



Ms Tracy Armitage
Norwich City Council
City Hall
St Peter's Street
NORWICH
Norfolk
NR2 1NH

Direct Dial: 01223 582738

Our ref: P01486034

31 May 2022

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, ANGLIA SQUARE, NORWICH**

**Application No. 22/00434/F - Hybrid (Part Full/Part Outline) application for the
comprehensive redevelopment of Anglia Square, and car parks fronting Pitt
Street and Edward Street**

Thank you for your letter of 21 April 2022 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England objects to the application on the grounds it would harm the historic character of Norwich and fail to meet the aspirations of the planning system of sustaining and enhancing the significance of heritage assets and creating well-designed places that respond to local character and distinctiveness.

Norwich is one of England's finest historic cities, steeped in over 1000 years of history.

The existing failed and incomplete Anglia Square development detracts from the historic city and we are keen to see it sympathetically redeveloped and townscape repaired.

There are aspects of the proposal that would have a beneficial impact on the historic city, notably the partial repair of the historic street pattern and the replacement of the existing buildings with a more considered design.

However, the scale of the development would be much greater than that of the historic city. It would perpetuate the scale of the existing development and extend this across



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the site. This, and the character of the buildings, would harm the significance and historic character of Norwich. It would fail to take the opportunity to repair the damage of the past.

It would cause a high level of harm to the significance of St. Augustine's Church (grade I) and 2-12 Gildencroft (grade II) and harm to other listed buildings including those on St Augustine's Street, Magdalen Street and to Doughty's Hospital (grade II). It would harm the Norwich City Centre Conservation Area.

The proposal is at odds with legislation, national and local policy and guidance. This sets out the importance of sustaining and enhancing historic places and making a positive impact on local character and distinctiveness. These requirements are also reflected in national policy and guidance on good design. The local policy requirements reinforce this.

On these grounds Historic England object to the application. We continue to recommend that the quantum and scale of development is significantly reduced. In this way, the redevelopment of Anglia Square could be achieved in a way which removed the present blight, provided much-needed housing and other facilities and responded fully to Norwich's exceptional historic character.

Should, notwithstanding this, your Council broadly accept the case for the proposal, there remain significant improvements that could be made. We acknowledge notable positive changes have been made following the Inquiry scheme and pre application discussion. We feel these could be increased through further amendment of aspects of the scheme. In particular, at the south east and north western parts of the development where it has the greatest impact on the historic environment. We would be pleased to discuss these further with you and the applicant.

Historic England Advice

The proposal

The application seeks consent for the comprehensive redevelopment of Anglia Square for up to 1,100 homes, up to 8,000sqm flexible retail, commercial and other non-residential floorspace including a community hub and up to 450 car parking spaces and associated highway and public realm works. It is a hybrid application, with detailed consent being sought for the northern and eastern parts. The development would comprise 14 buildings of one to eight storeys.

Significance

Norwich is a place of exceptional significance, archaeological, architectural, artistic and historic. Set in the valley of the River Wensum, it embodies over 1000 years of settlement. The present-day pattern of streets and spaces originated in the Saxon and



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Norman periods. Tombland with its Saxon origins and the Norman Market Place and adjacent grid street pattern remain at the heart of city life today.

The medieval city walls were built from the mid-13th century, enclosing the second largest city in England in this period. Many sections of these walls survive today. The entire area of the medieval walled city is designated as the Norwich City Centre Conservation Area. It is a conservation area of exceptional richness and character.

The streets are lined with an astonishing wealth of historic buildings and monuments from across the centuries. The major landmark buildings lie on the south side of the city. The Norman castle and medieval Romanesque cathedral are buildings of European significance. The other landmark buildings including the Roman Catholic Cathedral and City Hall illustrate later religious and civic development. The surviving 35 medieval churches are without equal in number in northern Europe. These buildings are interspersed with an exceptional collection of buildings from the late 16th century onwards. These include merchants' houses, Georgian town houses, commercial and industrial buildings and others.

The landmark buildings and many of the churches rise above the townscape. Enhanced by the topography, these create a varied skyline and, together with the other buildings, many characterful scenes across the city.

Anglia Square stands within the northern part of the city. Its site was part of the Saxon settlement and lies within the city walls. The construction of Anglia Square and St. Crispin's Road severely harmed the character of Norwich. Its 1960/70s buildings are an alien presence in the cityscape. The disuse of the greater part of the development has rendered it a blight. This is reflected in the assessment of the Anglia Square character area within the conservation area appraisal.

There are two locally listed buildings in the south west corner of the site. There are live applications for the listing of these buildings. These are being assessed by Historic England's listing team and a recommendation will be made to the Secretary of State for Digital, Culture, Media and Sport who determines these. There will also be the archaeological significance of the site to consider.

The environs of Anglia Square retain their historic interest. The neighbouring character areas to Anglia Square are rated in the conservation area appraisal: Colegate as being of high significance and the Northern Riverside and Northern City as significant.

A network of historic streets converges or borders on Anglia Square.

Colegate runs parallel with the river, from which smaller streets run northwards towards Anglia Square. The Colegate character area has many listed buildings of



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great historic and architectural value including a number of 18th-century townhouses, Non-conformist chapels and churches.

Magdalen Street, the principal street leading north from the centre of the city runs along the eastern side of the application site. St. Augustine's Street is to the north west and joined Magdalen Street by way of Botolph Street until Anglia Square was built. They are lined with historic buildings many of which are listed or locally listed.

St. Augustine's Church, grade I, lies immediately to the west of Anglia Square. Set within its churchyard, the brick tower forms a landmark and the church and terrace, 2-12 Gildencroft, are an attractive grouping at the southern end of St. Augustine's Street. 71 Botolph Street, grade II*, with its 15th-century undercroft, also forms part of this group together with the other buildings on St. Augustine's 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. Those on Sussex Street are listed grade II and locally listed.

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. These are scheduled monuments. 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.

Impact of the proposals on Norwich's historic character

The scale of the proposed development would contrast markedly with that of the historic townscape of Norwich. There are aspects of the scheme that would improve on the existing development, especially in its present, degraded, state. The layout of the development would help to repair the historic street pattern and improve connectivity in the area. The architectural character of the buildings would also improve on that of the existing. However, the scale and character of the development would result in harm.

The proposed development would harm the historic character of Norwich and the significance of a range of designated heritage assets, notwithstanding the several aspects of the scheme which would be beneficial. It would cause a high level of harm to listed buildings in its immediate environs, including St. Augustine's Church (grade I), Gildencroft (grade II) and harm to other listed buildings including those on St Augustine's Street, Magdalen Street and to Doughty's Hospital (grade II). It would harm the Norwich City Centre Conservation Area as whole, with the most significant effects being on the Anglia Square and Northern City character areas.



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a) Layout

The layout would repair something of the fractured historic streetscape and improve the connectivity of the site with the surrounding townscape. It reflects the historic street pattern. The routes across the site broadly follow earlier streets, although incorporating the modern insertion of Anglia Square. Botolph Street would be reinstated to run west to east, linking St Augustine's Street with Magdalen Street. Smaller lanes would provide a second west to east route. St George's Street would run north to south, and, again, smaller lanes would offer a secondary route. This would have a beneficial impact on the conservation area and neighbouring listed buildings.

b) Scale and character in relationship to the historic townscape

The development would contrast and stand out from the historic city rather than integrating with it. The height and mass of the development would be much greater than that of the historic cityscape.

The buildings would be markedly taller, longer and deeper than those of the historic city. Many of the historic buildings in the city are modest in height, not more than four storeys. Many of those in the area of Anglia Square are two or three storeys. Even when compared to some of the larger later 19th and 20th-century industrial buildings, of which there were a couple in area of Anglia Square, the scale of the proposed blocks is much greater. The proposed buildings would rise to up to eight storeys with the majority being between four and eight storeys.

The maximum height of the new development is equal to that of Sovereign House. The development would therefore not only match the scale of the existing buildings on site, but would add to their bulk and volume by building on the extensive open land to the west.

The greatest impact of the scale of the development would be on the immediate surroundings of Anglia Square. Here the contrast between the scale of the surrounding historic townscape and the new development would be starkly apparent, both in views from the neighbouring streets and spaces and when moving between the old and new parts of the townscape. The contrast in scale is seen in the cross-sections illustrating the new development.

Within St Augustine's churchyard the height and expanse of the development would be clearly apparent. It would harm the significance of the church and neighbouring listed buildings.

The large medieval church with its bold red brick tower is a local landmark and attractively set in the green space of its churchyard. It is framed to the south by the





16th-century terrace, 2-12 Gildencroft, and terminates the southern end of St. Augustine's Street. This contributes positively to its significance. However, the setting to the south east, with the car park and bulky form of Sovereign House seen rising above the northern end of Gildencroft, detracts from this composition.

The redevelopment of Anglia Square, which incorporates the current car park, would bring buildings much closer to the churchyard. The buildings would be up to six and seven storeys along Pitt Street and eight storeys in the centre of the development. These would rise high above Gildencroft and extend to the south, having an overbearing effect.

The horizontal emphasis of the roofscape responds to the linear character of the Gildencroft buildings, but the contrast in height would have a harmful effect. It would intrude into this historic space, detracting from this grouping and the intimate character of the churchyard. Because these buildings form part of the outline application, it is not possible to consider how the architectural treatment of these might affect the significance of these buildings. These views can be seen in views 23 and 24 in the Heritage, Townscape and Visual Impact Assessment.

In views down St Augustine's Street to the development and northwards from it, this contrast in scale, both height and unit size, would also be marked and discordant. The street has a strong historic character, lined, in the main, by listed and locally listed modest two storey buildings with the church at the southern end. Sovereign House terminates the view to the south and detracts from its historic character.

The scale of the new development would perpetuate this over-scaled termination of the street. The architectural treatment of the proposed replacement buildings should offer improvements on that of the Sovereign House, but as this forms part of the outline application this is not apparent at this stage. Assuming this were to be achieved, the scale would have a negative impact on the character of the street, and detract from the harmony of the street scene and its listed buildings (views 12 and 13).

The contrast in scale and design of Block D and the buildings along St. Augustine's Street would be harmful. Block D would lie to the east side the southern end of St. Augustine's Street on New Botolph Street. It would be six storeys high at its tallest point, with a curved form and has been designed as a landmark using a contrasting white brick. It fails to respond to the context, contrasting with the built form and identity of the historic townscape in this location.

Beyond St. Augustine's Street, looking down into the conservation area from Aylesham Road, the height of the proposed buildings would also be apparent. Here one of the taller buildings would be seen to the left of the cathedral spire, encroaching on and detracting from the spire as a focal point (view 11).





From further north on Aylesham Road Sovereign House is very dominant and detracts from an appreciation of the Cathedral spire. The proposed view may be an improvement, lowering the height of this part of the development, although the greyscale depiction makes it difficult to clearly see the proposal (view 37).

The scale of the proposed development would be apparent from the north around the junction of Edward Street and Magpie Road. This area has a mixed character and the bulk of the existing Anglia Square buildings is apparent. However, the modest terraces of the neighbouring streets, Leonard and Esdelle Streets, run west from here. The proposed development would have an improved and more varied architectural character than the existing buildings but, again, would perpetuate the bulk of the existing development (view 15).

The proposed development along Magdalen Street, the street frontage to Block K, offers some improvements. Magdalen Street, one of the oldest routes into the city, retains a high concentration of listed buildings. The section bordering Anglia Square is more mixed with the intrusive and incongruous elements of Anglia Square and the modern building opposite. However, it retains one listed and many locally listed buildings on its eastern side which are generally three storeys in height.

The new building along Magdalen Street would improve this section of the street. The replacement of the parade of shops with its over sailing jetty is welcome. The proposed building would be set a little further back, improving the width of the pavement although maintaining the linear characteristic of the street. At four storeys, it would be of a larger scale than the historic two and three storey properties. However, its architectural character would be more sympathetic. The building would reintroduce a reference to traditional building plots with vertical breaks in the façade, façade treatments and the separation of the dormers (views 25 and 31).

The new building at Stumps Cross on Magdalen Street, Block L, would be too tall and assertive in its character. Neither the height nor the design would relate to the surrounding context. It has been designed as a focal point, reinstating one lost to the 1960s/70s development. A building that addresses Stumps Cross would be positive. However, the generous four stories, articulated in an assertive grid-like facade, would be out of scale with the adjacent traditional buildings, as well as stylistically at odds with them. The proposed corner building would also not relate to the proposed design of the new terrace buildings to north and south of it on Magdalen Street, making the whole composition lack coherence. The odd juxtaposition with the new terrace is seen in views 25 and 31.

To the south building J3 would address Stumps Cross and be appropriately scaled, but the façade material and design bear less relation to their context. At three- stories, the building would be in keeping with the scale of traditional buildings on the street. Its façade has a rhythm and verticality from the dormers, the framing of which runs





through the façade. The choice of a black brick, however, is quite incongruous, particularly seen next to the white brick used for the adjacent Stumps Cross building and red brick of the traditional buildings. The north elevation seen at an angle from Magdalen Street presents a large area of blank wall, which seems undesirable, given its role in leading into the development beyond.

Cowgate to the east of Anglia Square is lined with modest terrace buildings and terminated by the unsightly existing multistorey car park. The new building would maintain this height although the architectural character would be an improvement on the existing (view 26).

As a result of pre application discussions, the impact on Doughty Hospital has been reduced although there would still be some harm. The Hospital lies to the south of Anglia Square on the other side of St. Crispin's Road. It is a courtyard arrangement of almshouses dating from the 19th-century, listed grade II. The existing Gildengate House rises up above much of the northern range detracting from the enclosed, secluded character of the courtyard. The new development would still rise above the two-storey building, resulting in a measure of harm. However, the amendments during the pre-application process to split the buildings behind into two blocks would be less overbearing (view 32).

c) Impact on the wider cityscape

The presence of the development, rising above the pattern and grain of the surrounding streets, would harm the appreciation of Norwich's historic character as experienced from the high ground to the east of the city.

The mass of the proposed development would be greater than that of Anglia Square and its impact larger. Anglia Square rises incongruously from the surrounding cityscape in these longer views. The proposed development would be below the skyline and in height largely consistent with that of the existing development. However, the mass would be larger. The prominence of the development, running counter to the pattern of Norwich's historic development, would detract the appreciation of Norwich's historic cityscape, and that of the conservation area, in these exceptional views (view 7).

d) Architectural character of the proposals

The architectural character of the proposed development improves markedly on that of the existing buildings, but it lacks the variety and interest of the historic city. As has been discussed, the height and depth of the blocks is much greater than that of the traditional buildings.

We acknowledge that efforts have been made to break up the mass and articulate the



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elevations. This is most successfully achieved in the perimeter blocks along Edward Street and the frontage of Block K to Magdalen Street. There is also some variety in height to the buildings along Botolph Street. The application shows consideration of the local context to inform façade treatments.

Despite this, the scale of the blocks and regular use of floor heights and windows inevitably creates grid like patterns across the facades. The proposals lack the variety and detail found in the historic city. Some of the façade treatments to Edward Street and Block C are rather bland and generic in character.

To summarise, the scheme has positive elements, namely the partial repair of the historic streetscape and the improved architectural character of many of the buildings. However, the scale and architectural character would contrast with the existing townscape and cause harm. This would be harm of a high level to St. Augustine's Church and 2-12 Gildencroft. There would also be harm to other listed buildings including those on St. Augustine's Street and Magdalen Street and Doughty Hospital and the Norwich City Centre Conservation Area.

Legislation, National Policy and Guidance

a) National law and policy

The Planning (Listed Buildings and Conservation Areas) Act 1990 establishes that in considering applications for planning permission for development which affect 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).

The National Planning Policy Framework (NPPF) identifies the protection and enhancement of the historic environment as an important element of sustainable development and establishes a presumption in favour of sustainable development in the planning system (paragraphs 7 and 8). Paragraph 8 states that the planning system has three overarching objectives which need to be pursued in mutually supportive ways to achieve sustainable development, including the protection and enhancement of the built and historic environment. The NPPF places great weight upon the conservation of designated heritage assets, and the more important the asset, the greater the weight should be (paragraph 199).

In this case we would stress that some of the buildings affected by the proposed development are listed at grade I and II* and so fall within the top 5.5% of listed buildings nationally, making adherence to the statutory duty even more critical in the determination.



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The NPPF also states that the significance of listed buildings and conservation areas can be harmed or lost by development in their setting (paragraph 200). Paragraph 206 states that the Council treat favourably proposals that preserve those elements of conservation areas and the setting of designated heritage assets that make a positive contribution to or better reveal the significance of heritage assets.

In determining applications local planning authorities should take account of the desirability of sustaining and enhancing heritage assets, the positive contribution that conservation of heritage assets can make to sustainable communities and the desirability of new development making a positive contribution to local character and distinctiveness (paragraph 197). The significance of a heritage asset should be taken into account to avoid or minimise any conflict between its conservation and any aspect of the proposal (paragraph 195).

As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification (paragraph 200). 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, including securing its optimum viable use (paragraph 202).

Paragraph 126 of the NPPF notes the great importance attached to the design of the built environment and that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people. Paragraph 130 states that design policies and decisions should aim to ensure that developments are 'sympathetic to local character and history, including the surrounding built environment.'

The National Design Guide begins stating "The National Planning Policy Framework makes clear that creating high quality buildings and places is fundamental to what the planning and development process should achieve."

The National Design Guide expands on the NPPF's requirement for good design which responds to historic context. Paragraph 51 states that 'well-designed places, buildings and spaces have a character that suits the context [and] its history'. Furthermore, 'well-designed new development should be influenced by an appreciation and understanding of vernacular, local...character, including existing built form...and local architectural precedents. When responding to existing local character in proposed designs it is particularly noted that considering 'the height, scale, massing' of these local buildings is important as is the 'variety, pattern and proportions of windows and doors' in façade design (paragraph 53).

Allied to the National Design Guides approach to achieving good design in historic areas is Historic England's Good Practice Advice Note 3; The Setting of Heritage



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Assets (2017) which provides advice assessing the setting of heritage assets, the contribution it makes to their significance and the impact of the development on it.

b) Local Policy

The emerging Greater Norwich Local Plan (GNLP) allocates Anglia Square for residential-led mixed use development. Whilst the Regulation 18 Plan allocated the site for around 1200 dwellings, this was reduced to around 800 dwellings at Regulation 19 stage. The Examination in Public hearing for the GNLP considered the capacity of the site and in particular emphasised the importance of the precise quantum of development, mix of uses and detailed design being informed by a consideration of the factors listed including factors such as heritage impact. Whilst the emerging GNLP is not yet adopted and is still at Examination in Public, it is a material consideration in the determination of the application.

With the process of the emerging GNLP still ongoing Norwich City Council's Adopted Local Plan of 2014 remains relevant and while Anglia Square is not specifically identified in the Adopted Plan 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. As an adopted Supplementary Planning Document or site allocation in an Adopted Local Plan has not been produced since 2017 the Policy Guidance Note is still a relevant consideration and is referred to by the applicants in their Planning Statement (Chapter 5, planning policy).

The Anglia Square Policy Guidance Note responds to the form and nature of development proposed at the time it was written rather than being a comprehensive options appraisal for the development of the site. However, while it does not draw conclusions about the scale of new development it makes some general observations regarding the way development should respond to the conservation area and setting of nearby designated heritage assets.

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).



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Historic England's position

There have been positive improvements to the scheme that has emerged following the Inquiry and as a result of the pre application discussion. Historic England recognises the revised proposals represent a significant change from the previous scheme. That proposal would have caused a severe level of harm to Norwich's character. In refusing the application the Secretary of State acknowledged the benefit of replacing modern buildings and increasing permeability but also found the scale, bulk and massing of the proposal was not sympathetic to the conservation area. He found there was harm of a high level to St. Augustine's Church and Anglia Square. The current proposal would result in less harm, particularly to the conservation area as a whole.

The proposal would improve on the existing development, especially in its current, failing state. The reinstatement of something of the historic street pattern, the enhancement of connectivity and the replacement of poor buildings with new buildings of more sympathetic design would have a beneficial impact on the historic environment.

However, this must be set against the considerable increase in the overall mass of the development. Historic England consider that despite improvements on the existing development and previous design, the proposal would perpetuate and to a degree exacerbate the harm of the existing development through consolidating and expanding its mass.

It would harm the significance and historic character of Norwich, causing a high level of harm to the significance of St. Augustine's Church and Gildencroft, and harm to that of other listed buildings including those on St. Augustine's Street, Magdalen Street and Doughty Hospital and the Norwich City Conservation Area.

The legislation and national policy emphasise the importance of sustaining and enhancing heritage assets and this is reinforced with local policy. The policy notes that the more important the heritage asset, the greater that weight should be. Given the exceptional significance of the historic city of Norwich, this should be weighed very heavily (NPPF 199).

The NPPF and local development management policies together with the government's National Design Guide stress the importance of well-designed places and ones that respond to local character and distinctiveness (NPPF 126, 130, 197 & 206; Local Plan policy DM3 (c); National Design Guide 51 & 53). The Anglia Square Guidance Note emphasises the need to respect the historic context (paragraph 3.18, 3.23).



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Throughout these documents, the emphasis is not just on preserving and sustaining but enhancing historic places (NPPF 8 (c), 197; Local Plan DM1, DM3, DM9; Anglia Square Policy Guidance Note 7.87). The application fails to realise the opportunity to repair the damage to the historic townscape of the existing development, despite doing something to this end.

The justification for the quantum of development is the viability of the scheme. We do not have the capacity to undertake a detailed review of this. We would strongly encourage your Council to commission an independent detailed review of the work. This should consider not merely the figures, but the possibility that different approaches to development would produce different results. If the viability appraisals generate a scheme that is inappropriate to the character of Norwich, the assumptions on which the calculations rest should be revisited, including land value.

Any harm or loss of significance should require clear and convincing justification in line with national policy. Where this is less than substantial harm, this should be weighed against the public benefits. The application sets out the public benefits the applicant considers the scheme would deliver. However, your authority should consider whether an alternative, less harmful approach, could also deliver a number of public benefits including the conservation and enhancement of the historic city in line with paragraph 8 of the NPPF which requires the three overarching objectives, economic, social and environmental, should be pursued in mutually supportive ways..

Historic England object to the current application due to the high level of harm that would be caused to the significance of St. Augustine's Church and 2-12 Gildencroft, and harm to that of other listed buildings on St. Augustine's Street, Magdalen Street and Doughty Hospital and the Norwich City Conservation Area.

We continue to recommend that there should be a significant reduction in the quantum and scale of the development proposed. The current application is for up to 1100 dwellings. The allocation in the emerging Greater Norwich Local Plan is for 800 homes.

Historic England have advised a development of 600 homes would be more appropriate. This is on the basis of the work Historic England commissioned from Ash Sakula Architects in the context of the public inquiry. This showed that it might be possible to undo the damage done by the existing development through a development that provides much needed housing and community facilities and at the same time reinforces and adds to the historic character of the city.

Clearly any meaningful reduction in the quantum of the current proposal would help to deliver a scheme which could be more sympathetically scaled.

If your Council should accept the case for what is proposed in broad terms, there are



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improvements that could be made to the proposal which would reduce the level of harm. We would strongly encourage your authority to explore these with the applicant, stressing the policy guidance to avoid or minimise harm between conservation and the proposal (NPPF 195). We would be very happy to advise further in this regard.

If further amendment is undertaken, we would recommend the following:

The parts of the historic townscape most affected by the proposals are St. Augustine's Church and Street and Gildencroft and Magdalen Street. We therefore recommend that focus of revisions is on delivering improving a more sympathetic relationship between the historic townscape and the proposed development in the north west and western area of the site and south eastern corner.

With regard to St. Augustine's Church and Gildencroft, we recommend the height of the buildings along Pitt Street, seen over Gildencroft (blocks E and F) is reduced to lower the impact in this area.

The design of the northern end of Botolph Street, encompassing Blocks D and E should also be rethought. This part of the scheme should respond to the historic townscape of St. Augustine's Street. It should reinforce the pattern of the traditional townscape and its sense of enclosure. The height should be reduced to step down as the development approaches St Augustine's Street. This would help to soften the transition between the scale of the larger buildings proposed at the centre of the site with the modest scale of the historic buildings on St. Augustine's Street.

On Magdalen Street the Stumps Cross building should be redesigned to respond to the historic character of street. We recommend it is reduced in height and a more traditional pitched roof adopted. It should be possible to provide a building which forms a focal point to Stumps Cross and responds to the linear and modest plot widths on Magdalen Street.

Further consideration might also be given to the materials and north elevation of block J3.

Recommendation

Historic England objects to the application on the grounds of the high level of harm that would be caused to the significance of St. Augustine's Church and Gildencroft and the harm to other listed buildings on St. Augustine's Street and Magdalen Street and Doughty Hospital and the Norwich City Centre Conservation Area. This proposal fails to comply with legislation and national and local policy.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 7, 8, 130, 195, 197, 200 and 206.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
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In determining this application you 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 listed buildings or their setting or any features of special architectural or historic interest which they possess. And in addition, 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, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Yours sincerely

Clare Campbell

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Team Leader - Development Advice

e-mail: clare.campbell@HistoricEngland.org.uk



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
HistoricEngland.org.uk



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Ms Tracy Armitage
Norwich City Council
City Hall
St Peter's Street
NORWICH
Norfolk
NR2 1NH

Direct Dial: 01223 582738

Our ref: P01486034

11 August 2022

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, ANGLIA SQUARE, NORWICH
Application No. 22/00434/F**

Thank you for your letter of 28 July 2022 regarding further information on the above application for planning permission. On the basis of this information, we offer the following advice to assist your authority in determining the application.

Summary

Historic England provided advice on the initial application in a letter dated 31 May 2022.

We objected to the application on the grounds the proposed development would harm the historic character of Norwich, one of England's finest historic cities. It would also fail to meet the aspirations of the planning system to sustain and enhance the significance of heritage assets and to create well designed places that respond to local character and distinctiveness.

The revisions, while resulting in modest improvements to aspects of the scheme, do not address Historic England's objections to the scheme. The revised proposal remains of a much greater scale than the historic city. This, and the character of the development, would harm the significance of the historic city and several listed buildings within the immediate area. As such it is at odds with legislation, national and local policy and guidance.

We remain keen to see Anglia Square sympathetically redeveloped and the historic townscape repaired. This proposal would not achieve that objective.



24 BROOKLANDS AVENUE, CAMBRIDGE, CB2 8BU

Telephone 01223 582749
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This letter provides a summary of Historic England's position as set out in our previous letter, taking into account the revisions to the proposals. It should be read in conjunction with our earlier advice.

Historic England Advice

Significance

Norwich is a place of exceptional significance, archaeological, architectural, artistic and historic. It embodies over 1000 years of history. The street pattern originated in the Saxon and Norman periods and is defined by an astonishing wealth of historic buildings and monuments from across the centuries. The Norman Castle and medieval Romanesque cathedral are buildings of European significance. The surviving 35 medieval churches are without equal in number in northern Europe. These are interspersed with an exceptional collection of buildings from the late 16th century onwards. The historic city is defined by the medieval walls, which were built from the mid-13th century and many sections of which survive today. It is designated as the Norwich City Centre Conservation Area.

Anglia Square stands in the northern part of the city. This was part of the Saxon settlement and lies within the city walls. The construction of Anglia Square severely harmed the character of Norwich. However, the surrounding network of historic streets are lined with many listed and locally listed buildings and retain their historic interest. These include St Augustine and Magdalen Streets and St. Augustine's Church (listed grade I).

Impact

The scale of the proposed development would contrast markedly with that of the historic townscape of Norwich. There are aspects of the scheme that would improve on the existing townscape, particularly in its present, degraded, state. The layout would help to repair the historic street plan and improve connectivity. The architectural character would also improve on that of the existing. However, the scale and character of the development would result in harm.

The development would cause a high level of harm to the listed buildings in the immediate environment including St Augustine's Church (grade I), 2-12 Gildencroft (grade II) and harm to other listed buildings on St. Augustine's Street and Magdalene Street and to Doughty's Hospital (grade II). It would harm the Norwich City Centre Conservation Area.

a) Layout

The layout would repair something of the fractured historic streetscape and improve



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connectivity. This would have a beneficial impact on the conservation area and neighbouring listed buildings.

b) Scale and character in relationship to the historic environment

The development would contrast and stand out from the historic city. The height and mass would be much greater than that of the historic cityscape. Many of the historic buildings are modest in height, often two or three storeys and not more than four. The proposed building would rise to eight storeys, the majority being between four and eight. The maximum height of the development would match that of Sovereign House, but by covering a larger area of currently undeveloped land to the west, it would add to the bulk and volume of the development on the site.

The greatest impact would be on the immediate surroundings of Anglia Square. Here the contrast in scale between the historic townscape and new development would be starkly apparent.

St. Augustine's Church is a local landmark and forms an attractive group set within its churchyard, framed by 2-12 Gildencroft to the south, and terminating the characterful run of buildings along St Augustine's Street. The existing Anglia Square development to the south east detracts from this composition.

The proposed redevelopment would bring substantial buildings close to the churchyard and southern end of St. Augustine's Street. The contrast in height would have an overbearing and discordant effect (views 12, 13, 23 & 24).

The revisions to reduce the height of Building D, in the north west corner of the site to the south of St. Augustine's Street, by one storey offer an improvement on the initial scheme. This results in a moderately less overbearing impact in the context of the church and the buildings at the south of St Augustine's Street. However, the form and height of Block D fails to respond to its context and the height and bulk of the scheme as a whole remains overly dominant and harmful.

A further revision introduces a flat roof in place of a pitched roof to Block E on Pitt Street which is seen in views from the churchyard. The design was amended to a pitched roof as a result of pre application discussions to lessen the impact of the scheme. Contrary to the assessment in the amended documentation, the flat roof results in a bulky and more dominant form and the pitched roof design should be reinstated.

It remains difficult to provide further comments on the impact of Blocks E, E/F and F on Pitt Street due to the outline nature of this part of the scheme. The amendments to Block E/F suggest more variety to the roofline of the southern stretch of Pitt Street, but without seeing detailed drawings it is not possible to see if there is a corresponding





variety in elevational treatment.

The reduction in the height of part of Block A on the northern side of the site by one storey offers a positive improvement in how the cathedral is appreciated in views from Aylsham Road (view 37). This reduction and that of Block D also lower the height of elements of the scheme seen from the north at the junction of Edward Street and Magdalen Street (view 15). The modest reductions in height represent an improvement. However, overall the development perpetuates the bulk of the existing buildings, even though it would improve on their architectural character. The removal of one entrance to the car park is positive.

Magdalen Street is one of the oldest routes into the city and retains a high concentration of listed buildings. The new parade of shops, Block K, would improve this section of the street and a revision to the dormers has refined this design (views 25 and 31).

The revisions to the Stumps Cross building on Magdalen Street, Block L, have not addressed our concerns. Neither the height or design relate to the surrounding historic context or the new parade of shops described above (views 25 and 31). This misses an opportunity for a new, high quality contextual building.

At the southern end of Magdalen Street, the revision to Block J3 to provide more articulation to the north elevation is welcome. We continue to question the choice of black brick which is quite incongruous in this context.

The impact on Doughty Hospital to the south was reduced as a result of pre application discussions, although the height of the proposals would still result in a measure of harm (view 33).

c) Impact on the wider cityscape

The presence of the development rising above the pattern and grain of the surrounding streets would harm the appreciation of Norwich's historic character when experienced in the exceptional views from the high ground to the east of the city. The reductions in height would have a negligible effect on the impact of the proposed development on these views (view 7).

d) Architectural character of the proposals

The architectural character of the proposed development improves markedly on that of the existing buildings but lacks the variety and interest of the historic city. A small number of design amendments have been made offering minor improvement to individual parts. The revised outline of Blocks E/F and F also show some attempt at greater variety of form (as was previously acknowledge in relation to Edward Street





and Block K) but no significant change has been made to the overarching character of the buildings.

To summarise, the scheme has positive elements, namely the partial repair of the historic streetscape and improved architectural character of many of the buildings. However, the scale and architectural character would contrast with the existing townscape and cause harm. This would be of a high level to St. Augustine's Church and 2-12 Gildencroft. There would also be harm to other listed buildings including those on St. Augustine's and Magdalen Streets and Doughty Hospital and the Norwich City Centre Conservation Area.

Legislation, policy and guidance

Legislation and national policy emphasise the importance of sustaining and enhancing the significance of heritage assets (The Planning (Listed Buildings and Conservation Areas) Act 1990, sections 66 (1) and 72; the National Planning Policy Framework (NPPF) paragraph 197).

The NPPF notes that the more important the heritage asset, the greater that weight should be. Given the exceptional significance of Norwich this would be weighed very heavily (National Planning Policy Framework, paragraph 199).

It continues that any harm should require clear and convincing justification, paragraph 200. Where a proposal would lead to less than substantial harm to the significance of a heritage asset, this harm should be weighed against the public benefits of the proposal, paragraph 202.

The National Planning Policy Framework states that good design is a key aspect of sustainable development and that design decisions should aim to ensure that developments are sympathetic to local character and history, including the surrounding built environment, paragraphs 126 and 130. It continues that development that is not well designed should be refused, paragraph 134.

The government's National Design Guide states in paragraph 51, 'well-designed places, buildings and spaces have a character that suits the context [and] its history.' It continues that considering the height, scale and massing of local buildings is important, paragraph 53.

Local policy in Norwich City Council's Adopted Local Plan flows from and reinforces legislation and national policy in regard to sustaining and enhancing significance, policies DM1, DM3 and DM9; the importance of good design and responding to local character and distinctiveness, DM9.

The Anglia Square Guidance Note emphasises the need to respect the historic context



and enhancing historic places (paragraph 3.18 and 7.78).

Historic England's Position

Historic England continues to consider that Weston Homes' new proposals for the redevelopment of Anglia Square would harm both the significance of important historic buildings and streets adjacent to the site and that of historic Norwich as a whole, as represented by the Norwich City Centre Conservation Area. The amendments to the scheme, while improvements in themselves, do not change this assessment.

There have been positive improvements to the scheme that has emerged following the Inquiry and as a result of pre application discussion. We recognise this proposal represents a significant change from the Inquiry scheme. The current proposal would result in a less harm than the 2018 scheme, particularly to the conservation area as a whole. The revisions offer some improvements, albeit modest in the context of the overall scheme.

The proposals would improve on the existing development, especially in its current, failing state. The reinstatement of something of the historic street pattern, the enhancement of connectivity and the replacement of poor quality buildings with new buildings of a more sympathetic design would have a beneficial impact on the historic environment.

However, this must be set against the considerable increase in the overall mass of the development. Despite improvements on the existing and previous design, it would perpetuate and to a degree exacerbate the harm of the existing development through consolidating and expanding its mass.

It would cause harm to the significance and historic character of Norwich, causing a high level of harm to the significance of St. Augustine's Church and Gildencroft, and harm to other listed buildings including those on St. Augustine's Street, Magdalen Street and Doughty Hospital and the Norwich City Centre Conservation Area.

The legislation and national policy emphasise the importance of sustaining and enhancing heritage assets and this is reinforced with local policy. The policy notes that the more important the heritage asset, the greater that weight should be. Given the exceptional significance of the historic city of Norwich, this should be weighed very heavily (NPPF 199).

The NPPF and local development management policies together with the government's National Design Guide stress the importance of well-designed places and ones that respond to local character and distinctiveness (NPPF 126, 130, 134, 197 & 206; Local Plan policy DM3 (c); National Design Guide 51 & 53). The Anglia



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Telephone 01223 582749
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Square Guidance Note emphasises the need to respect the historic context (paragraph 3.18, 3.23). The proposals run counter to this.

Throughout these documents, the emphasis is not just on preserving and sustaining but enhancing historic places (NPPF 8 (c), 197; Local Plan DM1, DM3, DM9; Anglia Square Policy Guidance Note 7.87). The application fails to realise the opportunity to repair the damage to the historic townscape of the existing development, despite doing something to this end.

Any harm or loss of significance should require clear and convincing justification in line with national policy. Where this is less than substantial harm, this should be weighed against the public benefits. The application sets out the public benefits the applicant considers the scheme would deliver. However, your authority should consider whether an alternative, less harmful approach, could also deliver a number of public benefits including the conservation and enhancement of the historic city in line with paragraph 8 of the NPPF which requires the three overarching objectives, economic, social and environmental, should be pursued in mutually supportive ways.

We understand the difficulty of redeveloping Anglia Square, and note that the applicants place great emphasis on the necessity of development on the scale they propose to create a viable scheme. If, however, their viability appraisals generate a scheme that is inappropriate to the historic character of Norwich, the assumptions regarding the calculations, including land value should be revisited.

It will be for your Council, ultimately, to balance the public benefits that this scheme would procure against the harm to the significance of both listed building and the Norwich City Centre Conservation Area, which we have set out in our letters.

Historic England object to the current application due to the high level of harm that would be caused to the significance of St. Augustine's Church and 2-12 Gildencroft, and harm to that of other listed buildings on St. Augustine's Street, Magdalen Street and Doughty Hospital and the Norwich City Conservation Area.

We continue to recommend a significant reduction in the quantum and scale of development. Even if your Council accept the case for what is proposed in broad terms, the harm could be reduced through further lowering Blocks D, E and E/F, reverting to the pitched roof design for E and revisions to the design of Block D and the Stumps Cross building, Block L.

Recommendation

Historic England objects to the application on the grounds of the high level of harm that would be caused to the significance of St. Augustine's Church and Gildencroft and the harm to other listed buildings on St. Augustine's Street and Magdalen Street and



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Doughty Hospital and the Norwich City Centre Conservation Area. This proposal fails to comply with legislation and national and local policy.

We consider that the application does not meet the requirements of the NPPF, in particular paragraph numbers 7, 8, 130, 134, 195, 197, 200 and 206.

In determining this application you 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 listed buildings or their setting or any features of special architectural or historic interest which they possess. And in addition, 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, please inform us of the date of the committee and send us a copy of your report at the earliest opportunity.

Please contact me if we can be of further assistance.

Yours sincerely

Clare Campbell

Team Leader - Development Advice

E-mail: clare.campbell@HistoricEngland.org.uk



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