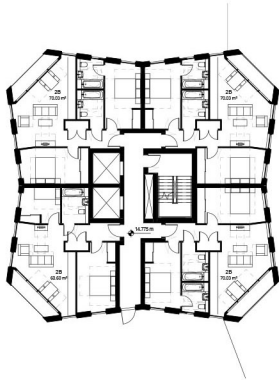
Scale Bar (1:200):

| No. | Description | Date |
|-----|-----------------------------|----------|
| A | Plant & lift overruns added | 16.07.18 |

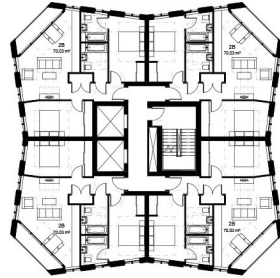
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Client
 Weston Homes
 Project
 Anglia Square
 Description
 GA Plans
 Block A
 Roof Level

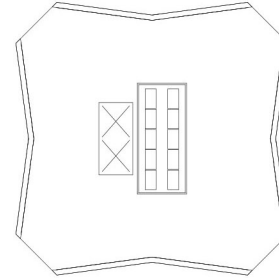
Issue
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 Scale
 As Indicated AD
 Job number
 31467
 Drawing number
 A03-P2-A-011
 Date
 01.03.18
 Author
 JP
 Revision
 A



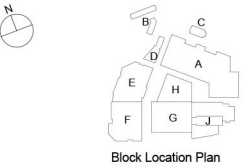
4 Third Floor
1 : 200



5 Typical Floor
1 : 200



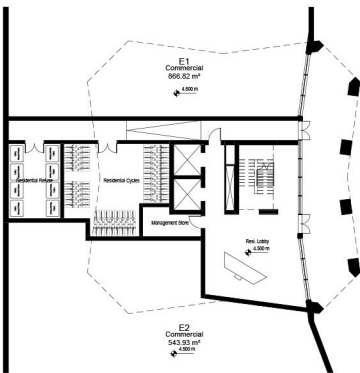
6 Roof Level
1 : 200



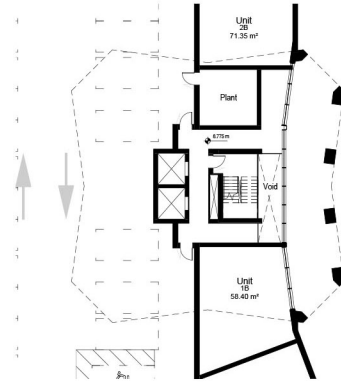
LEGEND - ROOF PLANT

- Small Condenser Compound
- Large Condenser Compound

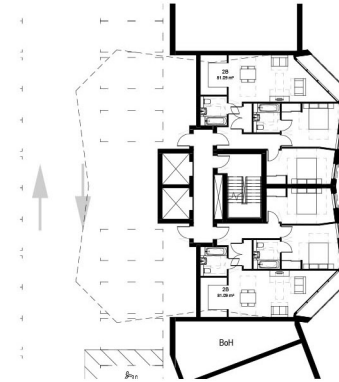
Maximum height of enclosure + plant will not exceed 2.0m above roof level



1 Ground Floor
1 : 200



2 First Floor
1 : 200



3 Second Floor
1 : 200



| No. | Description | Date |
|-----|--|----------|
| A | Tower footprint amended & height reduced from 25 to 20 storeys, plant & lift overruns added, material colours & balcony typologies amended | 16.07.18 |

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Client
Weston Homes

Project
Anglia Square

Description
**GA Plans
 Block E
 Tower**

Status
ISSUED FOR PLANNING

Scale
 As indicated @A1

Drawn
 BM

Date
 01.03.18

Job number
 31467

Drawing number
 A03-P2-E-000

Revision
 A



1 Elevation 01
1:200

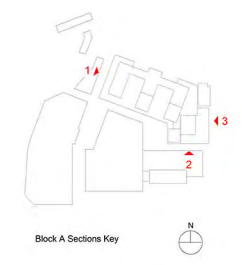


2 Elevation 02
1:200



3 Elevation 03
1:200

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Block A Sections Key

Elevation Material key

- 1. Brick cladding - Dark red, dark & pale colour and type to complement existing context
- 2. Brick feature banding expresses grouping and parapet edges
- 3. Dark grey or gold coloured framed window system
- 4. Shop fronts are 'illustrative information only', but with fascia panel on Magdalen Street Return. Shopfronts will be provided by retail operators and their design guided by a 'Shopfront Design Guide' included as part of the application documents.
- 5. Balconies - balustrade designs comprising perforated metal, glass or railings subject to location and character area
- 6. Light weight cladding
- 7. Textured Brick
- 8. Perforated Panel

Scale Bar (1:200)

| No. | Description | Date |
|-----|--|----------|
| A | Plant & lift covers addic, material colours & balcony typologies amended | 16.07.18 |

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Client
 Weston Homes
 Project
 Anglia Square
 Description
 05-Elevation
 Architecture
 Block A - Elevations 01, 02 & 03

Scale
 ISSUED FOR PLANNING

| Scale | Drawn | Check |
|---------------------|--------------------------------|---------------|
| As indicated @ A0 | BM | 01.03.18 |
| Job number 31467 | Drawing number A05-P2-A-001 | Revision A |

Original size 100mm @ A0 Copyright Broadway Malyan Limited



1 Elevation 04
1:200



2 Elevation 05
1:200



3 Elevation 06
1:200

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Block A Sections Key

Elevation Material key

1. Brick cladding. Dark red, dark & pale colour and type to complement existing context
2. Brick feature banding expresses grouping and parapet edges
3. Dark grey or gold coloured framed window system
4. Shop fronts are illustrative information only, but with fascia panel on Magdalen Street Return. Shopfronts will be provided by retail operators and their design guided by a 'Shopfront Design Guide' included as part of the application documents.
5. Balconies - balustrade designs comprising perforated metal, glass or railings subject to location and character area
6. Light weight cladding
7. Textured Brick
8. Perforated Panel

Scale Bar (1:200)

| No. | Description | Date |
|-----|---|----------|
| A | Plant & lift covers added, material colours & balcony typologies amended (Elevation 04, Articulation to car park shading. Square elements added above projecting residential elements at Level 01-10) | 16.07.18 |

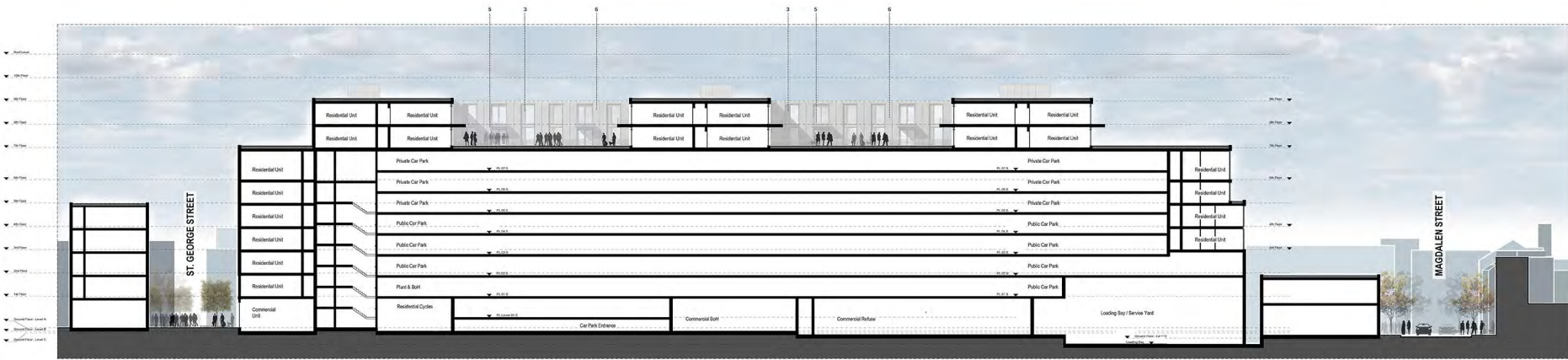
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 E info@broadwaymalyan.com
 www.broadwaymalyan.com

Client
 Weston Homes
 Project
 Anglia Square
 Description
 05-Elevation
 Architecture
 Block A - Elevations 04, 05 & 06

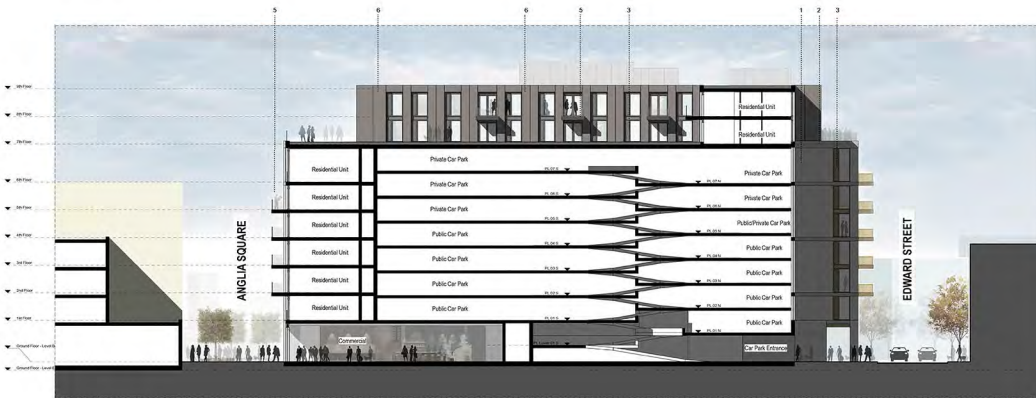
Scale
 ISSUED FOR PLANNING

| Scale | Drawn | Date |
|-----------------|----------------|----------|
| As indicated@AD | BM | 01.03.18 |
| Job number | Drawing number | Revision |
| 31467 | A05-P2-A-002 | A |

Original size 100mm@A0 Copyright Broadway Malyan Limited



1 Section 01
1:200



2 Section 02
1:200



3 Section 03
1:200

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 It is not intended to be used for any other purpose.



Block A Sections Key

- Elevation Material key
1. Brick cladding. Dark red, dark & pale colour and type to complement existing context.
 2. Brick feature banding expresses grouping and parapet edges.
 3. Dark grey or gold coloured framed window system.
 4. Shop fronts are 'illustrative information only', but with fascia panel on Magdalen Street Return. Shopfronts will be provided by retail operators and their design guided by a 'Shopfront Design Guide' included as part of the application documents.
 5. Balconies - balustrade designs comprising perforated metal, glass or railings subject to location and character area.
 6. Light weight cladding.
 7. Textured Brick.
 8. Perforated Panel.

Scale Bar (1:200)

| No. | Description | Date |
|-----|--|----------|
| A | Plant & lift overruns added, material colours & balcony typologies amended | 16.07.18 |

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Client
 Weston Homes
 Project
 Anglia Square
 Description
 04-Sections
 Architecture
 Block A - Section 01, 02 & 03

Scale
 ISSUED FOR PLANNING

| Scale | Drawn | Date |
|-------------------|-------|----------|
| As Indicated @ A0 | JP | 01.03.18 |

| Job number | Drawing number | Revision |
|------------|----------------|----------|
| 31467 | A04-P2-A-001 | A |

Original size 100mm @ A0 Copyright Broadway Malyan Limited



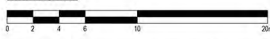
Block E Sections Key



Elevation Material key

1. Brick cladding - Dark red, dark & pale colour and type to complement existing context
2. Brick feature banding expresses grouping and parapet edges
3. Dark grey or gold coloured framed window system
4. Shop fronts are 'illustrative information only'. Shopfronts will be provided by retail operators and their design guided by a 'Shopfront Design Guide' included as part of the application documents.
5. Balconies - balustrade designs comprising perforated metal, glass or railings subject to location and character area
6. Light weight cladding

Scale Bar (1:200)



| No. | Description | Date |
|-----|--|----------|
| A | Tower footprint amended & height reduced from 25 to 20 storeys, plant & lift overruns added, material colours & balcony typologies amended | 16.07.18 |

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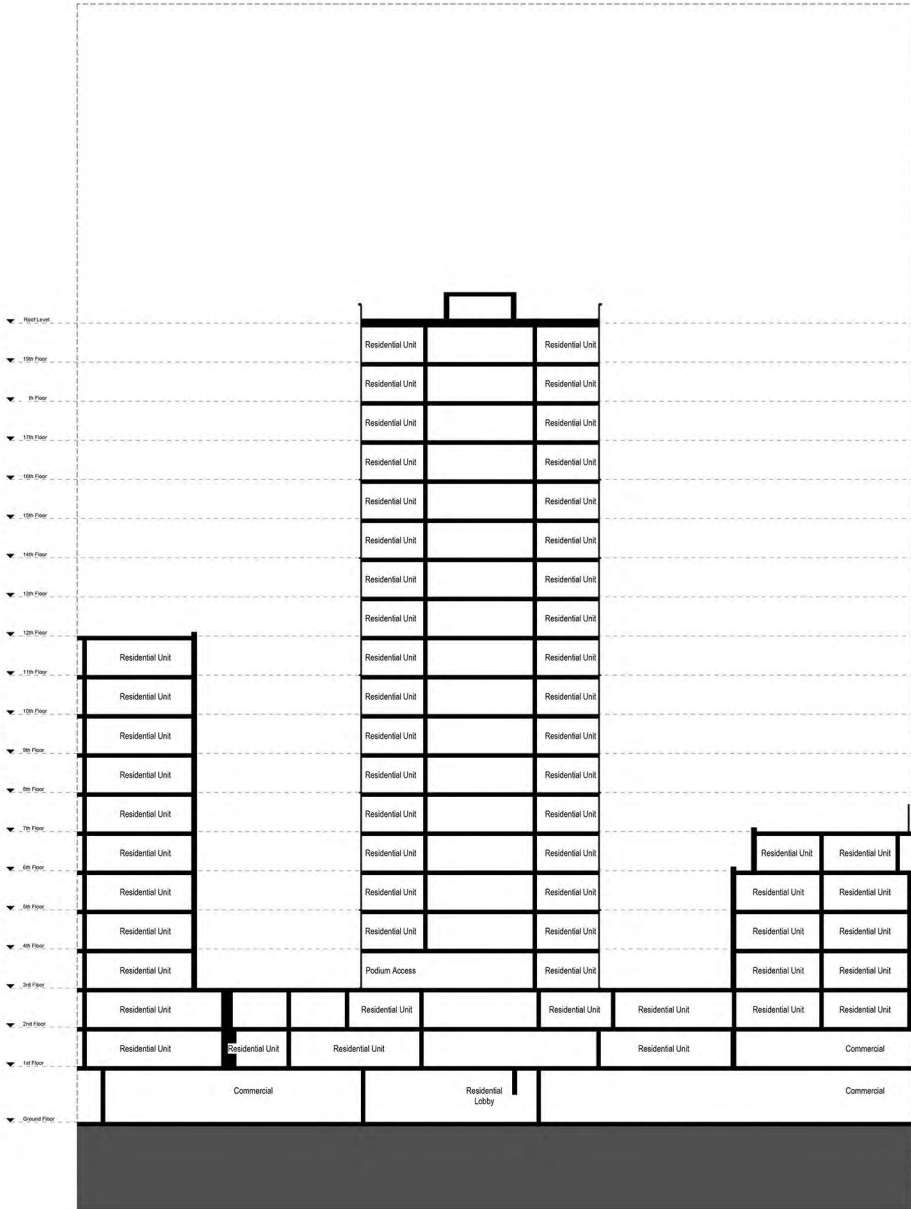
Client
Weston Homes
 Project
Anglia Square

Description
**05-Elevation
 Architecture
 Tower - Elevation 01 & Section 01**

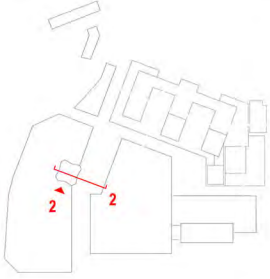
Status
ISSUED FOR PLANNING
 Scale
 1 : 200 @A1 BM 01.03.18
 Job number
 31467 Drawing number
 A05-P2-E-001 Revision
 A



1 Elevation 01
 1 : 200



2 Section 01
 1 : 200



Block E Sections Key

- Elevation Material key
1. Brick cladding - Dark red, dark & pale colour and type to complement existing context
 2. Brick feature banding expresses grouping and parapet edges
 3. Dark grey or gold coloured framed window system
 4. Shop fronts are 'illustrative information only'. Shopfronts will be provided by retail operators and their design guided by a 'Shopfront Design Guide' included as part of the application documents.
 5. Balconies - balustrade designs comprising perforated metal, glass or railings subject to location and character area
 6. Light weight cladding



| No. | Description | Date |
|-----|--|----------|
| A | Tower footprint amended & height reduced from 25 to 20 storeys, plant & lift overruns added, material colours & balcony typologies amended | 16.07.18 |

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www.BroadwayMalyan.com

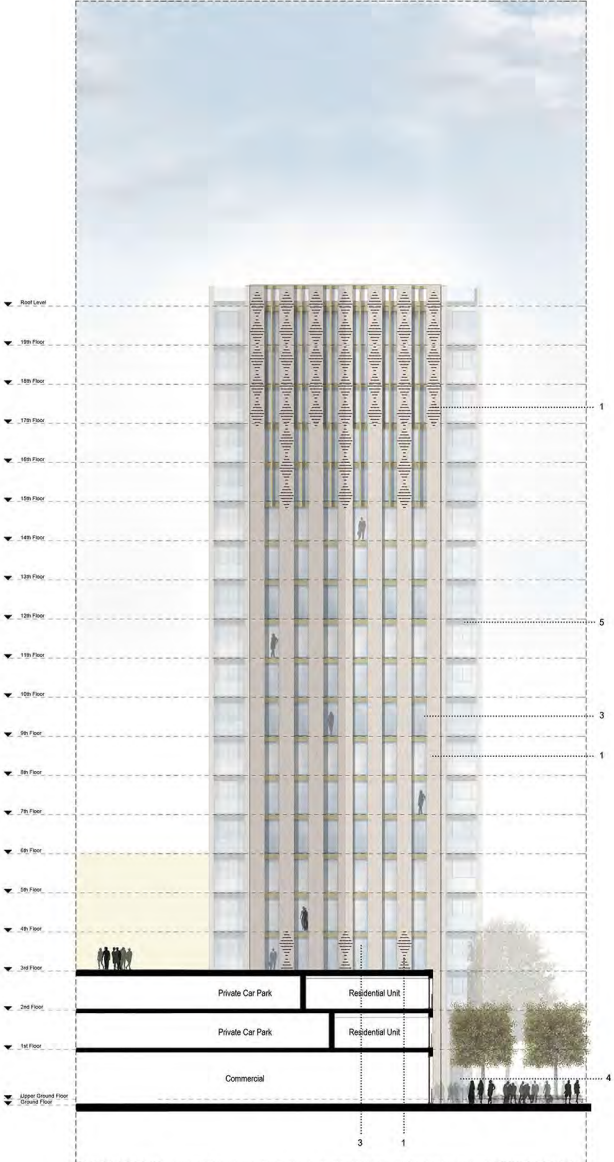
Client
Weston Homes

Project
Anglia Square

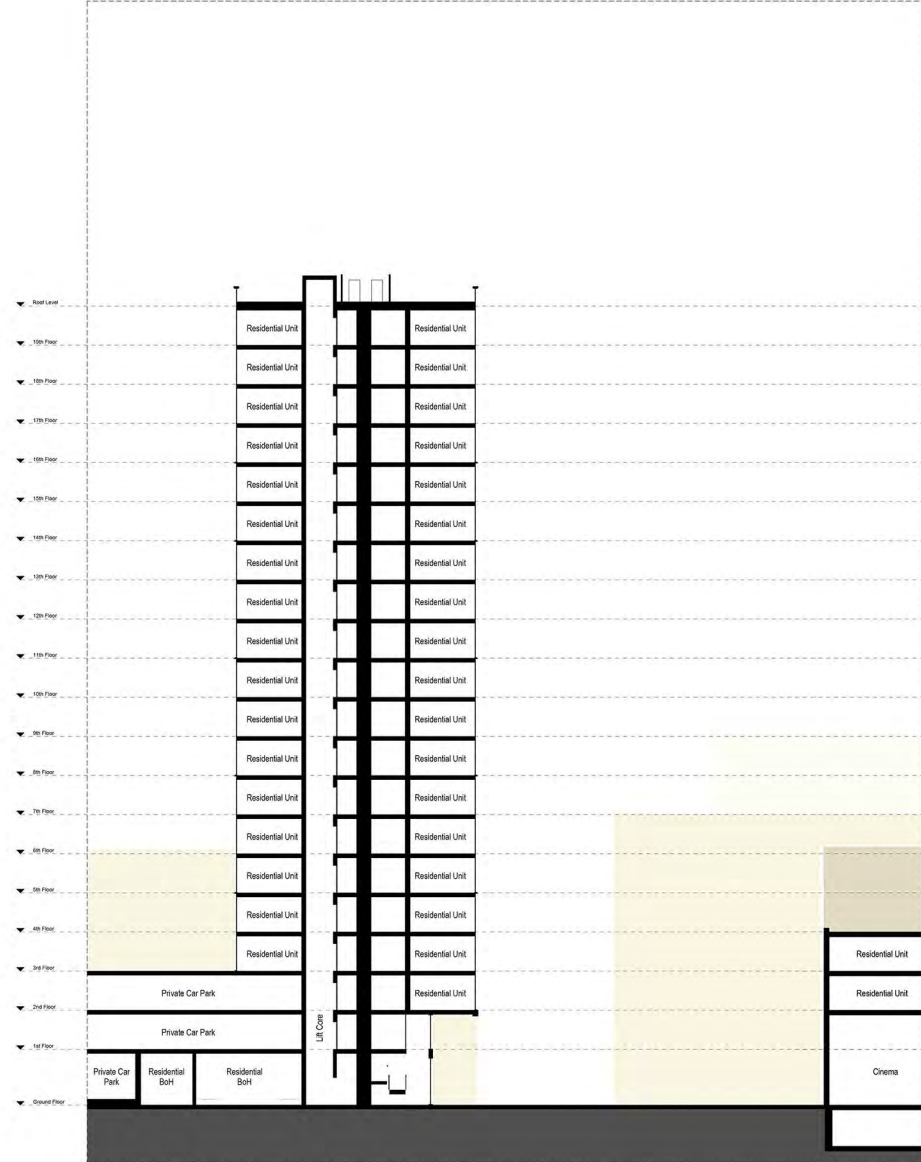
Description
**05-Elevation
 Architecture
 Tower - Elevation 02 & Section 02**

Status
ISSUED FOR PLANNING

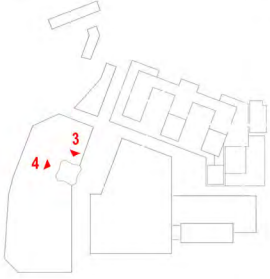
| Scale | Drawn | Date |
|------------|----------------|-------------|
| 1 : 200 | @A1 | BM 01.03.18 |
| Job number | Drawing number | Revision |
| 31467 | A05-P2-E-002 | A |



1 Elevation 02
 1 : 200



2 Section 02
 1 : 200



Block E Sections Key

- Elevation Material key
1. Brick cladding - Dark red, dark & pale colour and type to complement existing context
 2. Brick feature banding expresses grouping and parapet edges
 3. Dark grey or gold coloured framed window system
 4. Shop fronts are 'illustrative information only'. Shopfronts will be provided by retail operators and their design guided by a 'Shopfront Design Guide' included as part of the application documents.
 5. Balconies - balustrade designs comprising perforated metal, glass or railings subject to location and character area
 6. Light weight cladding



| A | Tower footprint amended & height reduced from 25 to 20 storeys, plant & lift overruns added, material colours & balcony typologies amended | 16.07.18 |
|-----|--|----------|
| No. | Description | Date |

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Client
Weston Homes

Project
Anglia Square

Description
**05-Elevation
 Architecture
 Tower - Elevation 03 & 04**

Status
ISSUED FOR PLANNING

Scale
 1 : 200

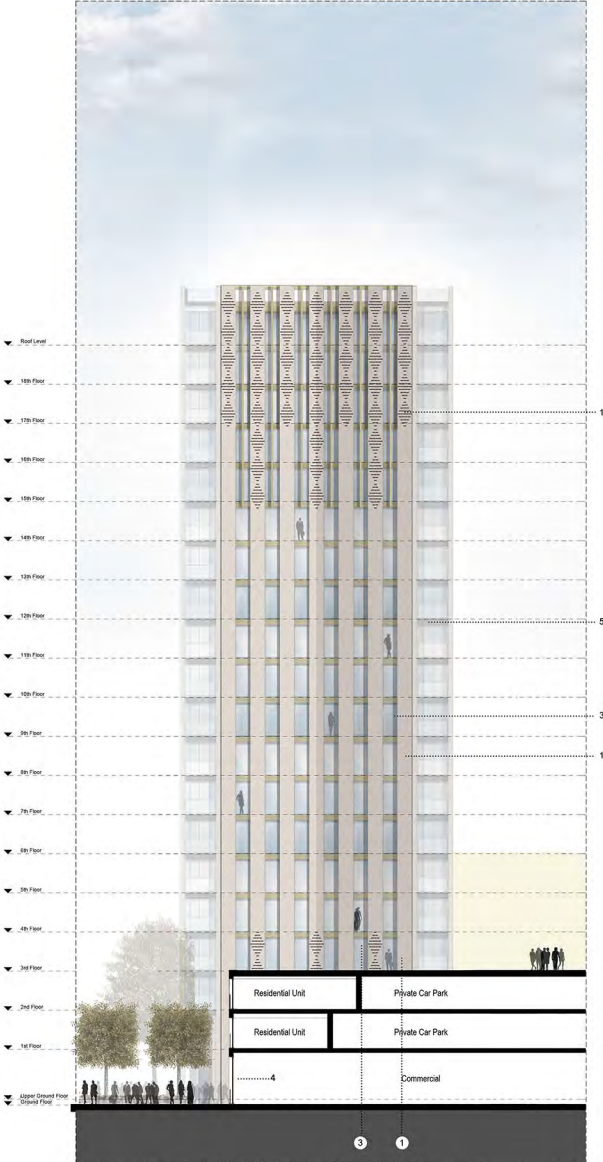
Job number
 31467

Drawing number
 A05-P2-E-003

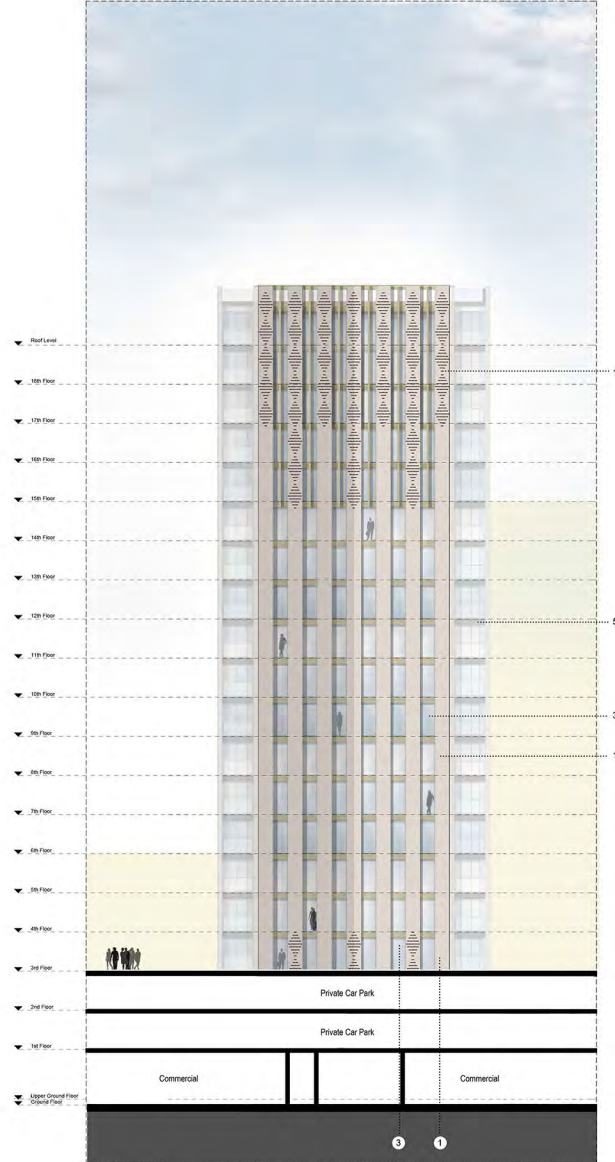
Drawn
 BM

Date
 01.03.18

Revision
 A



1 Elevation 03
 1 : 200



2 Elevation 04
 1 : 200



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7. Date of consultation and any log to be signed on site.

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| 03/10/2018 | Approved Scheme | SH | RF |
| 02/07/2018 | Updated Layout | HS | DF |
| 01/08/2018 | Updated Layout | SH | DF |
| Issue | Date | Status | Drawn/Approved |

PIE Plant Intelligent Environments LLP
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Client: Weston Homes Plc.
 Project: Anglia Square, Norwich

Log Title: Landscape General Arrangement

| | | |
|---------------|------------|-------------|
| Created on | Created by | Approved by |
| 08.11.16 | SB | JH |
| Scale | Size | Status |
| 1:500 | A0 | PLANNING |
| PL1581-GA-001 | | 03 |



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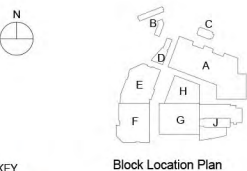
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6. Date of construction and with it to be signed on site.

| Date | Issue | Status | Drawn | Approved |
|-------------|-----------------|--------|-------|----------|
| 04.27.07.18 | Approved Scheme | SH | DF | |
| 03.27.02.18 | Updated Layout | SH | DF | |
| 02.28.02.18 | Updated Layout | SH | DF | |
| 01.23.02.18 | Updated Layout | SH | DF | |

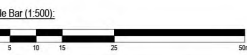
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| | Plant Intelligent Environments LLP <small>an independent company</small> | | <small>incorporated in England</small> |
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|---------------|-------------------------------|
| Client | Weston Homes Plc. |
| Project | Anglia Square, Norwich |
| Project Title | Roof Plan General Arrangement |
| Created on | 21.03.17 |
| Created by | SB |
| Approved by | JH |
| Scale | 1:500 |
| Drawn | AD |
| Status | PLANNING |
| Project No. | PL1581-GA-002 |
| Sheet No. | 04 |

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- KEY**
- Phase 1
 - Phase 2
 - Phase 3
 - Phase 4



| No. | Description | Date |
|-----|---|----------|
| A | Tower footprint and ground floor layout revised | 16.07.18 |

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Client
Weston Homes
 Project
Anglia Square
 Description
02-Site Layouts
Illustrative Phasing Strategy Plan

Status
ISSUED FOR PLANNING
 Scale
 1 : 500 @A1
 Job number
 31467
 Drawing number
 A02-P2-400
 Drawn
 JP
 Date
 01.03.18
 Revision
 A



Historic England

Ms Tracy Armitage
Norwich City Council
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NORWICH
Norfolk
NR2 1NH

Direct Dial: 01223 582721

Our ref: P00848070

30 October 2018

Dear Ms Armitage

T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990

ANGLIA SQUARE INCLUDING LAND AND BUILDINGS TO THE NORTH AND WEST, NORWICH, NORFOLK
Application No. 18/00330/F

Thank you for your letter consulting Historic England on amendments to the proposed scheme for the redevelopment of Anglia Square. This letter provides a consolidated response to the application.

1. Summary of Historic England's Position

Norwich is one of England's – and Europe's – great historic cities. Set in the valley of the River Wensum, the historic centre of Norwich can still be read as having been defined by the longest circuit of city walls in medieval England. Containing more medieval churches than any city north of Alps, large numbers of historic buildings, many of exceptional interest, and streets and spaces rich in character, the centre of Norwich is an extraordinary historic place. The heart of the city is articulated by its major landmarks. On the hills to the south of the river, stand the castle, City Hall, the Roman Catholic cathedral, and a number of the most prominent churches, including St Peter Mancroft and St Giles. Below them, near the river, is the medieval cathedral, one of the great churches of Europe, whose spire rises to form the central landmark of the city. Norwich north of the river has its own character, the streets within the circuit of the walls still rich in historic incident, but without the landmarks of the south.

Historic England consider that the proposed redevelopment of Anglia Square would severely harm the city's extraordinary historic character, damaging people's

appreciation of both the significance of the city's great monuments –the Norman castle, the medieval cathedral, the Roman Catholic cathedral, City Hall and the numerous medieval churches which support them – and that of the rich historic cityscape, formed of streets, spaces, and the historic buildings by which they are defined. That harm would be engendered by the disparity of the scale of the development as a whole, which would be foreign to the character of the city, and by the proposed tower, which, rising to 20 stories, would radically disrupt the character of the cityscape, formed as it is by the interplay of city's topography, its great monuments and the wider pattern of streets and spaces in which the latter are set.

The reduction of the tower's height from 25 to 20 stories – the principal amendment made to the scheme since its original submission – would not materially reduce its impact on Norwich's character. While it would no longer be visible from some of the places from which the original tower would have been visible it would remain a prominent and alien feature; and an additional photomontage confirms that the tower would be visible in – and damaging to – the wonderful prospect of the cathedral as it is seen from the Lower Close.

This application therefore raises fundamental questions about the future of Norwich – and indeed, about the future of all historic cities, as if so harmful a development were permitted in so special a place what protection would any historic city have against similar treatment? These questions can be boiled down to one. What should be our vision for the future of Norwich?

Historic England's response is this. Norwich is a great historic city which provides a rich and stimulating theatre for contemporary life. We know that historic places are valued for their attractiveness, provide fertile ground for creative and innovative businesses, attract tourism (a major contributor to Norwich's economy) and are wonderful places in which to live. We also know that historic places are adaptable, that they have the capacity to accommodate growth and to add to their character with fine contemporary buildings which combine modernity and a natural respect for the grain and character of their setting. Norwich can change and grow without damaging the essential character which makes the city so special.

Implicit in this application is another vision – that Norwich should subordinate its extraordinarily rich character to the supposed imperatives of a particular type of contemporary development. The proposed development alone would severely harm that character which makes Norwich so special. Were it to be built there is little reason to believe that further development of similar character would not follow in the future.

No one disputes that the failed 1960/70s development of Anglia Square harms the city, although it does provide some facilities which are highly valued by those who use them. The applicants argue that the scale of the proposed development is necessary to make the redevelopment of Anglia Square viable. We have not independently assessed their viability assessment, but we note that they have not carried out detailed exploration of alternative approaches and are sceptical of their assessment of the approach suggested by a community group as a scheme appropriate to the character of the city. We therefore question whether they have

provided a clear and convincing justification for the approach they propose and the harm it would cause.

We understand the applicants' scheme would not be viable, and would depend for its success on public subsidy comprising a grant of £12,000,000 from Homes England via the city council and exemption from contributing to the community infrastructure levy. If public subsidy of this scale is required to redevelop the site it is reasonable to ask what it might achieve if the underlying principles of the scheme were to be changed radically. Could this level of subsidy bring about a development scheme appropriate to the character of the city? We would expect public subsidy, if required, to be used to fund a scheme which would enhance the character of the city, not harm it.

In assessing the proposed redevelopment of Anglia Square Historic England's remit is both to consider the impact of the proposed development on the historic monuments, buildings and spaces of the city, and to look at broader questions of the conservation and appreciation of the historic city as a whole, and the contribution that its historic character and significance make to Norwich's present and future vitality as a place. We consider, unequivocally, that the proposed development would severely harm Norwich's significance, and that of the city's major monuments, and that of many of the historic streets and spaces, and the historic buildings which define them, which together make up the cityscape. All are protected by what are often the highest levels of designation, and as an ensemble their importance is outstanding. We consider that the development would strike at the character that makes Norwich so special. In doing so it would also compromise the qualities that make cities such as Norwich so attractive to contemporary life.

In view of the harm the proposals would cause to so many and such important designated heritage assets, we consider that the scheme runs counter to all national and local policy concerned with the protection of the historic environment – policy set out above all in the National Planning Policy Framework and in the local plan, and buttressed by relevant legislation.

It follows that Historic England recommend that your council refuse planning permission for this scheme. Were the scheme to be approved the implications would be of national importance so should your council be minded to grant planning permission we will ask the Secretary of State to call in the scheme for his own determination.

Historic England do not believe that your council need choose between the proposals contained in this application and the further decay of Anglia Square. There is no doubt that Anglia Square presents an opportunity for development which could bring many benefits to the city, but it is one which we consider should be taken in a manner which accords with the character of the wider cityscape – one which would realise the National Planning Policy Framework's aspiration for sustainable development which reconciles social, economic and environmental benefits. We are keen to work with the City Council, the community and the owners of the site in pursuit of this goal.

2. Historic England Advice on the Revised Application

This application seeks planning permission for the comprehensive redevelopment of Anglia Square. It is proposed to replace the existing buildings, which date from the 1960s and 1970s, with a very substantial development which would include a hotel, cinema, shopping centre, car park and over 1,000 residential units. The proposed development would be arranged so as to reinstate something of the lost streetscape of the site, and to create a new view from within the site towards the Anglican cathedral. The amended plans contain a number of changes to the initial proposals, of which the most important is the reduction of the tower from 25 to 20 stories in height.

Historic England consider that the amendments would have no material effect on the impact of the proposed development on the character and significance of Norwich as a historic city. Whilst they would change its effect on certain areas and buildings within the city, the development as a whole would still have a severely damaging impact on Norwich as an historic place, on the significance of the city's greatest historic buildings and on that of many others, on historic spaces within the city and on historic parks beyond it. We have, however, amended our detailed assessment where appropriate in response to the revised material.

3. The Significance of the Designated Heritage Assets Affected

The starting point for Historic England's assessment of the impact of the proposed development is an understanding of the significance of the designated heritage assets which it would affect – whether scheduled monuments, listed buildings, registered landscapes or the historic cityscape designated as a conservation area. Because of the scale of the proposed development, and in particular the height of the tower, it would have a visual impact on the wider landscape of the city, elements of the city centre conservation area and listed buildings and scheduled monuments within it, as well as a physical impact on the site in the form of demolition and construction. (We do not consider the physical impact of the scheme on the site itself; others will comment on archaeological questions to which this may give rise.) We have therefore considered the significance of heritage assets over a wide area in order to assess the impact on them. Additional detail of the significance of these heritage assets is contained in the annex attached to this letter.

The historic city of Norwich lies in the Wensum valley, with **major historic landmarks** on a series of hills on the south side, including the castle, city hall, Roman Catholic cathedral and the prominent churches of St Peter Mancroft and St Giles. The elevated position of these buildings emphasises aspects of their historic status and illustrates the historic development of Norwich. The Anglican cathedral is lower down by the river but its tall spire can be seen with this group in views from the north and east. All these buildings are listed at grade I or II*. The castle, one of the major Norman fortifications of 12th century Europe (grade I), commands views over the valley from its motte and battlements. On the north side of the river the valley side slopes more gently and features more low-lying historic development.

Many aspects of the layout of the present city date from its dramatic expansion and redevelopment following the Norman conquest, including the **market place**, now

framed by the 1930s City Hall (grade II*), St Peter Mancroft (grade I) and the Guildhall (grade I). There are spaces which originated in the Saxon period, such as Tombland and Palace Plain. The city walls were established between 1297 and 1334, enclosing a large area which contained extensive open land. Within the medieval city walls, parts of which survive, there are extensive areas of medieval streets with numerous medieval and post-medieval buildings, including 35 medieval parish churches, a remarkable survival in northern Europe.

The **cathedral** of the Holy and Undivided Trinity and the associated Benedictine monastery were largely complete by 1145, although the cathedral's spire was rebuilt in the 14th century. One of the great Romanesque buildings of Europe, the cathedral is a major landmark across the city and appears in views approaching the city and from the more open northern side of the river valley including the upper slopes. Views from the River Wensum and Mousehold Heath show the cathedral to best effect.

The cathedral's **Upper Close** is an intimate space defined by the precinct wall, the cathedral and a range of building associated with the monastic period of its history and a fine group of scheduled and grade II* listed buildings around the 14th century former chapel of the Carnary College. The **Lower Close** includes a large open area of playing fields between the river bank and the cathedral. This is one of the few places in the city from where the cathedral can be seen unimpeded and in a landscape setting; and no prominent modern buildings or development intrude into or detract from this important and beautiful scene.

Beside the Lower Close is **Bishopsgate** with the scheduled 14th century Bishop's Bridge and Great Hospital, one of Britain's oldest hospitals, founded in 1249 and comprising St Helen's church, the hospital cloister, hall and master's house, all listed at grade I, and several other historic buildings including almshouses. At the western end of Bishopsgate is **Palace Plain**, a highly significant historic space surrounded by heritage assets including the cathedral precinct wall and Bishop's Gate (listed grade II* and scheduled respectively), St Martin's church (grade I) and a range of historic houses (listed grade II* and II).

Tombland is a roughly triangular open space outside the Close defined on one side by the precinct wall and buildings constructed against it, with historic buildings on the other sides, giving a remarkable consistency in form, materials and detailing which is largely undisturbed by modern development beyond the space. **Wensum Street**, leaves Tombland at its north-west corner before crossing the river to **Fye Bridge Street** and has a similarly dense pattern of historic building crowding the roadside, dating from the 17th to 19th centuries but again with considerable consistency of scale and traditional materials.

North of the River Wensum a network of historic streets converge on or border Anglia Square. **Colegate** runs parallel with the river and is lined with buildings of great historic and architectural value including a number of 18th century town houses, non-conformist chapels and St George's church, many of listed at high grades. From it **St George's and Calvert Streets** run northwards towards the application site; these are intimate in character, with small-scale red brick housing. **St. Augustine's Street** is lined with historic buildings, several listed and hiding 15th-

17th century buildings behind later facades. The parish church of St Augustine (grade I) with its early 18th century brick west tower stands in a large churchyard with a terrace of six houses, numbers 2-12 Gildencroft.

Magdalen Street runs along the eastern side of the application site, between Magpie Road and the Wensum, and is divided by the inner ring road overpass. In the southern part there are continuous historic buildings built close to the roadside dating from the 16th to 19th centuries. The northern part of the street has seen more modern development, but there are several buildings with 17th century work behind 18th and 19th century frontages. Some modern building is unsympathetic to this character, including Anglia Square itself, but much of it at least conforms to the height of historic building in the street.

Around St Augustine's Street and Magdalen Street are 19th century terraces of housing on **Sussex Street, Esdelle Street and Leonard Street, Cowgate, Bull Close, Willis Street and Peacock Street**. These have a modest, intimate character typical of the building type and period.

Parts of **Norwich city wall** remain standing on the northern edge of the conservation area, including a tall section on Magpie Road and smaller but longer parts set in a broad open area on Bakers Road (both are scheduled). Most of the wall along Magpie Road has been removed but Victorian terraced housing reflects its line and defines the edge of the conservation area. From these streets there is little large-scale modern development prominent in views of the walls, but some modest brick-built housing on Bakers Street which, like the Victorian terraces reinforces the former presence of the wall in a positive way.

Beyond the historic city **Waterloo Park**, a designed park of 1931-3 (registered at grade II*), is set amongst contemporary housing development on its east and west sides, but the playing fields of an adjacent school have maintained an open aspect to the south beyond the boundary planting and with it a relationship with the city centre. At the top of the Wensum valley is **Catton Park**, the first commission for the celebrated garden designer Humphry Repton in 1788, now registered at grade II*. The park had a deliberate relationship with the city below and the spire of the Anglican cathedral in particular. A belt of later planting screens the park from the modern outer ring road but the visual impact of features in the city beyond it remains important.

4. Impact of the Proposed Development

The aspect of the development's impact with which Historic England are principally concerned is its visual impact on Norwich, and the effect of this on the significance of the city and of its monuments, buildings and spaces, and on their appreciation. While the revised and new images produced to illustrate the visibility of the proposed development from various vantage points are helpful in indicating its possible impact we note that such images cannot be more than aides to assessment. Although produced to accepted professional standards, such images do not fully reproduce the effect of how a viewer might see a scene. We have reviewed the images on site and consider that in many instances the presence of the proposed development

would be more pronounced than the images suggest. This should be borne in mind when considering the visual impact on the appearance and character of the city.

Such is the scale of the proposed development that it would become a prominent feature in general views across the city. In views from St James' Hill on Mousehold Heath and from Kett's Heights the proposed tower and the bulk of the greater part of the development would be seen in combination with the **major landmarks** in the south of the city, including the castle, city hall, St Peter Mancroft and St Giles' churches and the Anglican and Catholic cathedrals (images 8 and 9). Despite the elevated position of several of these buildings, and the height of the Anglican cathedral, the development would appear as a competing, distracting and discordant landmark. These elevated vantage points are locations from which the Anglican cathedral with its grand 14th century spire is seen to best effect and from where the early form of the building can be appreciated. The proposed tower would detract from an appreciation of the cathedral in these views. The development would detract from an appreciation of Norwich's greatest historic buildings, and from the historic city as a whole in a way that other modern buildings do not.

From the **castle** mound and battlements the extent of the north side of the Wensum valley can be seen, as can the partly wooded ridge enclosing the valley. The development would be a prominent feature in these views, with the tower even at its reduced height exceeding any historic or modern building and compromising an appreciation of the relationship between the castle, the city and the landscape (image 12). Other substantial parts of the development would also be prominent in these views, blocking views of the ridge beyond the city.

Little of the modern building beyond the northern side of the **market place** disrupts the character and grain of the cityscape due to the falling ground level towards the Wensum. The proposed tower would appear above the roof of the Guildhall in a view flanked by the market place, St Peter Mancroft and City Hall (image 11). It would also be visible from the first floor balcony of the City Hall (image 53). The tower would form an element at odds with the character of this side of the space, and with it a measure of harm to historic significance. The views from City Hall reflect the building's physical and symbolic position overlooking the heart of Norwich.

The cathedral close is vital to Norwich's exceptional character and significance. In its original iteration the proposed tower would have been visible from the Upper Close, disrupting its remarkably uncompromised architectural and historic character. With the reduction in the height of the tower that would no longer be the case. Instead, however, it is now clear that the tower would be visible and prominent in the majestic views of the cathedral obtained from the Lower Close. Here one can appreciate the exceptional architectural character of what is one of the finest Romanesque buildings in Europe and one of England's great cathedrals, in a setting at once pastoral – characteristic of the more generous cathedral closes – and part of the historic city. New photomontages show that these views would be compromised by the appearance of the tower – unsurprisingly as the top of the existing Sovereign House is itself visible (although not prominent) in certain views. The view from the Lower Close is one of those in which we think it likely that the impact of the tower would be felt far more strongly than the image suggests. The presence of the proposed tower in this classic view of the cathedral would compromise both its

beauty and its historic character. In doing so it would mar the appreciation of one of Norwich's outstanding experiences by both citizens and tourists alike. (The relevant photomontages are images 20, 21 and 60.)

Bishopsgate is an important medieval road into the city, leading from the 14th century Bishop's Bridge (scheduled) and passing the Great Hospital, including St Helen's church, the hospital cloister, hall and master's house (all listed at grade I) and other historic buildings including almshouses. It has now been demonstrated that in views from the Bishop's Bridge the development would be hidden by existing buildings (image 59), but we remain concerned that it might be visible from, and compromise the character of, the Great Hospital.

As we previously noted, the existing buildings at Anglia Square can be seen from the first floor of St Helen's House in the historic Great Hospital; and it therefore seems possible that the proposed development could be seen from open spaces around the Hospital complex. Were this to be the case, the development would detract from the harmonious grouping of buildings and the sense of seclusion which give the grounds of the Hospital their particular character, and so from an appreciation of this remarkable historic complex and its significance.

The information produced to date does not contradict this supposition. Although the development might be hidden by buildings in views from a courtyard adjacent to the chancel of St Helen's church and the Great Hospital's medieval cloister and from a location south of St Helen's House (images 57 and 58) it is not certain that it would not be visible from the north side of St Helen's House. It is surprising that in an image, shown to us informally and taken from here, the tower would be amongst trees. It would be helpful were a verified view to be submitted.

Tombland, Wensum Street and Fye Bridge Street share a dense pattern of historic buildings, varied in style but with considerable commonalities of scale and traditional materials. Tombland, in origin the Saxon marketplace, forms the setting for the Erpingham Gate to the Cathedral Close, and is undisturbed by any discordant development. The proposed tower would be visible from within Tombland where Wensum Street joins the plain (image 23), and would be quite at odds with the space's historic character. Wensum Street is one of the city's principal thoroughfares, and its historic character is similarly uncompromised as it descends from Tombland towards the river. The tower would be highly prominent looking down Wensum Street towards the bridge – and indeed would be placed so as to catch and hold the eye (image 25). From Fye Bridge itself the tower would rise above the consistent historic streetscape of Magdalen Street (image 53, revised from the initial submission, is taken from a more appropriate vantage point than the original).

Another area with a streetscape of traditional character and great historic value adjoining Wensum Street is **Elm Hill** – indeed, the picturesque qualities of the street are widely celebrated. Elm Hill's consistent historic character is complemented by the scale and form of buildings at Friar's Quay across the river. In its reduced form the proposed tower would be less visible than the initial proposal would have been, but it would be glimpsed from Elm Hill and from the churchyard of St Peter Hungate (image 55). In these exceptionally characterful and undisturbed historic enclaves even glimpses of the tower would detract from their special character. This prompts a

general observation: it is difficult to predict where glimpses of the tower might be found, and the historic core of Norwich contains a number of sensitive locations whose character could be adversely affected by even partial views.

Colegate is lined with buildings of great historic and architectural value and St George's and Calvert Streets, with small-scale red brick housing, some historic and some suitably scaled modern additions, lead from it. The sensitivity of this area is such that even glimpses of the tower, alien in its form, scale and design, would detract from its character. Despite the reduction in the height of the tower, the proposed development would be visible from **St George's Street and Calvert Street** intensifying the impact of existing modern development in views down these streets, harming the significance of this part of the conservation area and that of the listed buildings. The development would also be visible from Doughty's Hospital, a complex of 19th century almshouses listed at grade II, and the height and massing of the proposed development would exacerbate the harmful impact of the existing modern development to the north of the Hospital courtyard. The reduced height of the tower does not appear to make any material difference to this impact (image 44).

St. Augustine's Street is lined with historic buildings, several concealing 15th-17th century structures behind later facades. Several are listed. The parish church of St Augustine (listed grade I), with its early 18th century brick west tower, stands in a large churchyard, with a terrace of six houses, numbers 2-12 Gildencroft, at the southern end of the street. The proposed development would dominate all this. The residential tower would rise above the hitherto consistent roofline of St Augustine's Street while the bulk of the proposed development would greatly exacerbate the already harmful effect of the existing buildings of Anglia Square (images 15 and 16). The reduced tower and the revised development overall would still be an overwhelming presence in views of and from St Augustine's Church and the adjacent cottages. A substantial block of building would face the church and cottages and the proposed tower would dominate their setting, resulting in marked harm to their historic significance (images 32 and 33).

In the southern part of **Magdalen Street** there are continuous historic buildings close to the roadside, consistent in form and scale. Unsurprisingly, the proposed development would have a much more intense impact than the existing buildings of Anglia Square (image 42). The reduction in height of the tower is unlikely to diminish this impact materially.

Around Magdalen and St Augustine's Streets are the 19th century terraces of housing on Sussex Street, Esdelle Street and Leonard Street, Cowgate, Bull Close, Willis Street and Peacock Street. These have a modest, intimate character typical of the building type and period. Although the bulk of development would be hidden by the buildings of the southern side of Sussex Street, the tower might still be visible across the open ground at the western end of the street (image 51). At the end of Cowgate Street the development would intensify the presence of large modern building out of scale with the historic buildings (image 35). As Sovereign House can already be seen on Leonards Street we consider that the proposed tower would be visible here and could also affect views from Esdelle Street. No images have been produced to corroborate or contradict this judgement, despite requests.

The proposed tower would rise above the section of scheduled **city wall** by the junction of Magpie Road and St Augustine's Street, despite the reduction in its height, in a place where no other building breaks the skyline above the wall. The appearance of the tower would detract from an appreciation of the wall as an enclosing, defensive boundary. The proposed tower could also intrude into views of the former line of the wall and the conservation area boundary which follows it along Magpie Road, where it is defined in a positive manner by terraced housing, potentially resulting in harm to the significance of the conservation area. In our previous advice we suggested an image of the view from further along Magpie Road where the ground level opposite the Victorian terraces continues to rise on Starling and Heath Roads could confirm if there would be such an affect; but this has not been produced.

Relatively little of the building beyond **Waterloo Park** is visible from inside it because of trees, but the spire of the Anglican cathedral stands out, its presence emphasised by what appears to be a managed break in the trees. The proposed tower would be visible, especially in winter when the leaves have fallen (image 48). Almost the height of the spire and greater in bulk, the tower might not simply rival the spire but could prove the more prominent 'eye-catcher' in this view, detracting from the experience of being in the park.

Also beyond the historic city is **Catton Park**, Humphry Repton's first landscape. Repton framed a view towards the spire of the cathedral, which survives. A belt of later planting screens the park from the modern outer ring road but the visual impact of features in the city beyond it remains important. When experienced in person, the view to the cathedral is a more important feature than the original image submitted seemed to suggest (image 1). Although revised images suggest that the proposed tower, and the accompanying development, would be screened by the planting along the southern edge of the park (images 61 and 62) it remains possible that the development would be visible in winter, to the detriment of the designed aesthetic character of the park

Historic England advise your Council that the impact of the proposed development would remain severe notwithstanding the revisions to the scheme since its first submission. The proposed development would continue to be of a scale and character alien to Norwich's historic character. The development as a whole would be at odds with the historic grain of the cityscape, while the tower would still rise within the northern quarter of the medieval city to vie with the great historic landmarks of the city – the castle, the two cathedrals and City Hall, St. Peter Mancroft and St. Giles. The reduced scheme would no longer be visible in some views, some of them important, but the reduction would make no material difference to the nature of its effect on Norwich. When its impacts are taken together, we consider that the proposed development would profoundly harm the character of the historic city. It would mar the richness and coherence of the cityscape, and its form and character would be radically at odds with the city's historic topography, character and grain.

5. Legislation, National and Local Policy and Guidance

Legislation, National Policy and Guidance

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affects a listed building or its setting local planning authorities shall have special regard to the desirability of preserving the building or its setting (section 66 (1)). Special attention shall also be paid to the desirability of preserving or enhancing the character or appearance of a conservation area in the exercise of any powers under the planning Acts (section 72). In this case several of the buildings affected by the proposed development are listed at grade I and II* and so fall within the most important 5.5% of listed buildings nationally, while the conservation area which encompasses Norwich's medieval limits is itself one of exceptional significance, making adherence to these statutory duties especially critical in the determination of this application.

The National Planning Policy Framework ("The Framework" or "NPPF") states that the purpose of the planning system is to achieve sustainable development and that protection and enhancement of the historic environment is an overarching objective in this (NPPF, 7 and 8). 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 (NPPF, 184).

The Framework requires local plans to contain a positive strategy for the conservation and enjoyment of the historic environment (NPPF, 185). Such strategies should take account of the desirability of sustaining and enhancing the significance of heritage assets; the wider social, cultural and economic benefits that the conservation of the historic environment can bring; the desirability or new development making a positive contribution to local character and distinctiveness; and opportunities to draw on the contribution made by the historic environment to the character of a place.

The Framework enjoins local planning authorities to take account of similar considerations when determining applications, namely the desirability of sustaining and enhancing the significance of heritage assets; the positive contribution that the conservation of heritage assets can make to sustainable communities, including to their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness (NPPF, 192).

When considering the impact of a proposed development on the significance of designated heritage assets the Framework requires local planning authorities to give great weight to the asset's conservation, and that weight should be proportionate to the asset's significance (NPPF, 193). The more important the asset, the greater the weight accorded its conservation should be.

The Framework distinguishes between "substantial harm" to designated heritage assets, an exceptional phenomenon, and harm which by opposition is characterised as "less than substantial" (NPPF, 194-196). Harm may be caused by alteration or destruction, or by development within the setting of an asset. "Less than substantial

harm” is a term encompassing a broad range of harm from a high level to a low. Where a development proposal would lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal (NPPF, 196).

The Framework states that that good design is a key aspect of sustainable development, helping to create better places in which to live and work and to make development acceptable to communities (NPPF, 124). It requires that planning policy and decisions should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities) (NPPF, 127).

Historic Environment Good Practice in Planning Advice Note 3, The Setting of Heritage Assets (2nd edition, 2017), provides guidance to help understand and apply law and policy in respect of setting. While in this case the impact of the proposed development is perhaps most readily understood as an impact on the character of Norwich as a historic place, it may also be understood as an impact upon the setting of the various designated heritage assets to which reference is made here (as well as an impact of that of undesignated heritage assets). The advice note’s guidance is therefore relevant.

Local Policy

The positive strategy for the historic environment which the Framework requires local planning authorities to adopt can be found threaded through the local plan. Its broadest expression is in the statement of the vision and overall objectives for the plan. The latter include the protection and enhancement of the individual character and culture of the area, and the protection, management and enhancement of the natural, built and historic environment (objectives 8 and 9).

Anglia Square is not specifically identified in Norwich City Council’s Adopted Local Plan (2014) but there are a number of policies in the Development Management Policies Document which guide development in the historic city. Policy DM1 (‘Sustainable Development Principles for Norwich’) states that ‘...development proposals will be expected...to...protect and enhance the ...heritage assets of the city and to safeguard the special visual and environmental qualities of Norwich...’ Policy DM3 (c) states that ‘significant weight will be given to the following design principles in assessing development proposals. Proposals should respect, enhance and respond to the character and local distinctiveness of the area. The design of all development must have regard to the character of the surrounding neighbourhood and the elements contributing to its overall sense of place, giving significant weight to the uses and activities around it, the historic context of the site, historic street patterns, plot boundaries, block sizes, height and materials.’ 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...’. The Supplementary Text appended to the Plan (paragraph 9.3) reinforces this by stating that ‘all opportunities to protect, conserve or better reveal

the significance of nationally designated assets should be taken in new development.’

Anglia Square was allocated for mixed use development in the 2004 Replacement Local Plan and subsequently in the Northern City Centre Area Action Plan (2010). This Action Plan expired in March 2016 and a site specific Planning Policy Guidance Note for Anglia Square was issued by Norwich City Council in March 2017. In the absence of an adopted Supplementary Planning Document or site allocation in an Adopted Local Plan, the Policy Guidance Note is the only current Council planning policy document that specifically relates to the redevelopment of Anglia Square.

The Anglia Square Policy Guidance Note was produced in response to the particular form and nature of the present development proposals, rather than being a comprehensive options appraisal for the development of the site. It makes some general observations regarding the way development should respond to the conservation area and setting of nearby designated heritage assets but does not draw explicit conclusions about the scale of new development.

Paragraph 3.18 of the Guidance Note states that “the height and traditional character of buildings and streets to the north and east of the site, (most immediately Magdalen Street, St Augustine’s Street and Gildencroft), needs to be respected in the redevelopment to ensure the buildings, streets and their settings are not unduly dominated or harmed by the new buildings.” It goes on to say (paragraph 3.23) “the buildings surrounding the site (other than the office buildings immediately bordering the site to the south) are of a traditional character forming terraced streets of two to three storeys in height, with new four storey flats opposite Edward Street. The relationship between the buildings on St Augustine’s Street and Gildencroft, including St Augustine’s Church, needs to be carefully considered so that their setting is respected in any redevelopment”.

The Guidance Note does not consider the possible visual impact on the historic cityscape of Norwich as whole, but does comment on some specific views. Paragraph 7.88 notes that ‘the redevelopment of Anglia Square offers opportunities to reinstate and improve views from the north of the site to major city landmarks, including the Anglican cathedral.’ However, paragraph 7.87 says that ‘a future planning application would need to address how the proposals can successfully integrate and improve upon the existing townscape character’ and there is a general statement on the setting of heritage assets (paragraph 7.90): ‘new development should be sensitive to the scale of existing buildings in its vicinity and must respect the setting of historic assets.’ It is stated (paragraph 7.91) that ‘there may be scope to provide a landmark building within the site...[but] a landmark building does not necessarily need to be a landmark as a result of its height and particular attention must be paid to such proposals in view of the highly sensitive townscape of the St Augustine’s Street area...’

An additional document which relates to the application site is the Norwich Conservation Area Appraisal (Anglia Square Character Area). This also contains management policies which include respecting the scale of existing development where new development meets it along Magdalen Street (policies D1, D3, E4).

6. Historic England's Position

Historic England consider that the proposed redevelopment of Anglia Square would have an extensive and severe impact on the character and significance of Norwich as an historic place, on the significance of the city's greatest historic buildings and on that of many others, on the significance of important parts of the Norwich city centre conservation area and on that of historic parks beyond it, and on people's appreciation of that significance. This was our conclusion in response to the first iteration of the proposals, and having considered the revised plans, images and other details provided in support of the amended scheme we do not consider that the amendments would materially reduce the overall impact of the scheme.

The harm to Norwich's significance and to that of the significance of the many monuments, buildings, spaces and landscapes which we have identified above, would be caused essentially by the visual presence of the development in the cityscape. This harm would follow from the nature of the development, and can be restated in summary by considering both setting and character.

In respect of setting, many of the attributes of setting which the advice note suggests may contribute to the significance of a place or building are relevant, as are many of the elements of a development which it suggests might help elucidate the impact of that development (GPA 3, "Step Two" checklist, page 11, and "Step Three" checklist, page 13).

Norwich's topography means that the great royal and civic buildings – the castle and Civic Hall – overlook and dominate the city, while the scale of the cathedral in the river valley, and the great height of its spire, mean that it rises to join them in articulating and lending form to the cityscape. All this can be seen most vividly from Mousehold Heath. Although complex and continually changing, Norwich's cityscape retains the distinctive character common to many historic towns and cities (or at least those which have not undergone extensive, large-scale modern development), in which civic and religious buildings lend dignity and identity to the broader town or cityscape. As so often in such places, this is achieved in part by the scale of those buildings themselves, but equally by the landmarks which their towers, campaniles and spires create – all structures whose purpose is essentially symbolic. This historic character survives strongly in Norwich, despite its gradual erosion by the pressures of recent development. Then there is the scale and grain of the broader townscape. Norwich's great monuments articulate an exceptionally rich network of spaces and streets, some shaped by the Saxon and Norman development of the city, framed by historic buildings remarkable for their number and quality. The pattern of spaces, streets and buildings, and the scale and grain of the latter, all combine to create a remarkable ensemble. In all these ways, aspects of setting contribute to the significance not only of particular buildings – great or modest – but to the extraordinary significance of the whole.

The attributes of setting which contribute to this significance are those which the proposed redevelopment of Anglia Square would damage. From Mousehold Heath the particular relationship between Norwich's historic landmarks and the wider cityscape would be severely compromised by the intrusion of the bulk of the major part of the proposed development, and the bulk and height of the proposed tower.

The presence of the development would erode, and arguably destroy, the historic character which the city derives from the continued dominance of its great civic and religious buildings. The coherence of the exceptional ensemble of historic spaces, streets and buildings which makes up the historic cityscape of Norwich would be severely damaged by the presence of the proposed development, overwhelming in its impact on those parts of the city closest to it, but harmful to the city as a whole. The cumulative impact of the development, seen across the city, from places of exceptional importance such as the terrace on the castle's motte – or from its battlements, now to be opened to the public – and the Lower Close, but also from a host of other places, among them great spaces such as Tombland, major thoroughfares such as Wensum Street and Magdalen Street, and a host of lesser vantage points, such as Colegate or the courtyard of Doughty's Hospital, would be such as to cause profound harm to the character of the city.

This analysis has been framed with reference to the guidance in respect of setting, but as the conclusion of the previous paragraph suggests, in practice considerations of setting and character are closely intertwined in considering the impact of the proposed redevelopment of Anglia Square.

Given Historic England's assessment of the harm to designated heritage assets which this scheme would cause, the proposals would be contrary to the Framework's emphasis on the irreplaceable nature of heritage assets and its policy seeking their conservation in a manner appropriate to their significance (NPPF, 184).

The Framework enjoins local planning authorities, when determining applications, to consider the desirability of sustaining and enhancing the significance of heritage assets, the positive contribution such assets can make to sustainable communities, including to their economic vitality and the desirability of such development making a positive contribution to local character and distinctiveness (NPPF, 192). The proposed development would harm the significance of designated heritage assets, would compromise the qualities which make historic Norwich so attractive a place for people to live, would compromise the qualities which contribute to its economic vitality – both in respect of tourism but also in respect of other sectors of economic activity known to thrive in historic places, and would profoundly harm, rather than contribute to, local distinctiveness.

The Framework requires great weight to be given to the conservation of designated heritage assets by local authorities determining applications, and that weight should be proportionate to the asset's significance (NPPF, 193). The range of designated heritage assets whose significance would be harmed by the proposed development is very large, and it includes, in the major historic buildings of the city and in the historic city as an entity, designated heritage assets of exceptional importance, of European as well as national significance. Many of the buildings whose significance would be harmed by the proposed development are listed at high grades, and therefore among the most important 5.5% of listed buildings, and some are of European importance. It follows that the weight to be accorded by the council to their conservation should be very, very high.

Any harm to such assets should require clear and convincing justification (NPPF, 194). Given the severity of the harm the proposed development would do to so large

and in some cases so significant a set of designated heritage assets, such justification should be compelling. In essence, the applicants argue that their scheme is justified because it provides the only means by which the existing buildings of Anglia Square could be demolished and the site redeveloped, with all the benefits that such redevelopment would bring.

While Historic England have not independently assessed the financial justification for the proposed development we question whether it provides such clear and compelling justification. The relevant supporting statement (Planning Viability Report by Icení dated September 2018) deals with the quantum of housing but does not demonstrate that the same quantum of development could not be achieved by displacing the accommodation within the 20 storey tower – something which would certainly reduce the harm which the proposed scheme would cause, although it would by no means eliminate it. Equally we are not persuaded that it has been established that a fundamentally different approach to the development, and a different approach to the deployment of public funding, could not provide for a scheme which would either complement or be less at odds with the grain and character of Norwich's cityscape and the topography of the city. Finally we note that although the existing buildings of Anglia Square are unsightly and in part not fit for use, the development as a whole continues to serve some economic and social purpose, and the existing buildings, although discordant in their immediate setting, cause much less harm to the wider cityscape than would the proposed scheme. Given these considerations it is not evident that there is clear and compelling justification for the harm that the proposed development would cause.

Finally the Framework requires that should proposals for development entail harm to designated heritage assets this harm should be weighed against such public benefits as the development would provide (NPPF, 196). We shall turn to this balance after first noting the relevance of the Framework's policies on design and then considering the local policies pertaining to the conservation of the historic environment.

The Framework provides broad policies about design, which are generally pertinent to consideration of this application (NPPF, section 12). One of their provisions is that both planning policies and the determination of applications should ensure that developments are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities) (NPPF, 127). The proposed development would not be sympathetic to local character or to the surrounding built environment.

The positive strategy for the conservation and enjoyment of the historic environment, which the Framework requires local planning authorities to adopt, is to be found threaded through the local plan. It is evident, for example, in the vision and overall objectives for the plan, which include an objective to protect and enhance the individual character and culture of the area and an objective to protect, manage and enhance the natural, built and historic environment (objectives 8 and 9). Given the harm that the proposed redevelopment of Anglia Square would cause to Norwich's historic character and significance, and to that of the particular buildings, streets, spaces and landscapes considered here, this scheme must be considered to be fundamentally at odds with any positive strategy for the historic environment.

The proposed development similarly fails to meet the objectives of the relevant development management policies for the historic environment. The local plan expects proposals “to protect and enhance the physical, environmental and heritage assets of the city and to safeguard the special visual and environmental qualities of Norwich for all users” (DM1). The proposed development would do the opposite. The plan expects proposals to respect, enhance and respond to the character and local distinctiveness of the area (DM 3). The proposed development would be harmful to the character and distinctiveness of the city; and such benefit which might be achieved by the reinstatement of something of the original pattern of streets on the site itself would be overwhelmed by the scale of the development lining them, even before considering the wider effects of the scheme.

The Anglia Square Policy Guidance Note provides some guidance in respect of the impact of any development on the environs of Anglia Square, referring to the importance of respecting the height and traditional character of adjacent streets and to the relationship of any development to St. Augustine’s Street (paragraphs 3.18 and 3.23). Although a small part of the development on Edward Street might complement the scale of the adjacent streetscape, the scale of the development as a whole and that of the tower in particular would be wholly at odds with the neighbouring buildings and streets. The existing buildings of Anglia Square pay little heed to their neighbours’ scale and character: those that are proposed would pay less. The guidance does encourage consideration of how the redevelopment of Anglia Square might enable the creation of a view to the city’s major monuments, and to the Anglican cathedral in particular (paragraph 7.88). The proposed scheme does provide for such a view, as part of its reinstatement of something of the historic streetscape. It is notable that the note contains no more general provisions about the relationship between any redevelopment and the cityscape as a whole; and it is difficult to consider the creation of one view of the cathedral from within the development as providing a benefit in any way comparable to the harm that would flow from the proposed redevelopment as a whole.

While it is common for national and local planning policies relevant to different subjects to be in tension, the Anglia Square Policy Guidance Note seems to us to raise exceptional questions. Much of what the proposed development would provide is consistent with the note’s guidance, but it could only be provided by ignoring the note’s guidance about the relationship between the proposed development and the adjacent areas of the city. Nothing in the note suggests that the City Council, in producing the note, anticipated that any development which met its several functional objectives would be of such scale as not only to dominate its immediate surroundings but also radically to undermine the application to Norwich of all national and local policies for the protection and enhancement of the historic environment.

As stated above, the Framework requires the Council to weigh the public benefit arising from the proposed development against the harm to the historic environment (and against any other detrimental effects relating to other areas of policy) (NPPF, 196). Historic England consider such of those benefits as might be thought heritage benefits would be greatly outweighed by the harm which the proposed scheme would cause to Norwich’s significance. It is for the City Council to undertake the overall planning balance, and we do not comment on the weight to be accorded to

other public benefits arising from the scheme. Historic England do, however, remind the council of the very great weight which should be accorded to the conservation of the designated heritage assets whose significance would be harmed in this case, and of the statutory duties relating to the determination of applications affecting listed buildings and conservation areas.

We also note that in articulating the nature of sustainable development, the Framework states, 'achieving sustainable development means that the planning system has three overarching objectives, which are interdependent and need to be pursued in mutually supportive ways (so that opportunities can be taken to secure net gains across each of the different objectives)' (NPPF, 8). One of these objectives is to contribute to protecting and enhancing our historic environment. Given the severity of the harm which the proposed development would cause to Norwich's historic significance, it is very clear that in this case the scheme before your council fails emphatically to meet this aspiration.

We are aware that an alternative approach to the redevelopment of Anglia Square has been put forwards by the Cathedral, Magdalen and St Augustine's Forum, a local group. This approach has been informed by public consultation and seeks to respond to the needs and concerns of the local community. Although the Forum's approach is only presented by simple, indicative plans, Historic England consider that it offers the prospect of realising the Framework's vision of sustainable development encompassing economic, social and environmental benefits in a way in which the proposed development could not. Certainly it offers the prospect of realising the opportunity that the redevelopment of Anglia Square presents to enhance its environs, and the perhaps the wider cityscape, rather than severely harming them. This would be, potentially, the sort of scheme consistent with the aspirations and requirements of local and national policy which it would be eminently appropriate to support with the substantial levels of public funding upon which the proposals set out in the current planning application would depend

Historic England strongly object to the granting of permission on the grounds of the harm the proposed development would cause to Norwich's historic character and to the significance of designated heritage assets, as described above. We would very much welcome the opportunity to engage with the Council, the community and the applicants to consider a revised approach to Anglia Square which would secure the site's redevelopment in a manner in accord with the character of Norwich. If the Council are minded to grant permission for the current proposals we will refer the case to the National Planning Casework Unit and ask that it be called in for determination by the Secretary of State in view of the exceptional nature and national importance of the questions to which the proposals give rise.

Recommendation

Historic England strongly object to the application on heritage grounds and recommend that the City Council should refuse to grant planning permission. Despite the reduction in the height of the proposed tower the development would result in severe harm to Norwich's historic character, to the historic significance of the Norwich city centre conservation area as a whole, to several important spaces within

it and to numerous scheduled monuments, listed buildings and registered historic parks, many of them designated at a high grade and some of European significance.

We consider that the application does not meet the requirements of the Framework, and note in particular both that the Framework requires that economic, social and environmental gains should be pursued in mutually supportive ways through the planning system, and that the great weight it accords to the conservation of designated heritage assets should be greater the more important the asset or assets (paragraphs 8 and 193). In this case, the proposed development would cause severe harm to the historic environment, while the importance of the designated heritage assets whose significance would be harmed by the development rather than conserved could scarcely be greater.

In determining this application your Council should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving the buildings or its setting or any features of special architectural or historic interest which it possesses and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account in determining the application. If you propose to determine the application in its current form and are minded to grant consent we will refer the case to the National Planning Casework Unit and request it to be called in for determination by the Secretary of State. Please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely



David Eve
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Conservation of Habitats and Species Regulations 2017 Assessment of implications for European sites: section 63(1)

Description of proposal:

Application 18/00330/F - Redevelopment of Anglia Square:

*Hybrid (part full/part outline) application on site of 4.51 ha for demolition and clearance of all buildings and structures except Gildengate House and the phased, comprehensive redevelopment of the site with 7 buildings and refurbished Gildengate House for a maximum of 1,250 residential dwellings (Use Class C3); 11,350 sq m hotel (Use Class C1); 9,850 sq m ground floor flexible retail, services, food and drink and non-residential institution floorspace (Use Classes A1/A2/A3/A4/D1/Sui Generis (bookmakers and/or nail bars, up to 550 sqm)) within ranges specified in the Retail Strategy Report; 1,150 sq m ground floor flexible commercial floorspace (Use Classes A1/A2/A3/A4/B1/D1), service yards, cycle and refuse stores, plant rooms and other ancillary space; up to 3,400 sq m cinema (Use Class D2); 1,300 sqm place of worship (Use Class D1); and multi-storey car park (public element: 600 car spaces, 24 motorcycle spaces), with associated new and amended means of access, closure of existing means of access, widening of footways, formation of service/taxi/car club/bus stop laybys and other associated highway works on all boundaries, maximum of 950 car parking spaces for Use Classes C1 / C3 / B1 / D1, (of which maximum of 40 spaces for C1/B1/D1), hard and soft landscaping of public open spaces comprising 2 streets and 2 squares for pedestrians and cyclists, other landscaping, service infrastructure and other associated work; (all floor areas given as maximum gross external area); comprising; **Full planning permission** on 1.78 ha of the site for demolition and clearance of all buildings and structures, erection of 2 buildings for 428 residential dwellings (Use Class C3) (Blocks A and part E (tower only)), and within Block A, for 4,420 sqm ground floor flexible retail, services, food and drink and non-residential institution floorspace (Use Classes A1/A2/A3/A4/D1/Sui Generis (bookmakers and/or nail bars, up to a maximum of 550 sqm within entire scheme)) within ranges specified in the Retail Strategy Report, 380 sq m ground floor flexible commercial floorspace (Use Classes A1/A2/A3/A4/B1/D1), service yard, cycle and refuse stores, plant rooms, other ancillary space and multi-storey car park (public element: 600 car spaces, 24 motorcycle spaces), with associated new and amended means of access, closure of existing means of access, widening of footways, formation of service/taxi/car club/bus stop laybys and other associated highway works on Magdalen Street and Edward Street, 333 covered car parking spaces for Use Class C3, hard and soft landscaping of public open spaces comprising 2 streets and 2 squares for pedestrians and cyclists, other landscaping, service infrastructure and other associated works; (all floor areas given as maximum gross external area); and*

***Outline planning permission** on 2.73 ha of the site, with all matters reserved, for demolition and clearance of all buildings and structures except Gildengate House, erection of 6 buildings (Blocks B – H, with Block E to incorporate tower with full planning permission) and refurbishment and change of use from Use Class B1(a) to C3 of Gildengate House, (Block J), for a maximum of 822 residential dwellings (Use Class C3), 11,350 sq m hotel (Use Class C1), 5,430 sq m ground floor flexible retail, services, food and drink and non-residential institution floorspace (Use Classes A1/A2/A3/A4/D1/Sui Generis (bookmakers and/or nail bars, up to a maximum of 550*

sqm within entire scheme)) within ranges specified in the Retail Strategy Report, 770 sq m ground floor flexible commercial floorspace (Use Classes A1/A2/A3/A4/B1/D1), service yard, cycle and refuse stores, plant rooms and other ancillary space, up to 3,400 sqm cinema (Use Class D2), with associated means of access, widening of footways, formation of service/taxi/car club laybys and other associated highway works on New Botolph Street, Pitt Street and St Crispins Road, a maximum of 617 car parking spaces for C1 / C3 / B1 / D1 , of which circa 603 covered (with a maximum of 40 for C1/B1/D1), and circa 14 open for C3 (on west side of Edward Street), landscaping, service infrastructure and other associated works; and 1,300 sqm place of worship (Use Class D1) on north side of Edward Street with associated on-site car parking and landscaping; (all means of access reserved; all floor areas given as maximum gross external area).

Stage 1 - HRA screening including a judgement of Likely Significant Effects

The proposal constitutes a large scale housing project.

The Greater Norwich Joint Core Strategy (JCS) was adopted in March 2011 with amendments adopted in January 2014. The Appropriate Assessment (AA) of the JCS highlighted the need for consideration of hydrological impacts on Natura 2000 sites¹; and identified the need for green infrastructure (GI) provision to mitigate potential in-combination and cumulative effects associated with recreation impacts on international sites resulting from the JCS growth proposals. The principle being that if attractive GI is available close to new homes, residents will use that for their regular day-to-day recreation rather than visiting Natura 2000 sites.

The AA highlighted some areas of uncertainty regarding potential in combination and cumulative effects associated with growth and tourism (together with other issues) because of the dependence on the effectiveness and implementation of mitigation measures and actions required to avoid adverse impact on site integrity. The mitigation measures suggested were:

- The implementation of green infrastructure developments
- The allocation of greenspace to protect specific natural assets and designated sites to be implemented through area action plans (AAP).

The application site is neither within the boundary of a designated site nor within a buffer area identified by Natural England within which development is likely to affect designated sites. However, during the EIA screening exercise Natural England advised that the development may potentially impact on designated sites comprising of The Broads SAC, Broadland SPA and Broadland Ramsar site as a result of recreational disturbance due to in combination impacts with other housing development.

A number of documents have been submitted by the applicant. These include:

- ES - Chapter 4: Ecology (SEI Chapter 4)
- Appendix 12.1 Ecology information to inform AA

- Appendix SEI 12.1 Dog licence data
- Note of Clarification – dated Nov 2018

These documents include: a description of relevant designated sites, features and conservation objectives.

Natural England in their response to the first round of consultation on this application indicated that insufficient evidence had been submitted to enable this council to ascertain that the proposal will not result in adverse effects on the integrity (from recreational disturbance) of the sites in question, when considered in combination with other new housing proposals. Natural England's response highlighted that designated Natura 2000 sites within the area (e.g. Norfolk coast, Broads and the Brecks) are under increasing recreational and disturbance pressure, referencing research Panter *et al* (2016) Visitor Surveys at European Protected Sites across Norfolk during 2015 and 2016, Footprint Ecology. This report describes the link between new housing development and a rise in access to designated sites, it explains that "*increased recreation places increasing demands on the management of the European sites and can cause impacts to the designated interest features.*" Key findings of the report include that for the sites surveyed there would be a predicted increase of 14% in access by Norfolk residents as a result of new housing during the current plan period. For these sites the primary recreational activity was dog walking (41%) and walking (26%). For the designated sites in the Broads the impacts identified relate to disturbance caused to breeding /wintering/passage birds, trampling/erosion; eutrophication and contamination.

Following Natural England's response the applicant submitted further information relating to predicted levels of dog ownership within the proposed development and further clarification regarding open space and recreational opportunities available to new residents. This included an audit of parks and open spaces within walking distance/short drive from the site as well details of green infrastructure projects identified in the Greater Norwich Infrastructure Plan 2018 (GNIP). The GNIP supports the delivery of growth identified in the JCS and identifies a number of schemes to contribute to the protection and enhancement of the strategic green infrastructure network. The information submitted by the applicant predicts a very low level of dog ownership within the development and indicates that owners wishing to dog walk, or just walk, would have access to a wide range of recreational options thereby not relying on visits to European sites. Furthermore, they point to Habitats Regulations Assessments of the emerging Greater Norwich Local Plan Issues and Options and the Strategy for Sustainable Tourism which indicate that the more sensitive habitats are not easily accessible and that 'gateway' areas are well managed. On this basis they conclude that owing to the development and its location, it is not considered that there would be any likely significant effects on the integrity of The Broads SAC, Broadland SPA and Broadland Ramsar site, the River Wensum SAC or their component Sites of Special Scientific Interest (SSSIs) when the project is considered alone (i.e. impacts would be de minimis) and that there is no requirement for mitigation or compensation measures associated with the proposed development. In addition they conclude that such an effect could not then contribute to a significant in-combination effect when considered with other plans. It

is stated in para 6.11.13 of the Note of Clarification, significant effects are not likely to arise as a result of the proposed development, even when considered in the context of cumulative residential development that is approved, proposed on allocated sites or potentially to be allocated in the Greater Norwich Plan. They further indicate that the measures set out in the GNIP relating to the provision of green infrastructure are planned and in the process of delivery, and that these measures will mitigate the impact of new development across the Greater Norwich area on the European sites when considered in combination.

Natural England's advice is that in combination effects cannot be screened out simply because a project alone has no likely significant effect. This would not accord with the legislation which requires the likely significant effects of a project to be considered alone or in combination with other plans or projects. Natural England have considered this supplementary material and have advised without suitable mitigation being secured, that it is not possible to conclude that the proposal is unlikely to result in significant effects on the European sites in question in combination with other new housing proposals. This is because they contend there will be in combination effects with other allocated housing sites in the Greater Norwich Joint Core Strategy (JCS) (as evidenced in the HRA for the JCS and subsequently reflected in local spatial plan policies). They acknowledge that the likely effects from the development alone are not likely to be significant but in combination with other new development there is a likely significant effect which could affect Natura 2000 sites in the Broads.

Stage 1 Q. Are there Likely Significant Effects? Yes, there is an in-combination effect and mitigation has not been secured or is uncertain

Stage 2 – Appropriate Assessment

At AA stage, subject to inclusion of satisfactory mitigation, which may involve both on-site and off-site measures, it may be possible to ascertain that a proposal will not adversely affect the integrity of the designated site. Where there is an adverse effect or the effect is uncertain, then conditions or planning obligations may be used to enable it to be ascertained that the proposal would not adversely affect the integrity of the site. Permission may then be granted subject to the conditions or obligation identified.

In making a judgement one effect account has been taken of green infrastructure measures in the GNIP which have been specifically identified to deliver enhanced local recreational opportunities within Norwich. These include schemes to enhance walking routes leading out of the city, in particular Marriott's Way and the Riverside Walk, which provide access to the countryside and the Norfolk Trails network. These schemes will provide suitable and appropriate recreational opportunities for people, including dog walkers. Natural England have advised that 'by making a proportionate contribution to the existing off-site GI and local GI initiatives ... would help to reduce the effects of recreational pressures on Natura 2000 sites further afield.'

GI initiatives identified in the GNIP are funded through pooled CIL. Therefore within the greater Norwich area, all housing developments make a proportionate

contribution to the delivery of these GI projects through the payment CIL. This provides the framework through which the requirements of JCS1 are met. Natural England have indicated that securing a proportionate contribution from this development would enable the council to conclude no adverse effect on Natura 2000 sites, in combination with other JCS allocations. Having had regard to this advice it is considered necessary for such a contribution to be secured in order to satisfy the requirements of the AA. This normally would be through the payment of CIL but in the event of this development being subject to CIL relief, it will be necessary to secure a contribution through a S106 Obligation (see para).

Stage 2 Q Are there Adverse Impacts on Site Integrity? NO, mitigation secured

Date: 23 November 2018
Our ref: 259233
Your ref: 18/00330/F



Ms Tracy Armitage
Principle Planner
Norwich City Council
City Hall
Norwich

Customer Services
Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

BY EMAIL ONLY

Dear Ms Armitage

**Planning consultation: 18/00330/F. Amendments. Part Full/Outline. Redevelopment of Anglia Square and adjacent land on Edward Street for up to 1250 dwellings.
Location: Anglia Square Including Land And Buildings To The North And West, Norwich NR3 1DZ**

Having previously commented on the original Habitats Regulations Assessment (HRA) report in our letter to Norwich City Council dated 4 May 2018 (our ref; 243107), our comments in this letter focus on the recently produced *Note of Clarification to Provide Further Information for the Habitats Regulations Assessment Pursuant to Regulation 63 of the Conservation of Habitats and Species Regulations 2017*, dated November 2018, by Ecology Solutions (hereafter referred to as the '*Note of Clarification*').

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

SUMMARY OF NATURAL ENGLAND'S ADVICE

NO OBJECTION - SUBJECT TO APPROPRIATE MITIGATION BEING SECURED

We consider that without appropriate mitigation the application would: in combination with other housing developments in the Greater Norwich area lead to increased recreational pressures which would

- have an adverse effect on the integrity of The Broads Special Area of Conservation (SAC), Broadland Special Protection Area (SPA) and Broadland Ramsar
- damage or destroy the interest features for which the component Sites of Special Scientific Interest of the above sites have been notified.

In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures are required:

- on-site green infrastructure measures as described in the application documents should be secured; and
- a proportionate financial contribution to the existing off-site GI and local GI initiatives, to help to reduce the effects of recreational pressures on designated sites.
-

We advise that an appropriate planning condition or obligation is attached to any planning

Norwich City Council, as the planning authority, is the competent authority as defined under the Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). Natural England's role is to provide advice in relation to the HRA documents produced in relation to the application. Natural England notes that the HRA has not been produced by your authority, but by the applicant. As competent authority, it is your responsibility to produce the HRA. We provide the advice enclosed on the assumption that your authority intends to adopt the HRA to fulfil your duty as competent authority.

The *Note of Clarification* concludes that it is possible to rule out the likelihood of significant effects arising from the proposal in relation to increased recreational pressures alone or in combination with other developments.

The Greater Norwich Joint Core Strategy (JCS) was adopted in March 2011 with amendments adopted in January 2014. The Appropriate Assessment (AA) of the JCS highlighted the need for consideration of hydrological impacts on Natura 2000 sites¹; and identified the need for green infrastructure (GI) provision to mitigate potential in-combination and cumulative effects associated with recreation impacts on international sites resulting from the JCS growth proposals. The principle being that if attractive GI is available close to new homes, residents will use that for their regular day-to-day recreation rather than visiting Natura 2000 sites.

The AA highlighted some areas of uncertainty regarding potential in combination and cumulative effects associated with growth and tourism (together with other issues) because of the dependence on the effectiveness and implementation of mitigation measures and actions required to avoid adverse impact on site integrity. The mitigation measures suggested were:

- The implementation of green infrastructure developments
- The allocation of greenspace to protect specific natural assets and designated sites to be implemented through area action plans (AAP).

The importance of providing suitable and accessible GI is reflected in the relevant policies in the JCS.

Appropriate Assessment

On the basis of information provided, it is the advice of Natural England that **it is not possible** to conclude that the proposal is unlikely to result in significant effects on the European sites in question. This is because **there will be in combination effects** with other allocated housing sites in the Greater Norwich Joint Core Strategy (JCS) (as evidenced in the HRA for the JCS and subsequently reflected in local spatial plan policies).

It is a requirement of the Habitats Regulations to consider the impacts of projects **either alone or in combination** at both the Likely Significant Effect (LSE) screening stage and during the Appropriate Assessment (AA) stage. There are likely effects from the proposed development but they are not significant alone. When the present application is considered for any potential LSEs that may arise in combination with other plans and projects ie with other new residential development which could affect Natura 2000 sites in the Broads, there is a LSE, and so these go through to the AA together and the assessment is done in combination.

It is only the appreciable effects of those plans and projects that are not themselves significant alone which are added into an in-combination assessment, which in this case are the effects of recreational disturbance (on the features of interest for which the Natural 2000 sites were designated). When considered in combination with other new housing proposals there is a combined effect of recreational disturbance on these sites.

¹ These are Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar sites.

At AA stage, subject to inclusion of satisfactory mitigation, which may involve both on-site and off-site measures, it may be possible to ascertain that a proposal will not adversely affect the integrity of the designated site. Where there is an adverse effect or it is uncertain, then conditions or planning obligations may be used to enable it to be ascertained that the proposal would not adversely affect the integrity of the site. Permission may then be granted subject to the conditions or obligation identified.

One way of off-setting the impacts of this development proposal is to provide suitable and accessible Green Infrastructure (GI) to attract and meet peoples' needs locally. Clearly it is difficult to provide this type of GI on-site for this development, given the urban nature and constraints of the application site. However, by making a proportionate contribution to the existing off-site GI and local GI initiatives, as already identified in the *Note of Clarification*, this would help to reduce the effects of recreational pressures on Natura 2000 sites further afield. This would be sufficient, in the case of this development, to conclude no adverse effect on Natura 2000 sites, in combination with other JCS allocations."

Greater Norwich Infrastructure Plan June 2018

Following the email of our draft response to Peter Hadfield, of Ecology Solutions, and you, sent on 19 November 2018, I have received an email reply from Peter on the same date. He confirmed that they did not dispute our advice regarding in combination effects and the AA. Where he did disagree was in relation to the off-site funding contribution. Having re-examined the *Greater Norwich Infrastructure Plan June 2018* that was referred to in the *Notice of Clarification*, under 1.5 it states:

While mainstream funding provides the primary support for new infrastructure, contributions from new development, such as Section 106 agreements and Community Infrastructure Levy are also important.

And under 2.3 of the document it states:

Estimates for the total forecast amount of CIL collected over the plan period have reduced over previous years, in part due to the increase in exemptions granted. The GNGB are considering undertaking a review of CIL which would in part consider forecasting.

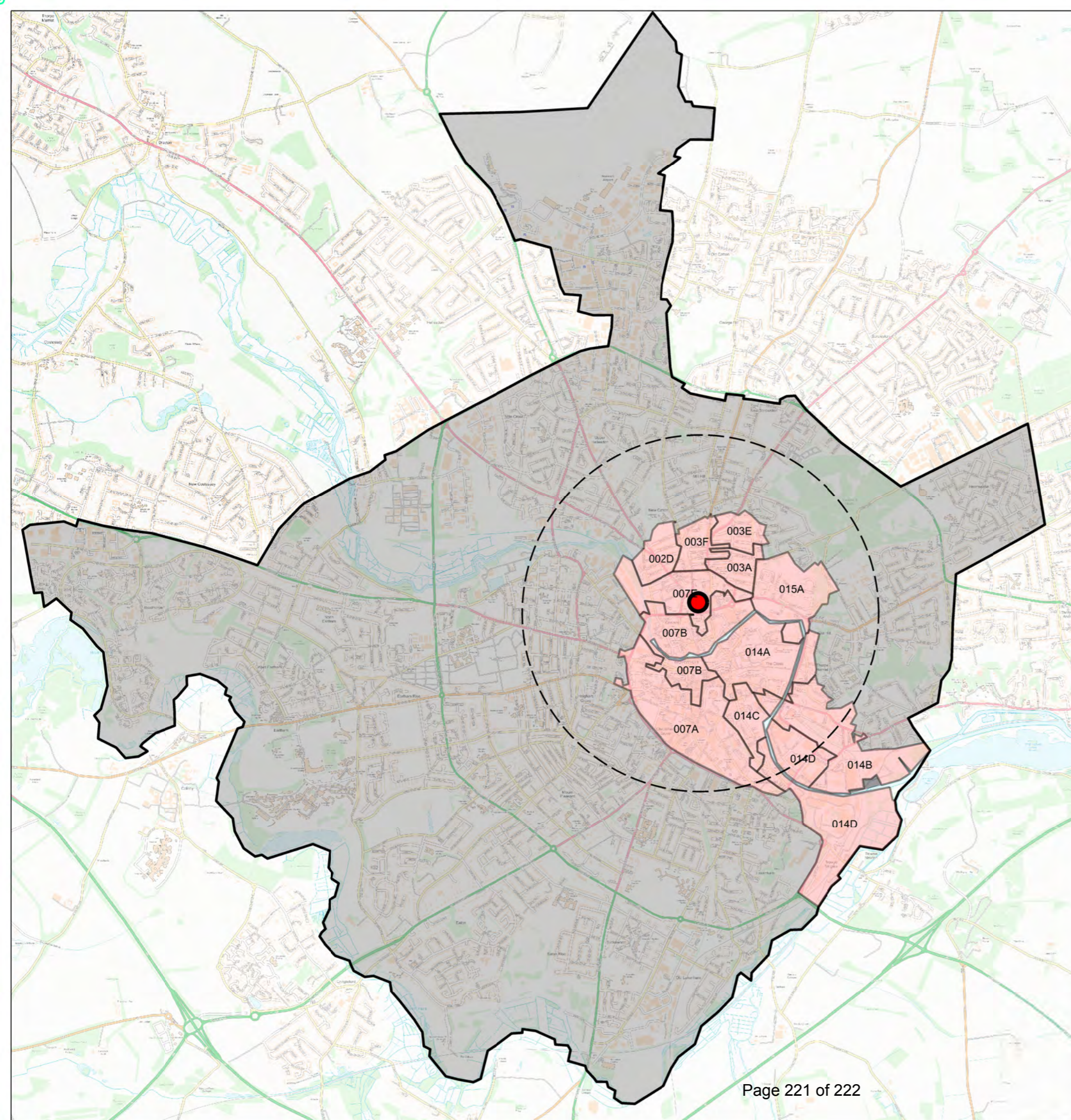
The Local Plan policies JCS1, together with DM3, DM6 and DM8, support the idea that new housing development should contribute towards the provision of off-site GI as part of a package of mitigation measures to ensure that there is no additional increase in recreational pressures on designated sites.

If you have any queries relating to the advice in this letter please contact me on 020802 64893.

Should the proposal change, please consult us again.

Yours sincerely

Louise Oliver
Norfolk and Suffolk Team



Local Impact Area Includes the following LSOAs:

- 002D 007E
- 003A 014A
- 003F 014B
- 003E 014C
- 007A 014D
- 007B 015A

Wider Impact Area

Site Location

1600m radius (20 min walking distance)

Client
Weston Homes

FLITCROFT HOUSE, 114-116 CHARING CROSS ROAD
LONDON WC2H 0JR

T. +44(0)20 3640 8508
W. mail@iceniprojects.com



Project
Anglia Square

Job Ref. 16-053 Drawn NM

Drawing Title
Local Impact Area Location

Scale 1:35000@A3 Date 02.03.18
Drawing no. 004 Rev.

