

Report to Planning applications committee

Item

27 April 2023

Report of Head of Planning and Regulatory Services

Subject Application no 22/00434/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

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Ward:	Mancroft
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Development proposal

Hybrid (Part Full/Part Outline) application for the comprehensive redevelopment of Anglia Square, and car parks fronting Pitt Street and Edward Street for: up to 1,100 dwellings and up to 8,000sqm (NIA) flexible retail, commercial and other non-residential floorspace including Community Hub, up to 450 car parking spaces (at least 95% spaces for class C3 use, and up to 5% for class E/F1/F2/Sui Generis uses), car club spaces and associated works to the highway and public realm areas. Due to the size of this application, all plans and documents can be viewed online at www.norwich.gov.uk/angliasquare (full description - Appendix 1)

Representations summary

	Total	Object	Comment	Support
Representations	72	46	11	15
Total received over 4 stages of consultations				

Main issues

1. Principle of development
2. Development Viability
3. Impact of development on European designated sites
4. Principle of housing
5. Proposed retail and other town centre uses
6. Socio-economic considerations
7. Design and heritage
8. Landscaping and openspace
9. Amenity
10. Transport
11. Air quality

Other considerations

Recommendation: Approve, subject to S106 Obligation and the imposition of planning conditions

	Appendices
1	Full description of development
2	Application 18 00330 F - Call in decision letter and PINS report
3	Historic England consultation responses - dated May 2022 and 11 August 2022
4	NCC Economic development manager consultation response
5	Draft GNL0506 - Land at and adjoining Anglia Square
6	Applicant's comparison of the environment effects of the proposal and the Call-in scheme
7	Local Impact Area

The Site and Surroundings

1. The application site measures approximately 4.65 hectares and includes three parcels of land. Most of the application site comprises the existing Anglia Square Shopping Centre and associated adjoining land. This parcel forms an island of land and buildings enclosed by St Crispins Road/flyover, Pitt Street, Edward Street and Magdalen Street. Surrey Chapel and 100 Magdalen Street are both outside of the application boundary. 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, 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 developed 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 a vacant 4 screen cinema (since 2019) and a multi-storey carpark (closed since 2012), 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 more than 2000 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. Premises on Pitt Street are occupied by a few businesses and social enterprises including Men's Shed, Norwich Co-operative Arts, 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). Both are in use for surface car parking.
6. The eastern part of the main site is bounded by Magdalen Street fronted by predominantly two and three storey 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/Desh 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 Crispins Road flyover. Several bus stops are located on Magdalen Street adjacent to the flyover.

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 and 8-22 Edward Street (a pair of four storey residential apartment buildings) to the west, and the three storey Epic Studios building to the east. There are three storey residential properties to the north (2-10 Beckham Place).
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 Road. To the south of the church is a distinctive Grade II Listed terraced timber-framed residential terrace 2-12 Gildencroft Cottages. 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 8 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 several 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. In the last 12 months third parties have made applications to the Secretary of State for Digital, Culture, Media and Sport for the statutory listing of buildings in the SW sector of the site. These include:
 - (i) 45 Pitt Street (currently locally listed)
 - (ii) 53 – 55 Pitt Street
 - (iii) Brick and flint warehouse building to the rear of 47-51 Pitt Street
 - (iv) Former Hollywood cinema

13. In relation to (i), (ii) and (iv) Historic England carried out initial surveys in their role as the Government's statutory adviser on the historic Environment. The Secretary of State considered their resulting advice and recommendations and decided not to take any of these applications forward to full assessment. None of these buildings have been added to the Statutory List.
14. The brick and flint warehouse building (iii) was subject to a full assessment by Historic England. It was concluded that it was built in the late-C18-C19. *'In the rubble walls it clearly incorporates earlier fabric, possibly some reused from the Church of St Olave, but it does not incorporate any standing remains of the church building. The building most closely represents its later use as an industrial building and livery stables but as such it does not have a strong claim to special architectural or historic interest and does not therefore meet the criteria for listing in a national context.'* As a result, this building was not added to the Statutory List.
15. **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.
16. **Landscape and trees:** the site includes two lime trees within the site and a group of London Plane trees fronting onto St Crispin's Road
17. **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

18. 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.
19. In terms of previous planning applications for the site, the most recent was submitted in 2018 (ref. 18/00330/F). The part full/outline application related to a 4.11ha site and proposed 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. Following resolution of Planning Applications Committee to grant permission, this application was called-in by the Secretary of State. The application was subject to a 4-week public local inquiry between 28 January and 28 February 2020. The Planning Inspector recommended that the application be approved. In a decision letter dated 12 November 2020 the Secretary of State (SofS) set out the reasons he disagreed with this recommendation and refused planning permission (Appendix 2 – full decision including Planning Inspector's report).
20. Evidence at the call-in inquiry centred around the following main issues:

- The extent to which the proposed development is consistent with policies for delivering a sufficient supply of homes
- The extent to which the proposed development is consistent with policies for building a strong, competitive economy
- The extent to which the proposed development is consistent with national and local policies for ensuring the vitality of town centres
- The extent to which the proposed development is consistent with policies for conserving and enhancing the historic environment
- Air quality

21. The Secretary of States conclusions on each are summarised below:

22. In relation to new homes:

- While the Secretary of State recognised that the flats would meet the technical standards required and have been carefully designed to overcome as far as possible the disadvantages of single-aspect dwellings (with floor to ceiling glazing, balconies, and access to communal outdoor roof gardens), he considered that the disadvantages cannot entirely be overcome in this way. He considered that the use of single-aspect dwellings in such large quantities to be a significantly sub-optimal design solution, and not outweighed by the advantages relating to access, frontages, and safety (IR441). He therefore found, contrary to the Inspector at IR612, that the proposal would conflict with the requirements in policy DM13 and DM2 for a high standard of amenity for future residents.
- He agreed with the Inspector that the proposal's significant contribution to meeting housing need in Norwich should attract significant weight, and the proposal's significant contribution to meeting the need for affordable housing in Norwich should also attract significant weight (IR544). Regarding Policy DM12, the Secretary of State disagreed with the Inspector at IR611 that the proposal accords with the policy. Policy DM12 sets out principles for all residential development, and criteria b) within that policy states that 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 conditions.

23. In relation to the economy

- The Secretary of State agreed with the Inspector at IR452 that Anglia Square is not fulfilling its potential to contribute to the local economy, having regard to its size, its strategic location, and its designation as part of a Local District Centre (LDC). He noted that, while the proposal would result in some existing employment being displaced, overall, there would be a significant net gain in employment (IR452). He agrees with the Inspector that, insofar as the current condition of the site is a barrier to investment, that barrier would be removed (IR452). He agreed that the proposal would therefore be in accordance with those policies of the Framework which

seek to create a strong, competitive economy, and he attached significant weight to these benefits.

24. In relation to town centres:

- The Secretary of State agreed with the Inspector that the proposal would accord with the policies of the Framework relating to the vitality of town centres (IR462), as well as with policy JCS19 (IR602), and that this benefit should attract significant weight. However, he found conflict with some elements of policy DM18, given the proposal does not protect and enhance the physical, environmental and heritage assets of the city. Given the importance of the heritage assets affected and the location of the site within the NCCCA, he concludes overall that the proposal does not accord with Policy DM18.

25. In relation to conserving and enhancing the historic environment

- The Secretary of State concluded, contrary to the Inspector at IR535, that while the proposal would have elements of both beneficial and harmful effects on the character and appearance of the NCCCA, on balance there would be a neutral impact on the character and appearance of the NCCCA. In addition, there would be minor benefits to the significance of locally listed buildings on Magdalen Street (IR538), and minor benefits to the settings of some individual listed buildings (IR543). As these are all only minor, the Secretary of State considers they attract only limited additional weight in favour of the proposal.
- The Secretary of State concluded that there would be harm at the upper end of less than substantial to the settings of the two listed assets (Church of St Augustine & 2-12 Gildencroft) and minor harm to a larger number (IR537)), but that this would be less than substantial in terms of the Framework in all cases. There would also be a loss of locally listed buildings (43-45 Pitt St), and the proposal would not integrate with the context and grain of its surroundings in some important respect.
- The Framework requires any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) to require clear and convincing justification. It requires that great weight should be given to the asset's conservation; the more important the asset, the greater the weight should be.

26. Air quality: The Secretary of State agreed with the Inspector that the proposal would accord with the Framework and with DM11 (IR610), and that air quality is not a matter that weighs against the grant of planning permission.

27. In terms Planning balance and overall conclusion:

- The Secretary of State recognised that the regeneration of Anglia Square is an important strategic objective, and he is supportive of the benefits in terms of economic development and housing that such a regeneration could bring. However, given the importance of the affected heritage assets and the nature of the design flaws he considered that the application is not in accordance with Policies JCS1 and DM1 in relation to the preservation

and enhancement of heritage assets nor with DM9. Nor is it in accordance with JCS2 and DM3(a)(c) and (f) concerning design, DM12(b) in relation to heritage impacts, DM18 as it relates to DM1, and DM2 and DM13 in relation to residential amenity.

- The proposal would secure the regeneration of a strategic brownfield site, make a significant contribution to meeting housing need in Norwich, make a significant contribution to meeting the need for affordable housing in Norwich, provide a significant net gain in employment, helping to create the conditions in which businesses can invest, expand and adapt, and insofar as the current condition of the site is a barrier to investment, that barrier would be removed, and support the role that Anglia Square plays in the hierarchy of centres, promoting the long term vitality and viability of the LDC. Each of these benefits carry significant weight in favour of the proposal. The proposal has a neutral impact on the character and appearance of the NCCCA. There would be minor benefits to the setting of some listed and non-designated assets, which carry limited weight, as do the air quality benefits identified.
- Although less-than-substantial in all cases, there would be harm to the setting of a number of listed buildings, in two cases towards the upper end of the scale. In accordance with the s.66 duty, the Secretary of State attributes considerable weight to the harm. In addition, there would be harm to the setting of some non-designated assets, and a non-designated building would be demolished and lost entirely.
- The Secretary of State has concluded that the identified 'less than substantial' harm to the significance of the designated heritage assets was not outweighed by the public benefits of the proposal.
- Overall, the Secretary of State concluded that the benefits of the scheme were not sufficient to outbalance the identified 'less than substantial' harm to the significance of the designated heritage assets identified. He considered that the balancing exercise under paragraph 196 of the Framework was therefore not favourable to the proposal.

28. Early planning history - 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.
29. 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.

30. 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.
31. 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).
32. 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

33. The application proposes demolition of all existing buildings on the site and a mixed-use redevelopment scheme including up to: 1100 dwellings; 8000sqm of flexible retail/commercial floorspace, a community hub, 450 parking spaces and new public realm. The full description of development is appended to the report (Appendix 1).
34. It is proposed that the development would be delivered in four phases. Phases 1 and 2 are submitted in full detail, phases 3 and 4 in outline. Masterplan drawings illustrate development proposed across the whole site, including the landscaping of public spaces and streets. The detailed blocks, comprising a total of 353 dwellings, 134 parking spaces and 5906 sqm Net Internal Area (NIA) of non-residential floorspace, are accompanied by a full set of plans showing internal layout and the elevations of each block façade. The outline portion of the site is accompanied by parameter plans. These set 'parameters' for outline blocks in terms of: siting (+/- 1.0m), maximum proposed building height, use (of each proposed storey), access and extent of public realm areas. The detailed design of these outline blocks would be subject to a further reserved matters application.
35. In total 12 blocks/development parcels are proposed. The table below shows the proposed phased delivery of the blocks and summary information of housing numbers.

Phase	Indicated dates of delivery	Blocks	Total no. dwellings	No. affordable dwellings
1	2023 - 2025	A, B, C, D, M	264	46

Phase	Indicated dates of delivery	Blocks	Total no. dwellings	No. affordable dwellings
2	2025 - 2026	K/L J3	89	28
3	2026 - 2028	H, G, J	425*	0
4	2028 - 2031	E/F, F	322*	36*
Proposed maximum totals			1100*	110*

* Indicative maximum figures – actual figures to be determined at reserved matters application stage

36. The proposal has been amended since first submission. A number of amendments have been made in response to comments and feedback made during the first and seconds rounds of consultation. 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.

Summary information

Proposal	Key facts	
Residential		
Total no. of dwellings	Up to 1100	
Affordable dwellings	Minimum of 10% Tenure - Ratio of 85:15 social rent: intermediate tenure	
No. of dwellings meeting Part M4(2) Accessible and Adaptable Dwellings	10% of total	
	Total no. of open market dwellings	No. of affordable dwellings
Detailed		
Block A: 4-7 storeys	142 138 flats + 4 duplexes	0
Block B 2-4 storeys	-	25 11x 2 x bed houses +

Proposal	Key facts	
		14 x 1 bed flats
Block C 3-4 storeys	-	21 21 x 1 bed flats
Block D 2-5 storeys	28 flats 8 x1 bed + 20x 2 bed	-
Block M 3-7 storeys	48 43 flats + 5 duplexes	-
Block K/L 3-6 storeys	53 45 flats + 8 duplexes	28 26 x1 bed flats + 2x 2 bed
Block J3 1-3 storeys	8 flats	
Total dwellings in detailed blocks	279	74
Outline - Indicative figures (based on emerging reserved matters details)		
Block E	148	32
Block F	123	
Block G	146	
Block H	129	
Block J	131	
Indicative total for outline	677	32
Indicative overall total	954 (up to 990)	106 (up to 110)

Proposal	Key facts
Commercial development and other development	
Flexible use	Total – up to 8000sqm NIA (8889sqm GIA) flexible retail, commercial and other non-residential floorspace (retail, business, services, food and drink premises, offices, workshops, non-residential institutions, community hub, local community uses, and other floorspace
Community Hub (including community hall)	Located in Block D – ground floor and part of first floor – 697 sqm (NIA)
Public toilet and changing places facility	Located in Block A
Car club car park	Located on Edward Street – up to 5 spaces
Appearance	
Principal materials	Brick (red, grey and white of varying tones), metal work and tile
Energy and resource efficiency measures	The development will meet or exceed Building Regulations 2021 (as amended by 2022 & 2023 changes) In relation to JCS 3, 56% of the development's energy needs will be met using air source heat pumps.
Operation	
Ancillary plant and equipment	Internal plant rooms Roof top plant
Transport matters	
Access	<ul style="list-style-type: none"> Modification of existing St Crispins Road access to provide access and egress Creation of car park accesses on Edward Street and Pitt Street Creation of internal routes within the site: Principal routes: N-S - referred to as 'St Georges Street' E-W – referred to as 'Botolph Street' Secondary routes: E-W – referred to as 'Cherry Lane' Other shorter connecting routes

Proposal	Key facts
	<ul style="list-style-type: none"> • Vehicular access to the site would be strictly controlled. The routes are designed to be car free. Emergency access and essential servicing would be permitted. • Cherry Lane would act as a public through route to Magdalen Street. It would also act as a service route and provide residents access to undercroft car parking and a limited number of on street parking spaces. • St Georges Street and Cherry Lane would include cycling routes. St Georges Street would include a segregated cycling facility connecting into the yellow pedalway network.
No of car parking spaces	<p>Up to 450 spaces – min of 95% for residents, max 5% for non- residential use</p> <ul style="list-style-type: none"> • Detailed in full: Block A – 123 covered spaces within undercroft (basement and ground floor) and Block C – 11 spaces. • Outline: Undercroft parking within blocks E, G and J <p>The residential car parking provision includes 100% active electric vehicle charging point provision and 6% disabled parking bay provision.</p> <p>Limited on street parking is proposed, accessed via Cherry Lane</p> <p>Up to 5 (min of 3) car parking spaces for car club</p> <p>Public parking: service layby along Edward Street will permit 20min parking bay outside refuse collection times</p>
No of cycle parking spaces	<p>Detailed in full:</p> <ul style="list-style-type: none"> • Residential – 555 spaces in 10 secure stores • Commercial – 63 spaces in 2 secure stores in Block A and J3 <p>Outline:</p> <ul style="list-style-type: none"> • Cycle parking for residential and commercial at the same ratio <p>Whole site</p> <ul style="list-style-type: none"> • Public - 110 spaces distributed across the site

Proposal	Key facts
Refuse arrangements	<p>Commercial – Designated covered service yard in block M, potential secondary yard in Outline Block J.</p> <p>Residential refuse - Communal bins stores are integrated into each block. Service bays are proposed on Pitt Street and Edward Street for use by refuse vehicles. In addition, Cherry Lane would act as service route.</p> <p>Residential deliveries – All parcel deliveries would be made to the community hub (Block D)</p>

Design approach

37. The Design and Access Statement (DAS) sets out the design process describing the site and contextual analysis and the evolution of the proposed scheme.
38. The DAS identifies a range of guiding design principles. These include:
 - Re-establishing primary historic routes reconnecting the site to the surrounding area and community
 - Creation of public spaces at key functions
 - Introducing a finer urban grain to the site
 - Creation of continuous street frontages
 - Creation of amenity spaces at street, podium and roof levels
 - Creation of gateway buildings
 - Respond to the character of Norwich – particularly in terms of street patterns, industrial architecture, yards, terraces broken up with distinctive part walls; rich architectural detailing and celebrating Norwich landmarks.
 - Building height, no taller than Sovereign House (34.1m)
39. The resulting masterplan is one that consists of 12 blocks of development, 2 of which are located on the 'satellite' sites to the north of the main site. The remaining 10 blocks are arranged across the site separated by 2 primary and 7 secondary routes.
40. The proposed 12 blocks vary in height between 2-8 storeys. The height of each of the detailed blocks is fixed and detailed in full on elevational drawing and cross-sections. Height of the blocks within the outline element of the application are shown as maximum storeys on the Building Height Parameter Plan.
41. The DAS describes the massing strategy in which predominantly north-south orientated buildings are taller and the predominantly east-west buildings lower. This strategy is proposed to optimise daylight and sunlight into the spaces and

routes. The Planning Statement describes further how the massing strategy has been influenced by a number of factors including: potential impact of heritage assets; sustainability objectives; local constraints; daylight/sunlight requirements and the marginal viability of the site.

42. Blocks A, M and K/L are 'perimeter block' aggregations, each constructed around an elevated internal (open) podium garden for residents. The podiums sit above, in the case of block A covered residential parking spaces, block M a service bay and block KL commercial floorspace. Similar podiums are shown for outline blocks E, E/F, G and J, above 2 levels of covered residential parking spaces.
43. The majority of the proposed flexible commercial space is located at ground floor level. The exception is block K/L which includes some mezzanine commercial floorspace and a four storey element ('Stump Cross') which is entirely commercial. Furthermore, outline block F, includes some mezzanine floorspace. The majority of ground floor commercial floorspace is shown located on: the Magdalen Street frontages of blocks KL and J3, blocks fronting the new Anglia Square and the E-W route through the site referred to as 'Botolph Street'. In addition, the northern elevation of block KL includes a partial commercial frontage on to Annes Walk Lane, two commercial units are shown fronting Edward Street and the outline parameter plans show 3 commercial units fronting Pitt Street. The ground floor (and part first floor) of Block D is proposed for community use.
44. The detailed element of the application includes landscape proposals. Public realm proposals include (but are not confined to): a reconfigured Anglia Square, a public garden (St Georges gardens) and the primary N-S and E-W routes running through the site. Details of private gardens, communal residents' gardens and green roofs are included for the detailed blocks. A landscape masterplan and strategy documents describe the strategy for the whole site and also includes matters such as play, lighting and sustainable urban drainage (SUD) features.

Representations

45. Advertised on site and in the press. Adjacent and neighbouring properties have been notified in writing. A total of 72 representations have been received citing the issues as summarised in the table below. Representations made via the Council's website are available to view 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.
46. It should be noted that compared to the previous application there has been significantly less representation. In relation to application 18/00330/F a total of 520 contributors submitted representations (436 objecting, 19 commenting, 63 supporting) and two petitions were received.

Issues raised	Response
Sovereign House (including iconic staircase) and the cinema have architectural value and character and	Sovereign House and the cinema are identified as negative buildings in the city centre conservation area

Issues raised	Response
are part of the history of the site and the city – consideration should be given to retention.	appraisal that harm the character and appearance of the conservation area. During the development of the current proposals for Anglia Square Historic England considered whether the buildings qualified for listed and concluded they did not
Historic buildings on Pitt Street including the church of St Olaves should be retained and integrated into the scheme.	Main issue 7
Insufficient consideration of demolition and the embodied carbon. Waste of resource, existing buildings should be repurposed. The proposed building will never repay the carbon debt caused by its creation	Retaining and reusing the existing buildings on the site would prevent a new development layout being created with greater permeability for pedestrian movement. The developer also concluded that the cost of retaining, upgrading and converting the buildings to residential use was not viable. There are currently no planning policies that would allow embodied energy to be considered when determining whether planning permission should be granted.
Existing tenants will be displaced.	Main issue 5 and 6
Poor consultation with existing tenants.	
Loss of Outpost (artist studio space) which provides an affordable resource for creative community.	Main issue 6
Loss of public parking.	Main issue 10
<p>Proposed buildings are out of scale not just to the immediate locality but to the city as a whole.</p> <p>Too dense, overbearing, overdevelopment</p> <p>The blocks will utterly dominate the 2 to 3 storey buildings/historic streets that surround the site.</p>	Main issue 7

Issues raised	Response
<p>The architects claim they want to recreate Norwich's yards and alleys but doing this with 6 to 8 storey blocks is absurd and nonsensical.</p> <p>Norwich is an individual city; this design makes it like anywhere else. It is not a human scale.</p>	
<p>Little regard to historic character of Norwich</p> <p>Development will loom over St Augustines Church, St Augustines Street and Magdalen Street</p> <p>Visible from St James Hill and Waterloo Park</p> <p>Historic street pattern is not being reinstated.</p> <p>Church of St Olaves should not be demolished.</p>	Main issue 7
<p>Architecture is bland and generic. This design does not respect the character of Norwich.</p> <p>Soulless</p>	Main issue 7
<p>Shop fronts – need to be more varied</p>	Main issue 7
<p>Magdalen Street is the best street in Norwich; Anglia Square is one of the most characterful areas in the city.</p> <p>There is a positive emotional feeling of being in and around Anglia Square now.</p> <p>This proposal to erase Anglia Square and replace it with 6-8 storey blocks of expensive flats is not something that is being done in the interest of the existing community.</p> <p>The existing character of the area should be preserved not lost – diverse and eclectic mix of people and shops, the range of different ethnic restaurants and cafes and the artistic elements.</p>	Main issue 7 and 8
<p>Independent retailers should be protected offer vital community support – need to retain access to affordable shopping.</p> <p>Should be a commitment to keeping not just the one low end retailer (Poundland?) but also QD and Savers and Iceland</p>	Main issue 5

Issues raised	Response
<p>Shops need to continue to serve the needs of the old, young families and those with limited mobility.</p> <p>Provisions should be put in place provisions in place to protect the businesses currently occupying Anglia Square.</p>	
Concern about waiving of infrastructure payment	A decision on CIL ECR can only be made following the grant of planning permission, is subject to an application process and determination by Planning applications committee
Impact of construction on traffic movement within the city and on pollution	Main issue 10 and 11
Number of dwellings exceeds the 800 referred to in GNLP policy	Main issue 1 and 2
Number of dwellings exceed the 600 referred to by Historic England	Main issue 2
Too residential led – should be more mixed in use.	Main issue 5
<p>10% affordable housing insufficient given level of housing need</p> <p>Need for good quality social housing.</p> <p>Amount of public subsidy should require higher levels of affordable housing</p>	Main issue 2 and 4
The interior standards of the dwellings are inadequate other than for short-term occupation.	Main issue 9
<p>New homes have insufficient gardens. Proposed standard of the residential environment is seriously deficient.</p> <p>External space – essential to mental health</p>	Main issue 9
Impact of air quality.	Main issue 11
<p>Lack of public greenspace provision.</p> <p>Needs to be more public parks in the area, otherwise there will be too great a strain on Gildencroft Park.</p>	Main issue 8

Issues raised	Response
<p>The proposed community 'hub' will not replace the established and vibrant communities who already use Anglia Square daily. Nor replacement for a cinema and a vibrant cultural scene.</p>	<p>Main issues 5 and 6</p>
<p>The value of the proposed dwellings is significantly above average values in that area. This development will profoundly change the character of the area by pushing up property prices and rents and pricing local residents out.</p> <p>Gentrification</p>	<p>Main issue 6</p>
<p>There is no real space for nature in the plans.</p> <p>The proposed courtyard gardens are a cosmetic veneer of greenery on the roof of covered car parking.</p> <p>The scheme does not offer sufficient biodiversity value.</p> <p>Ecology benefits have been overstated.</p> <p>Development should be greener and have more trees.</p>	<p>Main issue 8</p>
<p>The buildings are tall and close together, which means the streets will be dark.</p> <p>The public space in Anglia Square at the moment gets a lot of light and is beautiful place to sit on a sunny day. Some of the streets will get a lot of light and others will get very little</p>	<p>Main issue 8</p>
<p>Missed opportunity to increase Norwich's cultural offering by refurbishing buildings it to include concert hall facilities.</p> <p>The site also provides one the largest artist studio complexes in the country. These are the people who have helped to regenerate the cultural and retail offerings of the area.</p>	
<p>Increase in residents will place a massive strain on the already inadequate public transport offering.</p>	<p>Main issue 10</p>
<p>The proposed flats are far too close to the back of the Leonard Street properties and would block out what little sun they currently get.</p>	<p>Main issue 9</p>

Issues raised	Response
CCTV needed to manage anti-social behaviour	Condition 43 is proposed in relation to crime prevention and includes CCTV
Mix of housing provision is wrong with too many small units and not enough family-sized dwellings. Too many flats. Communal facilities are expensive to provide and costly to manage. Likely to create social and community problems in the future.	Main issue 4
Concern about GP access	Main issue 6
Traffic disruption and pollution during the long construction period	Main issue 10 and Noise section
Comments in support	
Existing buildings are an eyesore and need to go	
Development needs to go ahead – waited for too long	
How much longer are local residents going to have to put up with the current abandoned and rotting buildings dominating Norwich over the Water	
Scheme supports sustainable travel	
The revised plans mean that no building will be over eight storeys in height and the development will fit in to its surroundings and not overly dominate the nearby historic St Augustine's Church.	
The building sizes, designs and layout are an improvement from the previous plans.	
Developers have been in contact and are keen to support provision within the new development (Men's Shed)	

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 (AW)

48. No objection subject to imposition of condition. Confirm that there are AW assets within and close to the site. In relation to wastewater treatment, they indicate the

foul drainage from this development is in the catchment of Whitlingham Trowse Water Recycling Centre that will have available capacity for these flows. Conditions are recommended regarding on-site drainage and surface water disposal.

Broads Authority

49. Does not have any comments to make regarding this application.

Cadent Gas

50. No objection, informative note required.

Churches Conservation Trust

51. Object to the scheme as proposed.
52. We note the amendments made to the scheme; however, height, scale and character of the proposed development would still be detrimental to the setting of the church in the surrounding historic townscape and would have a significant and negative impact on the many valued views of the city.

Church of St Augustines

53. Remain deeply concerned about this development site.
54. Visual impacts as viewed from our church – do not agree with statements made in Heritage and Townscape Baseline Impact Assessment. Do not in our view represent the effect of the proposed buildings in terms of their height, darkness and proximity all of which would significantly impact the setting of the church and its immediate surrounds in an overpowering way.
55. In terms of green space concerned about the needs of such a densely populated new housing and impact on the safety and well-being of our existing parish residents. We question whether the housing mix genuinely reflects the needs of the area and concerned about the level of affordable provision.
56. Keen that design and purposes of the community hub complement rather than compete with church hall. Would be most interested in capital funds from the development that would allow investment in church hall and adjacent green space. Further investigation is required of the historical church site of St Olafs. Concern over construction process and prolonged periods of noise, dust, and disruption. Welcome opportunity to discuss how these can be mitigated to avoid sensitive times of worship and public use of our site.

Council for British Archaeology (CBA)

57. Response to first consultation. The CBA believe these proposals to be a considerable improvement on the previous scheme, although we recommend revisions are necessary regarding the proposed demolition of some 19th century and earlier structures. The CBA object to the demolition of 43-45 Pitt Street and the flint warehouse on both heritage and environmental grounds.

58. The CBA are aware that recent assessment of the flint and brick warehouse structure has suggested it may contain the built remains of the lost St Olave's medieval parish church. The CBA support and echo the stance taken by Save Britain's Heritage regarding the retention and conservation of this structure.
59. If your LPA do permit the demolition of these buildings at the corner of Pitt Street, the CBA are concerned that these structures are included in phase 1, no demolition of this corner of the site should be permitted until the redevelopment phase is due to happen and secured by full planning permission. This area of the site only has outline planning proposed at present.
60. The CBA recommend that development in this location should be viewed as an opportunity for substantial public benefits, as required by paragraph 201 of the NPPF as mitigation for the inevitable harm to buried archaeology, in the form of genuine public participation with that archaeology. The CBA believe that an expectation of public engagement should be included within the archaeological conditions for any planning permissions for the proposed development, as well as post excavation analysis and dissemination.
61. The CBA recommend the retention of 43-45 Pitt Street and the brick and flint warehouse building, believed to contain remnants of the lost medieval church of St Olaves are retained. Meeting the requirements of the Joint Core Strategy (amended 2014), policy 11 would be best achieved through adaptively reusing these structures. Non-designated heritage assets present fantastic opportunities for contemporary architecture and design to reimagine buildings as part of a place's evolution.

Environment Agency

62. Initially lodged a holding objection to the application on the grounds of foul water disposal. Latest response confirms that holding objection has been removed. The response includes the following:
63. Foul water disposal: The data which we currently have access to for Whitlingham Water Recycling Centre (WRC), which serves the catchment for this development, shows that the WRC is operating at approximately 99.9% capacity, and has very little headroom for accommodating additional growth connections. Through proactive discussions with Anglian Water, we were provided with information and assurances that there had been an anomaly in the 2021 data due to an erroneous flow meter. We agreed with AWS that we would currently take into consideration an assessment for Whitlingham WRC that is based on 2020 Q90 data as an interim position for calculating headroom capacity. We are satisfied that we can provide an updated position that now removes our holding objection, providing you are satisfied with the risks of using backdated data as an interim position.
64. Water Resources: We have evidence which indicates that groundwater abstraction to meet current needs of the population is already in some cases causing ecological damage to Water Framework Directive designated waterbodies (including chalk streams where applicable) or there is a risk of causing deterioration in the ecology if groundwater abstraction increases. This development has the potential to increase abstraction from groundwater sources. You should consider whether the water resource needs of the proposed development alone, and in-combination with other proposed development that the

relevant water company is being asked to supply, can be supplied sustainably without adverse impact to WFD waterbodies and chalk streams. You must have regard to River Basin Management Plans and be satisfied that adequate water supply exists to serve development, in accordance with the policies of your Local Plan. Any surplus in water companies' current WRMP is subject to further consideration of whether it can be taken without causing environmental deterioration. Residential - Should the development be permitted, we would expect you to ensure that the new buildings meet the highest levels of water efficiency standards, as per the policies in the adopted local plan.

The Gardens Trust and The Norfolk Gardens Trust

- 65. Object to the proposed development because of its effect on views from Waterloo Park and St James Hill/Kett's Heights
- 66. Waterloo Park - the height and bulk of the 8 storey blocks is considered to result in moderate harm to views
- 67. St James Hill/Kett's Heights - the height and bulk of the proposed 8 storey blocks is a concern. The development would result in significant harm to these important views rather than, as the applicant asserts, providing a development sitting comfortably in the visual background.

Historic Buildings and Places

- 68. We have objected to previous iterations of this redevelopment scheme and continue to object to the latest revision.
- 69. No substantive changes have been made to the scale, design and massing of this development and the latest revision has again failed to address the heritage concerns that have been raised on numerous occasions by Historic England and the other statutory and heritage consultees, and during the public inquiry in 2020.
- 70. Anglia Square forms a key part of the northern end of the Norwich City Centre Conservation Area (NCCCA) and HB&P recognises the huge opportunity to sensitively regenerate this site to 'enhance or better reveal' the significance of the NCCCA (Para. 206, NPPF, 2021) for the benefit of the wider city centre. The surrounding historic environment is largely 2-3 storeys in height and of a much more fine-grained building pattern and this should be reflected and respected in this scheme.
- 71. It is a great concern that the key justification for the excessive height and scale of the proposed development are those buildings that were constructed on the site the 1960s that are deemed to be 'negative' and detracting in the NCCCA Appraisal. This is a fundamental flaw with this application and results in a dense collection of large, taller buildings across the whole site that completely change the character of the wider area and dominates this part of the NCCCA. It is particularly detrimental to the historic Magdalen Street streetscape and harms the setting and significance of several nearby listed heritage assets.
- 72. In summary, HB&P consider that the application and the revised proposals do not have sufficient regard to the significance, character and appearance of the Norwich City Centre Conservation Area or to the setting of the heritage assets in the surrounding area.

Historic England

73. Submitted and amended schemes - Object. Response to first and second consultations attached in full (Appendix 3)
74. First consultation (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 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 southeast 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.

75. Second consultation - *The revisions, while resulting in modest improvements to aspects of the scheme, do not address Historic England's objections to the scheme.*
76. Third consultation - *The proposed changes to the buildings' design largely relate to internal layouts, with minor external amendments to window, door and balcony positions. Other changes relate to the public realm landscaping. The additional CGI 7 of block D is helpful to illustrate the proposal but there are no significant changes to the overall design. Historic England therefore maintains its objection.*
77. Final response following publication of development viability evidence - *The fundamental viability question was the one we asked in our first letter, neither review has answered this. This was that a review of viability 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. The independent review seems to suggest that viability of the proposed scheme is uncertain.*

Health and Safety Executive (HSE)

78. Following feedback and amendment the HSE have confirmed that they are 'content' about this application.

Norfolk County Council – Lead Local Flood Authority

79. No objection subject to recommended conditions being attached to any consent if this application is approved and the Applicant is in agreement with pre-commencement conditions. Conditions relate to the following matters:
 - Water and water reuse facilities.
 - evidence in relation to discrete drainage areas
 - evidence of the achievement of permanent surface runoff rate; details of temporary treatment units
 - flood defence structures at the entrance to the Basement Car Park and the Edwards Street Service Yard
 - Blocks A and D, the applicant shall provide appropriate flood resistance measures for each of the affected properties.
80. Furthermore, a condition is recommended in relation to off-site flooding. The condition requires the applicant to develop and install appropriate highway drainage improvements in accordance with the Highway Authority, Anglian Water and the LLFA guidance along the neighbouring streets. This work is to ensure there is no increase in surface water flood risk within the highway due to the proposed development and the properties along the impacted road are not negatively affected. In addition, to the improvements scheme the applicant is required to undertake a threshold level and topographic survey of properties along

the impacted to better inform the impact assessment and in identifying any residual risk due to the development. Should any properties remain negatively affected by an increase in flood risk, the developer should offer to install suitable flood resistance measures to the properties affected by residual flood risk.

Natural England

81. No objection - subject to appropriate mitigation being secured.
82. Natural England considers that without appropriate mitigation the application would have an adverse effect on the integrity of:
 - The Broads Special Area of Conservation (SAC)
 - Broadland Special Protection Area (SPA)
 - Broadland Ramsar
 - Breydon Water SPA
 - Winterton-Horsey Dunes SAC
 - Great Yarmouth and North Denes SPA
 - North Norfolk Coast SAC
 - North Norfolk Coast SPA
 - North Norfolk Coast Ramsar
 - The Wash and North Norfolk Coast SAC
 - The Wash SPA
 - The Wash Ramsar
 - Norfolk Valley Fens SAC
83. And would damage or destroy the interest features for which the underlying Sites of Special Scientific Interest of the above European sites have been notified.
84. In order to mitigate these adverse effects and make the development acceptable, the following mitigation measures should be secured:

On-site greenspace as shown in drawings ANG-PLA-XX-XX-DR-L-0001 Revision P05 (01.04.2022) and ANG-PLA-XX-XX-DR-L-002 Revision P05 (01.04.2022)

 - *Ongoing management and monitoring of the on-site greenspaces*
 - *A financial contribution of £20,800 to improve access to and enhance the natural greenspace at Gildencroft Park and Wensum Park*
 - *A financial contribution of £204, 523 towards Norfolk GIRAMS*

- *Information provided to residents advising them of on-site and nearby recreation opportunities*
- *A financial contribution to secure the necessary credits for nutrient mitigation through the Norwich City Council mitigation scheme*

85. Natural England advises that an appropriate planning condition or obligation is attached to any planning permission to secure these measures.

Norfolk and Waveney Integrated Care System (ICS)

86. Seek contribution towards the costs of mitigating the impact of the development.
87. *This detailed proposal comprises a development of 353 residential dwellings, with a population growth of circa. 380 additional residents, in terms of net gain in population (allowing for movement in and out of the area), which will have an impact on the NHS funding programme for the delivery of healthcare provision within this area and specifically within the health catchment of the development. The ICS would expect these impacts to be assessed and mitigated. It is noted that this proposed development is part of a larger planned re-development of Anglia Square with a potential total of 1100 dwellings. This will have a significant impact on a number of healthcare services in the area of which some are already constrained.*

The proposed development will have an impact on the services of local GP practices, Acute healthcare, Mental healthcare, Community healthcare and the Ambulance service operating within the vicinity of the application site. The proposed developments would have an impact on healthcare provision in the area and its implications, if unmitigated, may be unsustainable. In order to be considered under the presumption 'in favour of sustainable development' advocated in the National Planning Policy Framework, the proposed developments should provide appropriate levels of mitigation.

This development would give rise to a need for improvements to capacity, which, in line with the ICS strategic estates strategy, would primarily come from Improvements/extension of existing infrastructure or the building of a new facility. It will also give rise to increased investment requirements within our acute, community and mental healthcare settings, where the investment will be required to provide and develop functionally suitable facilities for patients, providing the required beds and floorspace to manage the increased demand.

Estimated capital cost calculations of additional healthcare services arising from this proposed development (353 dwellings), as modelled through the nationally recognised and agreed (via the Planning in Health Protocol) HUDU tool, which in this case would be £424,082.

The ICS Estates Workstream and partner organisations do not have funding to support development growth; therefore, it is essential to effectively mitigate development impact and maintain sustainable healthcare services for the local communities of Norwich that developer contributions are secured.

Assuming the above concerns and requests are considered in conjunction with the current application process, the ICS Strategic Estates workstream would not wish

to raise an objection to the proposed development, however without any mitigation the development would not be sustainable.

Norfolk County Council – Local Highways Authority

88. No objection subject to conditions.
89. The application offers improvements to the surrounding highway, benefiting both the residents of the development and the wider community and promotes the use of active and sustainable travel. The highway authority considers that all the off-site works should be secured by condition. The works will then be delivered by a
90. Section 278 Agreement. If necessary, the Travel Plan will be the highway authority's only requirement for any S106 Agreement.
91. We have reviewed the revised layout plans as well as the Transport Assessment Addendum which includes a Stage 1 Road Safety Audit (RSA) commissioned by the applicant for the proposed off-site highway works. The RSA flags a number of issues that will need to be addressed prior to the detailed design stage of all off site highway works ready for technical vetting from the Highway Authority's internal highway design team.
92. It is also worth noting that the applicant proposes to plant a number of trees around the development on the highway within proposed visibility splays and adjacent to loading bays. The Highway Authority strongly objects to these trees on the basis that they will restrict intervisibility between road users and will pose a significant risk to highway safety. Notwithstanding the above, the Highway Authority accepts the principle of all the proposed off site highway works based on the indicative layouts that have been provided and understands that changes in detail will be required as part of the Section 278 detailed design checking.

Norfolk County Council - Planning Obligations Team

93. **Education** - It is predicted that the development will generate demand for additional school places: early education age: 82, infant primary school: 108, junior school 128, high school age: 122, sixth form age: 13. Taking into account the other developments in this area of Norwich would generate a total additional demand for spaces for 87 Early Education age children, 251 primary age, 130 high school age and 14 sixth form age. At the time of writing there is a decline in both birth rate and pupil rolls influencing the current spare capacity at Early Education, Primary, and Secondary sectors. It is anticipated that there will be a reversal of this decline in the foreseeable future so the County Council will monitor pupil numbers. If further expansion is required for the schools in the area a funding claim for additional places through CIL will be submitted as this is covered on the District Council's Regulation 123 list.
94. **Library:** New development will impact on the library service and mitigation is required to increase the capacity of the library service in Norwich.
95. **Fire Hydrant:** provision will be required for the development - Prior to the first occupation of the buildings a scheme should be submitted to and agreed by the Council in consultation with Norfolk Fire Service, and no dwelling shall be occupied until the hydrant serving the group of properties has been provided to the satisfaction of the Council in consultation with Norfolk Fire Service.

Norfolk County Council - Public Health

96. Public Health welcomes the submission of a separate Health Impact Assessment (HIA) submitted as part of the application and is limiting its comments to the HIA report.
97. The assessment methodology for the HIA is appropriate and is based on best practice. Public Health agree that there are unlikely to be any significant, long term adverse health impacts from the development compared to baseline conditions. It should however be noted that the area within which the development is located (Lower Super Output Area Norwich 007E) is one of the 10% most deprived neighbourhoods in the country, with people in the local impact areas experiencing poorer health outcomes than Norwich as a whole, particularly in terms of mental health.
98. The construction phase impacts are assessed as having medium term, adverse impact 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. The associated risk to health, particularly for priority/vulnerable groups will be minimised through the implementation of Construction Environmental Management Plan via a planning condition. Given the assessment states that opportunities for the community to participate in the planning of services has the potential to impact positively on mental health and wellbeing and can lead to greater community cohesion, the CEMP should commit to including community participation, especially given the long construction timescales envisaged. Equally a similar approach should be applied to the design of open and communal spaces during the construction phase.
99. Lastly the HIA was unclear about future healthcare provision for new residents. It states that there is existing capacity in primary care in the area, but it was unclear if this capacity will meet the needs of the anticipated population in the area once construction is complete. It also says that there will be commercial space that could be used for provision of healthcare facilities but again it is unclear if this will happen. Further work should be done with the NHS to ensure planning to meet primary healthcare needs as this is a sizeable development.

Norfolk Fire and Rescue

100. No objection providing the proposal meets the necessary requirements of the current Building Regulations 2010 – Approved Document B (volume 2 – 2019 edition) as administered by the Building Control Authority. Recommend planning conditions in relation to provision of fire hydrants.

Norfolk Historic Building Trust

101. Objection:
102. **1. Substantial heritage harm:** The overwhelming **scale** and **bulk** of the proposed blocks are harmful to the existing character of the City Centre Conservation Area which is predominantly characterised by two- and three-storey buildings. The 14

large urban blocks proposed would overwhelm the medieval city centre and the historic grain of low-scale streets and terraces which surround Anglia Square. Important historic buildings nearby whose **settings** would be particularly badly affected are the Grade I listed St. Augustine's Church, the Grade II Gildencroft Almshouses, as well as listed buildings on St. Augustine's Street, Magdalen Street and Doughty's Hospital in Golden Dog Lane. Weston Homes also propose demolishing a row of locally-listed buildings in Pitt Street which are the sole survivors of the area's history before redevelopment in the 1960s, including the remains of St. Olave's Church, a relic of Norwich's Anglo-Scandinavian history, the original Church having been dedicated to the Norwegian King St. Olaf in the early C11th.

103. **2. Housing type and density:** The proposal for 1,100 one- and two-bedroom flats is excessive and does not fulfil the need for larger family units in this part of the City. In addition, the single aspect design of at least half these units, with windows on only one side, will provide poor quality day-round even access to light and air, with those backing onto parking facilities probably experiencing additional noise and air pollution. It is the Trust's assertion that Norwich is already over-subscribed with one- and two-bedroom flats and that larger, more family-oriented accommodation with good access to safe outside space is what is sorely needed and will substantially contribute to a more cohesive, lively, community-focused development which is what the area used to be before the 1960s development of Anglia Square ripped the heart out of it. To this end, like other commentators, we commend the **Ash Sakula Architects Vision**, commissioned by SAVE Britain's Heritage, for Anglia Square, to provide a more forward-thinking, sustainable, lower-impact, community-based development, more in keeping with its historic surroundings and geared towards providing a good quality of life for residents, businesses and visitors.
104. **3. Public subsidy and viability arguments:** It is deeply disappointing that, despite being set to receive £15m of government subsidy from Homes England, Weston Homes has also been granted exemption from paying £1.3m of Community Infrastructure Levy to Norwich City Council.
105. **4. Sympathetic Redevelopment:** Everyone agrees that Anglia Square desperately needs regeneration but, along with other commentators, such as Historic England, SAVE Britain's Heritage, The Norwich Society and many other local societies, businesses, professionals and individuals, the Trust is deeply concerned that there is a real danger of repeating the costly mistakes of the 1960s and developing Anglia Square in a way that will not be fit for purpose. We all know that good design hugely affects our well-being and our behaviour for the better and that poor design does the opposite. There is a real opportunity here for a sympathetic, sustainable, conservation-led development which can be held up as a great example of city centre regeneration which meets the needs of residents and businesses. We again commend The Ash Sakula plans as an example of what can be achieved and would ask the Council and Weston Homes to revise their plans along those lines, for the benefit of all. There is a golden opportunity here to provide something really exemplary for the City to be proud of well into the future, and notwithstanding the current position, we urge you to grasp it.

Norfolk County Council - Historic Environment Service

106. The proposed development site has a high potential to contain heritage assets with archaeological interest (buried archaeological remains) of at least of local and regional significance. These include (though not exclusively) 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.
107. The site has been subject to development which to varying degrees had an archaeological impact. An overall deposit model, or heat map detailing the depth and nature of impacts from previous construction will be required.
108. There will be the need for a large amount of archaeological work, but we are content that this can be dealt with through a post-consent programme of archaeological works.
109. A planning condition is recommended, the wording can be tailored to reflect the phased nature of the development and allow demolition of existing structures to existing ground level/floor slab level without the need for an approved archaeological Written Scheme of Investigation and associated discharge of condition application being in place.

Norfolk Police (architectural liaison)

110. Recommend the applicant fully embraces principles of Crime Prevention through Environmental Design (CPTED) and that security measures recommended by Secured by Design (SBD) guidance Homes 2019 and Commercial Developments 2015. Detailed comments made in relation to the scheme particularly regarding secure access to car parks, cycle stores and ensuring that residential frontages do not become vulnerable to crime.

Norwich Airport

111. Object unless conditions are attached relating to landscaping proposal ensuring hazardous species of birds are not attracted to the site (birdstrike risk) and cranes (during construction)

Norwich Cathedral

112. (From the Dean and Chapter of Norwich Cathedral):
113. Are grateful for the seriousness with which Weston Homes have engaged with the community in preparation for offering this application. The plans are on a more human scale appropriate to Norwich and with a greater respect for the historic shape and fabric of the neighbourhood. In an ideal world, the scale and height of the buildings would be reduced yet further, but we recognise the commercial pressures faced by the developers.
114. However, we do wish to object to the proposed demolition of the remains of the historic church of St Olave, a significant witness to the flourishing Scandinavian community and culture that preceded the Norman conquest. The remains should be protected, preserved, and interpreted for the benefit of the community. This is by no means incompatible with the continuation of the commercial development.

Norwich City Council - Design and conservation

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

Norwich City Council - Ecology

116. The revised scheme has increased the level of vegetated areas from the previous versions under this application and the value that the proposed development would contribute to the ecological value of the site. The site is largely urban in character with the dominant feature the built environment, and this would remain the case following development.
117. The scheme has taken advantage of the many flat roofs present in the design by proposing a variety of green roofs, to include sedum roofs, wildflower roofs, and podium gardens which would include a variety of planting such as herbaceous plants, shrubs, and small trees. The wider variety of the green roofs is supported; however, the sedum roofs and wildflower blankets remain as the lowest scoring type of green roof in the BNG metric, and therefore providing the lowest ecological value for a green roof; it is a shame that their value has not been increased still further.
118. The revisions have also increased the level of ornamental hedges. The number of hedges proposed makes the species selection important. They should consist of a mixture of species and ones that provide ecological benefits such as food as well as shelter. Ideally the mix should include some if not all native species.
119. As discussed above the proposed scheme would significantly improve the ecological value of the site, however it must be noted that the ecological value is currently relatively poor even for an urban area. The revisions have resulted in a scheme which would provide for a variety of habitats, and although the scheme could be more ambitious in terms of the ecological value that it would provide, it would result in a significant BNG and with appropriate conditions would provide a variety of habitats which should serve to support and increase the wildlife in the area.

Norwich City Council - Economic Development

120. Support the application - appended to the report (Appendix 4)

Norwich City Council - Environmental protection

Noise:

121. No Objection subject to the imposition of conditions
122. 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. The concerns raised in the MCAL review have been addressed by Stanstead Environmental who have noted and agreed with the issues raised. Should the application be approved, the matters will be further addressed through the planning conditions.

123. It is expected that appropriate daytime and night time internal noise levels are to be demonstrated to be achieved such that future residents are not impacted by excessive levels of road traffic noise.

Air quality:

124. No objection subject to the imposition of conditions.
125. Having reviewed the data, it is apparent that air quality will not be adversely affected by the development and the conclusion is the same as the Planning Inspector's for the previous application, "that air quality is not a matter that weighs against the grant of planning permission". This conclusion is considered appropriate for this revised scheme and therefore mitigation is not required.
126. Dusk Risk Assessment: Aether Ltd on behalf of Weston Homes has undertaken a demolition and construction dust risk assessment. As stated in the introduction to the assessment "emissions and dust from the construction phase of a development can have a significant impact on local air quality". The Institute of Air Quality Management's (IAQM) Guidance on the Assessment of Dust from Demolition and Construction has been employed and its methodology has been employed within the document. The recommendation from the dust risk assessment is that a dust management plan is produced. This should be required through the imposition of a condition. This plan is required to be extensive, targeted and robust. It should cover all the appropriate areas identified in the IAQM Guidance together with related nuisance issues. It is further recommended the condition should also include matters related to asbestos dust/fibres and odorous dusts and effluvia from the site.

Contamination:

127. No objection – subject to the imposition of condition
128. Since first submission the applicant has submitted an updated Preliminary Risk Assessment report with an updated Envirocheck data report and walkover survey. The PRA sufficiently characterises the site. The report makes recommendations for an intrusive investigation. It is recommended that planning conditions are imposed to secure the details and implementation of further investigation, where necessary the agreement of a remediation strategy, implementation and verification.

Norwich City Council – City Services

129. The applicant has submitted a Refuse Strategy. This shows the location and size of bins stores within the detailed blocks and sets out on site management arrangements. In general, with the exception of blocks B, C and D (smaller blocks), the strategy relies on a weekly collection. This reduces the size of bin stores and potential odour associated with high refuse volumes. The additional refuse collection would need to be privately funded as it would not be covered by council tax charges. Bins stores from which bins would be collected by the refuse operator are positioned either adjacent to the highway (where laybys are proposed) or in locations where refuse vehicles would not impede road traffic. Given the location of these 'collection stores' there is a need for on site management to move bins from stores elsewhere in that block (and adjacent

blocks) ahead of scheduled collections. The strategy is acceptable, but a planning condition is recommended to ensure that full details of on site management arrangements and additional collections are agreed and secured prior to first occupation. These details should also include arrangements to ensure that laybys are available on collection days.

Norwich City Council - Housing strategy

130. Comment: Development proposals for this large, north city, brownfield site are welcomed.
131. 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.
132. The housing options manager has confirmed that there is an ongoing and overwhelming need for one-bedroom properties in the centre/north area and any development of this scale will help to address this. We currently have 2017 applicants on our Choice-based Lettings (Home Options) register requiring a social rent, one bedroom property. Of these, 663 are single people or couples registered in the NR3 postcode area.
133. 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.
134. The local housing needs assessment 2021 (LHNA), prepared as evidence for the Greater Norwich Local Plan, shows a need for a mix of tenures across the city. The requirement in Norwich across the plan period of 2018-2038 shows a need for a total of 11854 new homes of which 6768 are for market housing and 5086 for affordable housing.
135. Of these homes there is a requirement for a total of 3750 1 and 2-bedroom apartments with 2061 of these being for affordable housing of which 1017 are required to be for social rent and as such the proposed social rented properties would make a significant contribution to addressing this specific need in this part of the city.
136. The LHNA has shown a change in tenure requirements from the 2017 strategic housing market assessment, with a greater need for low-cost home ownership, however it is accepted that with a reduced level of 10% affordable housing being viable to be delivered we would wish to focus the affordable housing delivery on social rented dwellings to meet the greatest need. It is therefore proposed to retain the original tenure split for the affordable housing of 85% social rented dwellings and 15% intermediate tenure, most likely to be delivered as low-cost home ownership to meet the identified need.
137. The council particularly welcomes delivery of most of the affordable housing in the earlier phases of the scheme.

Norwich City Council – Landscape

138. The general approach of the Landscape strategy and Landscape masterplan are supported.
139. The hierarchy of proposed streets and spaces would be largely safe, accessible, and attractive. The layout includes a mix of reinstated historic street layout with new public spaces. The creation of a new Botolph Street linking St Augustine's Street and Magdalen Street through a new Anglia Square, together with a new north-south route comprising St George's Square and Street would tie the development into the existing urban fabric. The key focal space of the development retains the location of Anglia Square and its' community functions with an enhanced quality of space.
140. Street widths are somewhat constrained in relation to proposed building heights, although the overall amount of space is sufficient to allow the streets to perform a range of necessary functions. Streets and spaces would be multi-functional accommodating movement, public and private amenity, biodiversity, green infrastructure, and play.
141. The ratio of building heights to width of streets and spaces would cause overshadowing and lack of sunlight in some locations. However, given the higher density of development appropriate to the city centre context, these effects are not excessive. Existing streets around the site perimeter would gain extra space for public benefits, helping to mitigate the effects of taller buildings.
142. Residents would benefit from private and semi-private amenity space in the form of small garden spaces, courtyards, and roof terraces. Although space would be limited, the lack of large-scale open space provision within the development is accepted considering the city centre location, proximity of nearby green spaces and the alternative public realm approach. There is also potential for improving access to and enhancing off-site green infrastructure via a Section 106 agreement.
143. The scale of the built form implies a need for interest and detail at street level to provide quality and functionality in the spaces created by the built form. A lower quantity of green space can also be offset by higher quality provision. The Landscape masterplan includes a palette of hard and soft landscaping elements which would be of sufficient quality to provide character and useable spaces.
144. The Landscape strategy highlights the concept of a layered landscape, with accessible spaces provided at ground level, levels 1 and 2, and with roof terraces adding another layer of landscape. Other non-accessible roof treatments provide further green layering. The 3D layering would provide a variety of external spaces performing a range of functions and is a positive aspect of the overall scheme.
145. The soft landscape scheme would increase biodiversity across the site above existing levels and enable better ecological connectivity both within the site and with the surrounding area.
146. The planting plan provides a significant number of trees in the city centre where finding space for new trees is often difficult. The planting also includes a variety of habitat types to support wildlife, while giving visual interest. Green infrastructure is

integrated into the landscaping and drainage schemes for the site, the design of communal amenity spaces and in green roof treatments.

- 147. Where there are unresolved issues, these are considered capable of being addressed at a detailed level by Conditions. Quality outcomes for external spaces are dependent on good detailing, which is achievable without necessarily impacting other elements of the development.
- 148. Overall, a balance between the high-density building led approach and the creation of safe, inclusive, and accessible spaces would be achieved.
- 149. The scheme provides a layout of streets and spaces with a level of landscape provision which would essentially fulfil landscape policy requirements.
- 150. The public realm proposals would provide a much-needed improvement of the existing site and would contribute to the creation of a sense of place for the development.

Norwich City Council - Tree protection officer

- 151. No objections, subject to the imposition of planning conditions
- 152. The tree group containing T14 and T15 (trees to be removed) is a significant landscape feature in the area, and, as a group, possesses high amenity value. Removal of T14 and T15 will diminish this value (but not to an unacceptable level). However, it is extremely important to secure the future of this group, and the continuing contribution it makes, therefore, I would like to see replacement planting at the eastern end of the group utilizing species that will attain the same stature as the retained trees (e.g., planting 3-4 heavy standard planes or limes).
- 153. Once T14 and T15 are removed, the new highway access/egress will be next to T16. Details on distances/dimensions, and a tree protection plan with method statements will be required prior proposed works being undertaken.
- 154. Due to the number of trees proposed as mitigation, removal of G1, T2, T3 and T6 is acceptable.
- 155. In terms of replacement planting throughout the site, restrictions may occur due to the presence of underground services. Details around number of trees/planting pit design/exact locations would need to be confirmed. Responsibility for watering/aftercare of new trees would also need to be confirmed, as well as long term responsibilities in terms of costs/future maintenance.

Norwich Cycling Campaign

- 156. Response to the scheme as first submitted - We broadly welcome the proposals, and we note you have confirmed that the design of cycle routes will adhere to the currently in-force design guidance LTN 1/20 "Cycle Infrastructure Design".
- 157. Specific comments made to the North- South route - welcome that is to be 4m wide, will be coloured tarmac and will have kerbs to mark its edges. We are however concerned that the route as indicated is not continuous and has sections where the route is unsegregated & shared with pedestrians which will disrupt the route and introduce potential conflicts between different users. Whilst a level

surface maybe used for pedestrian crossing points, the cycling route should be indicated by change of surface colour or contrasting paving.

158. East-west cycle access and Cycling permeability - We note intention not to provide a segregated route along the re-created east-west route (Botolph Street) through the new Anglia Square. We are concerned that the present plans will lead to conflict between cyclists and pedestrians. We expect to see signage saying considerate cycling will be permitted on all the internal routes crossing the site.
159. Southern east-west route - We support the new east-west route along the southern edge of the site. This will provide a useful link and expect it to be designed for Cycling as per LTN 1/20 and should connect with Magdalen Street near the existing flyover.
160. Edward Street crossing - There appeared to be some confusion on the plans so we would like to confirm that the Yellow Pedalway crossing of Edward Street should be a parallel light-controlled crossing, such as on Magpie Road (with separate areas for pedestrians and cyclists) not just a Toucan crossing (which mixes pedestrians and cyclists).
161. Cycle parking - These should be of the Sheffield stand design and located at many locations throughout the development especially close to locations where people will want to go (e.g. near Anglia Square). Stands to be installed with a minimum clearance of 800mm from each other and any building nearby, so that both sides can be easily accessed.

Norwich Society

162. Submitted and amended schemes – Object. The Norwich Society objects to the planning application in its revised form and believes that, as it presently stands, the scheme should be refused permission for the following two reasons.
163. Heritage impact - The revisions have made only very modest changes to the scale and massing of small areas of the overall development and have therefore failed to address the fundamental heritage concerns that were raised in May, both by the statutory body, Historic England, and by other consultees, including the Norwich Society and SAVE Britain's Heritage and many individuals. The Society believes that the revised development proposals still pay insufficient regard to the character and appearance of the Norwich City Centre Conservation Area and to the important heritage assets in the vicinity. Consequently, the development will cause significant harm to heritage interests because of its heights, massing and layout.
164. As the Society said in response to the first consultation, this development has not drawn its primary inspiration from the historic buildings that once occupied this site, nor from the site's current neighbours, which are typically 2-3 storeys in height. Instead, it has taken its lead from the height and bulk of Sovereign House and other blocks which had such a harmful effect when dropped onto Norwich in the 1960s. Taking and exploiting this precedent, and extending it across the entire site, produces large blocks which create an abrupt change in character, dominate their neighbours and transform the street scene to the detriment of the Norwich City Centre Conservation Area.

165. The Society fully agrees with the continuing heritage concerns which are set out in detail in Historic England's objection - In particular, the setting of the grade 1 listed St. Augustine's Church and the grade 2 listed almshouses at 2-12 Gildencroft would still be adversely affected to a high degree. Meanwhile, the opportunity has not been taken to correct the past harms that Anglia Square caused to the setting of Doughty's Hospital.
166. Residential environment - The latest revisions do not adequately address the concerns which the Norwich Society and others raised in May about the poor residential environment which is being built into the proposed development. The Norwich Society believes that the development would not provide the standard of residential environment that should be expected of such an important site, due to its high density and the layout and orientation of the units proposed. On average this proposed development contains only 2.56 habitable rooms per residential unit and it is squeezing 229 of these units into every hectare of land. The Norwich Society's concern extends beyond the overall density of this residential development and goes to the issues of layout, orientation, and amenities that arise from it. The revisions now show a small increase in the number of dual aspect units in the overall development, but this is only a minor improvement, and can only be so within the constraints of the developer's chosen master plan. Half of the units will remain single aspect. Some will face north, or eastwards into an enclosed courtyard, and will receive little or no direct sunlight. Others would enjoy southern or western outlooks where the occupants would need to screen their only habitable rooms from full sunlight at times. Eventually, something approaching 550 households at Anglia Square will find themselves not being able to move between the warmer and cooler sides of their home during the passage of the day or enjoy the benefit of cross ventilation. Those flats which back onto parking podiums would potentially have to endure additional noise and air pollution difficulties. For the great majority of future residents, personal amenity space would be restricted to a single, small balcony.
167. A major residential-led development of high quality is clearly possible here and could certainly be designed with dual aspect living throughout if the will is there. The latest Ash Sakula alternative vision, commissioned by SAVE Britain's Heritage, is not the only possible alternative but it neatly serves to illustrate some key features of a sustainable residential environment that the City Council should be insisting upon in an age of accelerating climate change.
168. The Society asks the Council to vigorously assess the viability evidence now presented in this case and reflect on the potential future consequences of any decision that rests on the belief that there is once again no viable alternative to the current planning application. A development's viability rests on numerous variables and is often subject to volatile market conditions. Of particular interest to the Norwich Society is the site's acquisition costs

SAVE Britain's Heritage

169. Submitted and amended schemes - Object.
170. (Taken from Conclusion from response to first consultation) The existing Anglia Square sits like a cuckoo in the nest within the remarkable medieval core of the city, a comprehensive development that is regarded now by the vast majority of its citizens as a mistake of the 1960s. The success of the new scheme will be judged

in the future not on what was there before, or the previous refused scheme, but the quality of the new development that is built. The public inquiry has presented the owners and developer of this site with a unique opportunity and responsibility to build a high-quality development of an appropriate scale that fits within its historic conservation area context. We are concerned that the plans presented do not achieve this aim, and do not reflect the high importance that the Secretary of State placed on heritage and design issues in his decision.

171. SAVE objects to these proposals on grounds that the scale, massing, and density of blocks proposed will cause substantial and unjustified harm to the character of the Norwich City Centre Conservation Area. Notwithstanding the three outstanding listing applications, we consider the demolition of undesignated heritage assets proposed under the scheme to be unacceptable and substantially harmful to the conservation area.
172. We also consider the total number of units proposed to be excessive for this site, with the number of single aspect home unacceptably high, especially for a scheme in receipt of substantial Homes England grant funding. The mix of unit sizes fails to accord with the objectively assessed housing needs of central Norwich, with insufficient information provided in the plans regarding the amount and management of private and public amenity space proposed for these units. Inconsistencies pertaining to buildings heights in the planning documentation provided, as highlighted above, also require clarification.
173. For these reasons, we consider the plans to be in contravention of national and local planning policy for the protection of Norwich's historic environment and the provision of appropriate housing density, types and design. We therefore call on the Local Planning Authority to refuse planning permission for the scheme in its current form.
174. Whilst we acknowledge the reduction to building heights by one storey at two locations across the scheme (Blocks A and D), we consider these changes to be small in scale and therefore incapable of addressing the harm caused by the overall scale, massing and footprint of the proposed blocks. We also note that extra storeys have been added to Blocks E/F and F, largely annulling any sense of overall reduction of the scheme bulk. Tweaks to dormers and roof gable heights also do nothing to mitigate the scheme's inherently dominant scale and character.
175. The scale and bulk of these blocks remains fundamentally at odds with the finer grain and much lower scale of the surrounding streets to Anglia Square. The amended proposals continue to seek the demolition of the unlisted historic buildings at the southwestern corner of the site, which we consider to be unacceptable in heritage terms. We remain of the view that as the only surviving links to the historic fabric of the area, they should be retained as part of any redevelopment of the site.
176. For these reasons, we consider the cumulative harm of the scheme on the character and significance of Norwich City Centre Conservation Area remains substantial in heritage terms and contrary to the adopted development plan and the NPPF.
177. Second consultation response - Housing provision. Despite minor changes to the number and type of housing units to be built between the detailed and outline

phases of the scheme, the total number of flats proposed (1100) remains unchanged and excessively high for this site. The scheme therefore continues to be at odds the emerging site allocation guidance for Anglia Square - 'Policy GNLP0506' (currently under Regulation 19 consideration) which states that: "*The site will deliver in the region of 800 homes.*" We continue to question the justification for proposing 300 more units than the policy recommendation. The mix of housing continues to conflict with overall housing need and requirements for affordable housing.

178. Design and amenity - We consider the high concentration of single aspect homes can only be a result of the excessive number of units proposed for the site. We continue to consider that a lower scale, conservation led approach to the re-development of Anglia Square is the appropriate design and town planning response to such a key site within the city centre conservation area. Our recent and well-publicised alternative vision by Ash Sakula Architects presents such an approach.
179. For the reasons outlined above, we consider the amended plans do little to allay out previous concerns regarding the harm the scheme will cause in heritage terms and the shortcomings identified in terms of housing provision, design and tenure. As a result, we consider the plans remain in contravention of national and local planning policy, and we call on the Local Planning Authority to refuse planning permission for the scheme in its current form.
180. Third response - we consider the plans remain in contravention of national and local planning policy, and we call on the Local Planning Authority to refuse planning permission for the scheme in its current form.

The Society for the Protection of Ancient Buildings

181. Object to the proposals.
182. Objections to previous iterations of this scheme identified the scale and massing of the proposed structures as fundamentally at odds with the finer grain and lower scale of the streets surrounding Anglia Square. Indeed, Historic England observed that the development would exacerbate the harm of the existing arrangement by consolidating and expanding its mass. This would be detrimental to the significance of the historic city and several listed buildings within the immediate area.
183. The demolition of locally listed historic buildings in the south-west corner of the site was also considered problematic on heritage grounds, with objections stressing the need to retain these buildings as the only surviving links to the historic fabric of the area.
184. The previous proposals were therefore unacceptable on the basis that they would introduce substantial harm to the character and significance of Norwich's City Centre Conservation Area, at odds with legislation, national and local policy, and guidance.
185. Having reviewed the amendments set out in early 2023 (Revision C). There is no change to the scale and building heights, the total number of blocks proposed, or

the overall housing totals, mix and tenure. The demolition of locally listed buildings on Pitt Street remains integral to the proposals.

186. We do not consider that the recent amendments (Revision C) offer meaningful alterations to the scheme, nor do they mitigate the substantial harm the proposals would introduce to the character of historic Norwich.

UK Power Network

187. No objection – informative recommended

Victorian Society

188. Object to the proposals
189. It is incumbent on any proposed redevelopment to respect the surrounding scale of historic buildings and ensure that the setting and views of heritage assets of high significance are protected. Unfortunately, the present scheme fails to ensure this, with multiple buildings between 4 and 8 storeys proposed. Amendments made since the initial proposal have not addressed these concerns, which have been raised by statutory consultees such as Historic Buildings and Places, and other heritage groups. We agree with the comments of SAVE Britain's Heritage that the proposal would cause substantial harm to the significance of the Conservation Area.
190. The proposal also continues to envisage the demolition of non-designated heritage assets at the southern end of Pitt Street. These early C20 buildings have local significance and represent a rare survival in an area which has seen so much postwar development. Considering the level and density of the redevelopment of the rest of the site, we are unconvinced of the need to demolish these non-designated heritage assets for yet further intensive development.

Assessment of planning considerations

Relevant development plan policies

- **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

- **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

- **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
- **Supplementary Planning Documents (SPD)**
 - Affordable housing adopted July 2019
 - Main town centre uses and retail frontages adopted Dec. 2014
 - Open space & play space adopted Oct. 2015
 - Landscape and Trees adopted June 2016

- **Greater Norwich Local Plan**
 - Policy 1 The Sustainable Growth Strategy
 - Policy 2 Sustainable Communities
 - Policy 3 Environmental Protection and Enhancement
 - Policy 4 Homes
 - Policy 6 The Economy (including retail)
 - Policy 7.1 The Norwich Urban Area including fringe parishes
 - Policy GNLP0506 Land at and adjacent to Anglia Square
- **Other**
 - Anglia Square Policy Guidance Note (PGN) adopted 2017
 - Northern City Centre Area Action Plan (2010) expired

Case Assessment

191. 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.
192. The Greater Norwich Local Plan was submitted to the Secretary of State for independent examination on 30 July 2021. Hearing sessions commenced in March 2022 with further sessions on topics such as the housing trajectory and nutrient neutrality being scheduled for March 2023 and sessions relating to Gypsy and Traveller sites being scheduled for July 2023. It is not anticipated that the plan will be adopted until early 2024. Once adopted the plan will supersede the Joint Core Strategy and the Site Allocations Documents for each of the authorities.
193. The National Planning Policy Framework (NPPF) sets out in paragraph 48 that Local Planning Authorities may give weight to relevant policies in emerging plans according to:
 - (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
 - (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and

- (c) the degree of consistency of the relevant policies in the emerging plan to the Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).
194. References are made throughout the report to various GNLP policies. Advice regarding weight to be attached to individual policies is given as the policies are discussed.
195. 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.
196. 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 are considered in Main issue 2 of the report.
197. 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.
198. As advised in paragraph 19, the application site was the subject of a previous planning application (ref: 18/00330/F) which was called in for a decision by the Secretary of State. The application was jointly submitted by the landowner (Columbia Threadneedle) and Weston Homes. The key differences between the previous and current proposals in terms of quantum and mix of development are set out in the table below. The planning decision for application 18/00330/F is appended to the report (Appendix 2). The decision comprises a 134 page Planning Inspector Report (minus Appendices, produced following the four week planning inquiry) and the Secretary of State decision letter.

	18/00330/F	22/00434/F
No of dwellings	Up to 1250	Up to 1100
Commercial space	Up to 11,000 sqm	Up to 8000 sqm
Cinema	3400sqm	-
Hotel	11,350sqm	-
Replacement chapel	On Edward St	Chapel outside of application site and replacement not needed
Public multi-storey car park	600 spaces	-
Residential parking	Up to 910	Up to 450
No of development blocks/parcels	6	12
Range in height (storeys)	3 - 20	1 - 8
Gross Internal floor area (GIA)	176,584sqm	114,148sqm

199. The following assessment considers in detail the planning merits of the proposed development. However, reference is also made to the call-in planning decision. These are circumstances where matters of policy, assessment and judgement, addressed in detailed at the call-in decision, are material to the evaluation and consideration of the proposed scheme.

Main issue 1: Principle of development

200. Key policies and NPPF paragraphs – JCS11, 19, DM12, NPPF sections 5 and 11.
201. Anglia Square is the most significant regeneration opportunity in the northern part of the city centre and one of Norwich City Council's most important priorities for regeneration.
202. 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. Although the centre remains important for the local community the image of the site is poor and the substantial amount of vacant floorspace and land means that Anglia Square does not fulfil the full potential of the site. Out of hours, the centre is unused, unwelcoming, unsightly, and attracts anti-social behaviour and heightened levels of crime.

203. The wider northern city centre is one of the most ethnically and culturally diverse parts of the city, with distinctive local shopping, a vibrant local community and popular location for artists and small start-ups businesses. 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, employment, health and disability and crime. Focusing more closely on income, the site is also in a neighbourhood within the top 10% in the country for the indices of income deprivation affecting older people and children. The Health Impact Assessment submitted with the application highlights that circa 18.3% of the population within the local impact area have a long-term health problem or disability. There is high unmet need for affordable housing. Across Norwich there are currently 2017 applicants on the choice-based lettings (Homes Options) register requiring a social rent one bedroom property. Of these 663 are single people or couples registered in the NR3 postcode area.
204. Unlocking this site for development provides the opportunity to deliver significant and permanent socio-economic and environmental benefits. Development of the site has the potential to deliver environmental enhancement through the remediation of derelict land and buildings; benefits to local people through the creation of new jobs, a substantial number of new homes; an improved district centre; and a significant boost to the local economy through investment and new expenditure which will support both existing businesses and the growth of new enterprise.
205. 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 investors. The council's economic development manager has advised that major redevelopment would be very high profile, the scale of the investment would put Norwich on the "investment map" and would likely act as a catalyst attracting further new investment into the city which could transform the myriad of stalled brownfield city sites which currently await redevelopment. Key sites including Barrack Street site, St Mary's Works on Duke Street, and St George's Works are all within approximately 500m of Anglia Square. The development has the ability to act as a stimulus 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.
206. NPPF paragraph 119 states that as much use as possible should be made of previously developed or 'brownfield' land. Paragraph 120(c) indicates that 'substantial' weight should be given to the *value of using suitable brownfield land within settlements for homes and other identified needs, and supports appropriate opportunities to remediate despoiled, degraded, derelict, contaminated or unstable land*. In terms of Anglia Square, historic land uses increase the likelihood that parts of it are contaminated. Of the 49,241sqm Gross Internal Area (GIA) of existing floorspace on the site, currently 67% (33,267sqm GIA) is vacant. Continued dereliction of the site is neither a sustainable option for Anglia Square nor for Norwich. Bringing forward such sites for development is a core objective of the planning system and the system fails if such sites remain unutilised at a time when sustainable development is a national priority.
207. Development plan policies have reflected this objective for the last two decades. The City of Norwich Replacement Plan (2004) 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. Anglia Square is a large and highly prominent brownfield site within the city centre and its redevelopment forms an integral part of meeting the strategic objective for Norwich city centre as a whole.

208. 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.
209. 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. 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. The expiry of the NCCAAP has had the effect that since April 2016 there has been no site-specific policy relating to development of Anglia Square.
210. Following the expiry of the NCCAAP, Norwich city council adopted the Anglia Square Planning Guidance Note (PGN) in 2017. The council's aim in producing the PGN was 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 remains a non-statutory guidance document but intended to be a material consideration in planning decision taking.
211. 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.
212. The PGN includes a stated future vision for the site along with specific development objectives. These are set out below:
213. 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.

214. The PGN sets a number of development objectives, including: to 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; to 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; and to 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.
215. The draft Greater Norwich Local Plan (GNLP) includes two policies relevant to Anglia Square.
216. GNLP Strategic Policy 7.1 relates to Norwich City Centre and the role it plays as a driver for the Greater Norwich economy. The strategy is for the city centre to provide a high density mix of employment, housing, leisure and other uses and that Anglia Square, as part of the city centre, will be comprehensively redeveloped acting as a catalyst for change in that part of the city.
217. Draft policy GNLP0506 is the proposed site-specific policy for Anglia Square site-specific policy (set out in full in Appendix 5). Under this policy the site is allocated for a residential-led, mixed use development as the focus for an enhanced and improved large district centre and to act as a catalyst for wider investment and redevelopment within the Northern City Centre strategic regeneration area. During the consultation stages of the plan and at the local plan examination hearing sessions, the policy has been subject to a significant level of representation. At issue is not the principle of comprehensive redevelopment of the site but the proposed quantum of development, in particular the proposed number of dwellings.
218. Draft policy GNLP0506 indicates that the site will deliver in the region of 800 homes. Historic England, Norwich Society (NS), Norwich Green Party (NGP) and the landowner/Weston Homes have submitted representations to the policy and participated (with the exception of NS and NGP) in the inquiry hearing sessions. Historic England have challenged the soundness of the proposed quantum of housing, indicating that site capacity has not been sufficiently justified as it is not based on robust supporting evidence, in particular a heritage impact assessment. It has been argued that in the absence of appropriate evidence the policy is unlikely to deliver sustainable development that conserves and enhances the historic environment. In their representations Historic England suggest a figure closer to 600 dwellings might be more appropriate in terms of density and historic grain of the city. The landowner and Weston Homes have jointly made a number of representations to the policy, including to the dwelling numbers, indicating that

the dwelling figure should be determined at planning application stage having regard to the quantum of other uses that are proposed, the sensitivity of the conservation area and development viability.

219. Other aspects of draft Policy GNLP0506 have also been subject to representations by the landowner/developer, in particular the detailed wording of policy criteria relating to retail/leisure offer and parking provision.
220. On this basis, whilst the GNLP is quite well advanced it is advisable to exercise caution in the amount of weight that is given to GNLP0506. Limited weight should be applied to GNLP0506 and the application should largely be determined in light of the policies within the adopted Joint Core Strategy and DM policies plan. Notwithstanding this, the emerging GNLP does show the direction of travel which, in common with development plan policies since 2004 and the 2017 policy guidance note, continues to identify Anglia Square as a site for comprehensive redevelopment. Furthermore, although the 'called in' application was dismissed by the Secretary of State, the reason for dismissal was not due to the principle of development, with the inspector concluding that the regeneration of Anglia Square is an important strategic objective. There is general consensus amongst parties for the need for development and that it should be mixed use recognising both the location of the site within the city centre and the role the site plays in the Anglia Square/Magdalen Street large district centre. The proposition that the development should be residential led is not contested and indeed all parties recognise that the site has capacity to support a large number of new homes. On that basis some weight can be attached to the overarching intent of the policy. Current JCS and DM policies provide a robust framework to consider the planning application for Anglia Square. Regeneration benefits resulting from the site being unlocked for comprehensive regeneration are capable of being afforded substantial weight in the planning balance. Design and quantum of development, the impact on Norwich's historic environment and the quality of new homes are all material considerations in judging the acceptability of the overall scheme. These matters and compliance with relevant development plan policies are considered in detail in the report.

Main issue 2 – Development viability

221. Key policies and NPPF paragraphs – JCS4, DM33, NPPF paragraph 34.
222. As discussed in the previous section of the report the regeneration of Anglia Square has been sought by a number of previous owners and by the Council for a considerable period of time. Although major schemes have been proposed by previous owners and granted planning approval in 2008 and 2013, these retail-led developments proved unviable to implement. In the case of the 2018 planning application the Secretary of State agreed with the Inspector's conclusion that if planning permission was to be granted there was a reasonable prospect that the scheme would be delivered as a whole. However, the Secretary of State went on to refuse permission on other grounds.
223. In all these cases viability has had a bearing on either the decision made by a developer not to proceed with development or in the case of the 2018 application influenced the quantum and mix of development being promoted by the developer and the level of affordable housing proposed. 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 deliver.

224. The Anglia Square PGN includes reference to viability, 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).
225. The council in the knowledge of potential financial barriers to delivering comprehensive development of the site took steps in 2018 to increase the prospects of development being viable. In that year the council submitted a bid for £12.2m of marginal viability funding from the Homes England Housing Infrastructure Fund (HIF). The bid was successful, and Homes England notified the Council of conditional approval of HIF funding in March 2019. This showed that the level of potential grant funding available to support the delivery of the Anglia Square scheme had been increased to £15m (at that time this was the third highest grant award across 94 projects being funded nationally). It is important to note that the bid was supported by evidence around development costs, including substantial costs in relation to site assembly, demolition, site preparation and remediation which at that time were in excess of £16million. Furthermore, the grant approval process included Homes England commissioning an independent development viability assessment. The Council entered a contract with Homes England at that time. In October 2019 Homes England confirmed that the 'availability period' for the HIF grant had been extended to March 2024 given the call-in of the previous scheme and in the knowledge that the developer was actively working on a resubmission.
226. Due to the passage of time, several of the deadlines and milestones in the contract with Homes England have passed. As such, we are in technical breach of the contract, and HE have issued a 'Reservation of Rights' letter. In the event of planning permission being granted for a scheme which could benefit from this time limited funding, the council would immediately enter into discussions with Homes England to expedite a review of the contract and seek amends to both milestones and deadlines, update the contract in light of the changes to the scheme and request an extension of time to the HIF funding Availability Period (to March 2025). Homes England remain positively engaged in the process and are still supportive of providing HIF funding to aid delivery of the scheme. Whilst withdrawal of the HIF funding is a possibility, given on-going discussions and positive engagement from HE, officers are of the view that this is not probable, but Members need to note the risk.
227. Homes England have been clear that they will only enter discussions to revise the contract following a decision on the application. Updated information from the developer is being provided around cash flow, the infrastructure the HIF money will be spent on, and a timetable for spend in order to facilitate discussions quickly should permission be granted.
228. The applicant's consultant, Carter Jonas (CJ) has submitted a Financial Viability Assessment (FVA) with the planning application. This has been amended following changes to the scheme, in response to comments from the council's

independent viability adviser – Avison Young (AY) - and to ensure that it remains up to date, particularly in relation to construction costs.

229. The CJ FVA (February 2023) is based on an assessment of construction and other development costs and residential and commercial values. In terms of construction costs, the initial FVA (April 2022) was accompanied by a detailed cost plan. Given build cost inflation over the past year, with the agreement of AY, the latest version of the FVA uses Building Cost Information Service Construction Data (BCIS) to establish residential and non-residential construction costs. Development costs include S106 contributions totalling £4.5m, which are set out in detail in paragraph 784 of this report. These costs are substantially higher than those previously identified in connection with the call-in scheme given the need to now address nutrient neutrality. For this development, nutrient neutrality mitigation is estimated at £3.79m (based on 2023 values). In relation to value, the appraisal assumes that the scheme will be eligible to benefit from the £15m of HIF funding. In terms of residential values, the assessment takes average 2023 values for comparable developments in Norwich (e.g. Canary Quay, Beckham Place, St James Quay) and applies value growth in phases 2, 3 and 4 of the Anglia Square development. In terms of affordable housing, the FVA includes 10% and values assume a tenure split of 85% social rent units and 15% shared ownership/or other intermediate housing.
230. Based on these and other cost assumptions the latest CJ FVA indicates the following in relation to development profit:

	Net Realisation	Total Costs	Profit	Profit on Gross Development Value
CIL Paid	£313.8m	£286.6	£27.2	9.1%
With CIL ECR	£313.8m	£278.9	£34.9m	11.7%

231. To reiterate, these profit levels are based on current development costs and the prospect of an uplift in development values in the years over which the development will be constructed. Avison Young refer to this as a 'Regeneration Uplift'.
232. In terms of CIL, liability for the detailed element of the application is £2,384,609.36 and the outline is estimated at £5,285,811.29. A CIL total of £7,670,421 (2023 charging levels) has been factored into the CIL Paid appraisal. In paragraph 6.2 of the CJ FVA it is stated that:

CIL exceptional circumstances relief is necessary in order to ensure the development is deliverable:

Without paying CIL, the Scheme secures 11.7% profit and there is a reasonable chance – with cost savings and additional value uplifts - that a profit margin of 15% or greater is achievable. There is considerable market risk, but a level which a competent developer may consider proceeding [with].

If CIL was required to be paid – this would generate a lower (9.1%) profit margin – this materially increases the risk to the developer, making development much less likely.

233. On this basis, Weston Homes have confirmed, in the event of planning permission being approved, their intention to make an application to Norwich City Council for CIL exceptional circumstances relief (ECR). The CIL Regulations only allow applications to be made for CIL ECR once development becomes 'chargeable', that is after the grant of planning consent. On the grant of planning consent, only the development covered by the detailed part of the application would become chargeable. Development covered by the outline part of the application would become chargeable on the approval of reserved matters and therefore if relief was to be sought, a second ECR application would need to be made.
234. Following first submission of the planning application, Avison Young on behalf of the council carried out an independent financial viability review (FVR) of the proposed scheme. This review included a full independent cost audit of the proposed construction costs, an assessment of residential and commercial values and an assessment of Benchmark Land Value (BLV). The assessment of the BLV is an important part of the financial viability assessment process. The Planning Practice Guidance (PPG) and Royal Institute of Chartered Surveyors (RICS) Guidance on viability identifies EUV+ (Existing Use Value) as the primary approach for assessing BLV. The EUV+ method is based on the current use value of a site plus an appropriate site premium. The principle is that a landowner should receive at least the value of the land in its 'pre-permission' use plus an additional incentive to release the site for development. Norwich's Affordable Housing Supplementary Planning Document (SPD) (2019) advocates a 15% premium on brownfield sites. AY have assessed the EUV + value for the site to be £11.65m. AY have undertaken a further review of the latest CJ FVA (dated February 2023). The latest CJ FVA reviewed by AY includes £11.65m as the EUV+ for the site.
235. The AY latest review indicates the following:

	Base Appraisal		Regeneration Uplift	
	Including CIL	Excluding CIL	Including CIL	Excluding CIL
Net Realisation	£288.2m	£288.2m	£326.8m	£326.8m
Total Costs	£283.2m	£275.8m	£283.8m	£275.8m
Profit	£5.0m (1.8% on GDV)	£13.1m (4.8% on GDV)	£42.9m (13.7% on GDV)	£51.0m (16.3% on GDV)

236. The AY FVR assumes the availability of HIF funding. Grant funding in the early phases of the development has a significant impact on cash flow, finance costs and developer risk. The AY assessment also assumes the provision of affordable housing at 10%, 85:15 tenure split.

237. The viability outputs in the AY table above (columns 2 and 3) relate to the current 'Base' position, that is current development costs and values. For comparison purposes columns 4 and 5, apply the 'Regeneration Uplift' used in the CJ FVA. AY assumptions regarding baseline residential values are more optimistic than values used by CJ. This accounts for most of the differential between the profit on GDV percentages. It is important to note that both the CJ and the AY 'Regeneration Uplift' appraisals do not take account of future build cost inflation or finance costs. They therefore represent the 'best case' scenarios. On this basis Avison Young have advised that they do not believe the scheme can support more than the proposed 10% affordable housing.
238. The viability position raises a number of questions:
- (i) Whether it has been demonstrated that the development is providing the maximum level of affordable housing that is viable;
 - (ii) Whether there is a reasonable prospect that the development will be delivered as a whole;
 - (iii) Whether there are alternative development approaches that may be viable and deliverable; and
 - (iv) The weight to be attached to a deliverable scheme in the planning balance.

(i) Whether it has been demonstrated that the development is providing the maximum level of affordable housing that is viable

239. With the 10% affordable housing levels proposed, the base level profit projections are 1.8% including CIL and 4.8% excluding CIL. The best-case scenario forecasts produce profit levels of 9.1% (CJ) and 13.7% (AY). In all cases, the profit levels forecast are below industry profit targets. In relation to what constitutes an acceptable profit level for development to come forward, the PPG states that for the purposes of plan making *"an assumption of 15-20% of gross development value (GDV) may be considered a suitable return to developers in order to establish the viability of plan policies. Plan makers may choose to apply alternative figures where there is evidence to support this according to the type, scale and risk profile of planned development. A lower figure may be more appropriate in consideration of delivery of affordable housing in circumstances where this guarantees an end sale at a known value and reduces risk. Alternative figures may also be appropriate for different development types."* (Reference 10-018-20190509).
240. Norwich's Affordable Housing SPD states *that given the significant need for affordable housing in Norwich, the council will require reasonable profit for the developer to be at the lower end of the range set out in the PPG (i.e. at around 15%) but will consider enabling this to rise to 17.5% only if it is demonstrated by the applicant that this is justified on grounds of risk and could impact on delivery of the scheme. However, there may be exceptions to this approach, for example, as referenced in the PPG, where a lower rate of profit may be more appropriate for affordable housing schemes where the risk to the developer is significantly reduced.*
241. In relation to the above considerations, the risk profile of this development is considered to be high. Anglia Square is a large brownfield site with significant physical and operational constraints. A 5% cost contingency has been factored

into the appraisals, but this is relatively low given the complexity of the site and recent trends in the costs of building materials and labour. HIF grant has the potential to reduce the level of risk, particularly in the early phases of the development. However, notwithstanding this risk and potential lower profit returns, 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 housing the development would not be considered acceptable in planning terms notwithstanding viability constraints. The implication of this is that regardless of policy DM33 and evidence around development viability, the applicants have been advised that affordable housing requirements would not be adjusted below a meaningful minimum level of 10%.

242. The current viability evidence suggests developer profits are likely to be below 15% on GDV as referenced in Norwich's SPD. The 'best scenario' appraisals indicate that there is a prospect of viability improving over the course of the development. However, these rely on assumptions regarding future residential values along with no construction cost inflation and therefore are not at this stage proven. On this basis, at this stage there is no reliable viability evidence to substantiate the provision of higher levels of affordable housing than the 10% proposed. However, AY have recommended that in the event of planning permission being approved, the Section 106 agreement should include a requirement for further development viability reviews to be carried out. The draft S106 requires future reviews at: reserved matters stage; in the event of substantial delay in the development commencing and/or a phase proceeding and at 30% / 60% / 90% occupation of the development. Once construction and sales commence, reviews can be based on actual costs and values. If the appraisal(s) indicate that developer returns are exceeding expectations and agreed profit levels, the legal agreement would require additional affordable housing to be provided on site unless the council agrees to financial contribution instead. In the case of the final review (90% occupation), additional provision would be in the form of an affordable housing financial contribution.

(ii) Whether there is a reasonable prospect that the development will be delivered as a whole

243. At the call-in inquiry a main matter for consideration by the Planning Inspector was whether or not the development would be delivered in its entirety, i.e., what was the risk of the development stalling before completion. Viability evidence was central to the assessment of this issue. Where development is either not viable or only marginally viable, there is a risk that either a developer will not be in a position to proceed or that development may stall and not be completed. For sites like Anglia Square where development has been identified as a strategic objective, neither of these scenarios would deliver comprehensive development and the broad regeneration benefits sought for the northern city centre and the wider city.
244. In the CJ FVA it is stated that that the scheme is viable, and deliverable based on the following circumstances:

- A delivery strategy where the existing landowner (Columbia Threadneedle) is able to partner with a developer (Weston Homes) and structure land payments/returns in a way which maximises scheme viability through minimising the need for project finance.
- Significant, stepped premiums in residential values in Norwich, driven by the quality of placemaking and the ability to re-position this part of the city.
- Cost savings and efficiencies from a vertically integrated developer who can deliver at a significantly lower cost level.

245. It is further stated that Weston are willing to progress the scheme because they believe their development is the 'right product' to achieve value growth ('regeneration uplift') and that as a building company they are able to achieve significant cost efficiencies and savings going forward. Weston Homes have indicated that their business model is different to the majority of housebuilders and developers in that they are a vertically integrated organisation that not only buys land and manages development but also manages the build process itself. It has in-house operational functional capability including planning & design, utility and infrastructure engineering, technical detail drawing and commercial estimating, surveying and buying. Furthermore, they have wholly owned subsidiaries which provide multi-disciplinary environmental consultancy services; plant hire (cranes, forklifts, cabins etc.) and supply a broad range of materials (such as bathroom fixtures, granite for paths and roads, glass for balconies etc.). This gives Weston more control and greater certainty in managing and delivering large scale construction projects. Notwithstanding this competitive advantage, as referred to in paragraph 232, the applicant has stated that delivery of the scheme would be made much less likely if the payment of CIL was a development requirement.
246. Based on the advice from Avison Young and input from the applicant, officers are satisfied that the development viability position is such that, subject to planning permission being granted, there are reasonable prospects of the development proceeding. Furthermore, given the time limited HIF offer from Homes England, for any development to benefit, it would need to commence in 2023 and proceed at pace. As the HIF grant must be drawn down by the end of March 2024, works eligible for the grant would need to be completed by that date and the development delivered in accordance with the milestones agreed with Homes England.

(iii) Whether there are alternative development approaches that may be viable and deliverable

247. Chapter 3 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 environmental effects, in particular impact on the historic environment to which Historic England, as statutory consultee on heritage, object. 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.

248. The table below sets out alternatives considered by the applicant (rows 1-4). The table is based on the information and analysis set out in chapter 3 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. Rows 5 and 6, have been added by officers.

Option	Description	Applicant's assessment of comparison environmental effect	Applicant's judgement on the option
1	Alternative sites/site boundaries	-	Ruled out: No alternative sites were considered by the applicant due to their 'subject to planning' ownership of the whole site.
2	Do Nothing	<p>Adverse environmental effects related to demolition avoided</p> <p>Moderate adverse impacts on the Church of St Augustines avoided</p> <p>Following Environmental benefits not realised:</p> <p>Moderate beneficial socio-economic effects (employment, expenditure by residents and crime)</p> <p>Major/moderate beneficial socio-economic effects (deprivation experience by existing residents)</p> <p>Moderate heritage impacts on 71 Botolph St, former churches of St Saviour and St James</p>	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	Call-in Scheme	See Appendix 6	Planning permission refused by the Secretary of State

Option	Description	Applicant's assessment of comparison environmental effect	Applicant's judgement on the option
4	Alternative Designs (e.g. layout, heights, massing and other aspects)		Environmental testing of various iterations of the scheme that were considered prior to the submission of the current scheme.
5	Ash Sakula scheme		Added by officers - see paragraph 254
6	Residential - led scheme approximately 800 dwellings		Added by officers – see paragraph 257

249. In terms of Option 1, in relation to this scheme the applicant indicates that no alternative sites have been considered given the commercial agreement with the landowner relates only to the redline boundary of this planning application. However, it should be noted that the boundary of the application site is different to the call-in scheme, in that land to the south side of Anglia Square and extending eastwards towards Magdalen Street is now included. The inclusion of this land allows for greater development and design flexibility.
250. In terms of Option 2, the ES indicates that in this scenario the site would largely remain in its present condition. Compared to the proposed scheme this would avoid short term adverse environmental effects related to demolition and construction as well as the moderate adverse impact of the development on the Church of St Augustines. Without development the socio-economic benefits identified in terms of employment, new housing, supporting existing businesses, reduced crime and addressing deprivation would not be realised. Additionally, the negative impacts of the declining condition of the current buildings will become more pronounced.
251. In terms of Option 3, the ES includes a detailed comparison of the environmental effects of the proposed scheme and the call-in scheme. The assessment highlights the difference between the two schemes in terms of built heritage and townscape impact. In relation to the call-in scheme the applicant identified moderate adverse impact to heritage assets on St Augustines Street as well as eight other statutory listed buildings including Church of St Augustines, Norwich Cathedral and the City Walls and Towers. It should be noted that the SofS found less-than-substantial harm to the setting of a larger number of listed buildings, in two cases towards the upper end of the scale. For the proposed scheme the applicant identifies a moderate adverse impact on St Augustines Church.
252. In terms of Option 4, the ES sets out environmental testing of various iterations of the scheme that were considered prior to the submission of the current scheme. The project has evolved over several iterations since June 2021 through

consultation with various stakeholders and interested parties, including NCC and Historic England. The applicant has indicated that through these stages of development they have attempted to reduce harm while maintaining a viable quantum of development and levels of regeneration benefits.

253. The ES concludes in the absence of the proposed development being implemented, the site would remain in its existing condition, i.e., as a partially vacant site in a central location. It is stated that it would also be reasonable to say that, in the absence of the proposed development, the site's physical fabric and infrastructure is likely to continue to deteriorate. The opportunity to bring the site back into full active use, contribute towards housing provision across Norwich and generate employment opportunities would not be realised.
254. In terms of Option 5, at the call-in inquiry Historic England presented an alternative development approach for the site in the form of a scheme prepared by architects Ash Sakula. The scheme was not put forward as a deliverable planning application. It was said to demonstrate an alternative approach that would produce heritage benefits whilst catering for development consistent with a large district centre. At the inquiry both Historic England and SAVE Britain's Heritage (SAVE) accepted that the scheme was not viable or deliverable in economic conditions at that time nor that the situation was likely to change in a realistic timescale. On that basis the planning Inspector stated that *'whatever the design merits of the Ash Sakula scheme, there is no evidence that it could actually deliver the regeneration of the site that is promoted in the development plan'* and therefore he attached limited weight to it. Since the call-in decision, SAVE have commissioned Ash Sakula to progress the scheme further. The scheme, which has been presented in the press and to the city council, comprises a mixed-use scheme with just under 800 dwellings. SAVE have indicated that the scheme is viable and capable of being delivered without public subsidy, but they have submitted no evidence to substantiate this claim. Therefore, as at the call-inquiry, limited weight can be attached to this scheme as a deliverable form of development.
255. Historic England in their response to the submission scheme commented - *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.*
256. The council has commissioned independent advice on viability in relation to the proposed scheme, and this has included an assessment of land value (EUV+). Avison Young have undertaken this assessment having regard to RICS Guidance, the PPG and Norwich's Affordable Housing SPD. The FVA prepared by AY includes their estimate of BLV figure as does the FVA produced by CJ. The council has not asked AY to assess other different approaches to development and it is questionable how they could do this in the absence of worked up options. However, it is important to note that if there is broad support for the comprehensive development of the whole site, then the BLV and the cost of clearing and preparing the site for redevelopment become substantially 'fixed

costs' and would have a bearing on all alternatives whatever the development approach.

257. Option 6. The previous paragraph is relevant in the context of the draft GNLP policy for Anglia Square which indicates in the region of 800 dwellings for the site and Norwich Society comments that development should be capped at 6 rather than 8 storeys. Although a reduction in height and massing will reduce construction costs, fixed costs remain unchanged. Furthermore, the residential values for upper floors are higher and therefore contribute more profit towards scheme viability. Therefore, based on the financial assessment of the proposed scheme, a similar development approach but with fewer dwellings, would be less viable.

(iv) The weight to be attached to a deliverable scheme in the planning balance

258. There is broad agreement that Anglia Square needs to be developed and indeed redevelopment is now well overdue. The regeneration benefits of replacing unsightly underused buildings with a development that can invigorate the local economy and provides new homes are indisputable. However, there is also evidence that despite well-resourced developer interest over the last 18 years, attempts to unlock the site for development have failed. Such failure has consequences. Firstly, the delay has increasingly disincentivised investment in the site, resulting in existing buildings becoming liabilities given escalating maintenance costs and deterioration in their suitability for beneficial occupation. Secondly, it affects the attractiveness of the site to investors and developers. The size and brownfield nature of the site to some degree limits potential developer interest. When the existing condition of the site, the very substantial upfront costs associated with demolition and site preparation, the costs and complexity of managing a multi-phased construction project and an operational shopping centre and finally risk associated with previous failed planning attempts, are factored in, the field is further narrowed.
259. The applicant has indicated that they are willing and committed to progress this scheme. Both the applicant's and Avison Young's FVA demonstrate HIF funding underpins viability to a significant degree. At this point in time, HIF remains available but is at risk depending on any decision on the application scheme and given the requirement for the entire grant to be drawn down by 31st March 2024. It is not known at this time whether the offer would be withdrawn if an eligible scheme was not able to start this year. Therefore, there is strong evidence that the grant of planning permission for this scheme would unlock this regeneration site and that redevelopment would proceed. As there is no evidence that a viable alternative development would follow in short succession the likely consequence of this scheme not proceeding would be the continuation and worsening of the existing situation. The council's economic manager has commented that, '*Anglia Square will be cited as a high-profile failure which sends a negative message about the city to owners/developers of other sites and to prospective purchasers*'. In this context officers consider substantial weight should be attached to the 'prospect of delivery' of a scheme which is both capable of removing barriers to the redevelopment of Anglia Square and acting as a much-needed stimulus to developers to rejuvenate other neglected or derelict sites in the city.

Main issue 3: Impact of the development on European designated sites of nature conservation interest

260. Key policies and NPPF paragraphs JCS 1, DM1, DM6 and NPPF paragraphs 174-188
261. JCS 1 requires all new development to ensure that there will be no adverse impacts on European and Ramsar designated sites by storm water runoff, water abstraction, or sewage discharge. JCS 1 makes specific reference to development providing sufficient and appropriate local green infrastructure (GI) to minimise visitor pressure. On 9th March 2022 the Council adopted the Norfolk Green Infrastructure and Recreational Avoidance and Mitigation Strategy (GIRAMS). Draft GNLP Policy 3 states that all residential development will address the potential visitor pressure, caused by residents of the development, that would detrimentally impact on sites protected under the Habitat Regulations Directive.
262. Local Authorities, as competent authorities have a legal duty to help protect, conserve and restore European sites (Special Protection Areas (SPAs) and Special Areas of Conservation (SACs)). Protection includes prevention of significant deterioration and significant disturbance.
263. The Dutch Nitrogen Case¹ ('Dutch-N'), heard in the court of Justice of the European Union (CJEU), ruled that where an internationally important site (i.e., Special Areas of Conservation (SACs), Special Protection Areas (SPAs) and Ramsar Sites) is failing to achieve a favourable condition due to pollution, the potential for a new development to add to the nutrient load is "necessarily limited". The Dutch-N case has informed the way in which regulation 63 of the Habitats Regulation 2017 should apply to pollution related incidents. This has resulted in greater scrutiny of proposed developments that are likely to increase nutrient loads to internationally important sites where a reason for unfavourable condition is an excess of a specific pollutant.
264. The proposed scale of residential development at Anglia Square has the potential to impact on European and Ramsar designated sites.
265. The potential for recreational activities to disrupt the protection objectives of Habitats Sites in and around Norfolk is related to the level of growth in each Local Plan 'in combination'; specifically, an increase in population resulting from identified new housing requirements across the County that will in turn ensure more people visit Habitats Sites for recreation. This residential growth, combined with an increase in tourism accommodation, will result in more people visiting and possibly harming Habitats Sites as a result of both nutrient enrichment and through residents visiting sensitive protected sites for recreational purposes.
266. Following the Dutch Nitrogen Case, on the 16 March 2022 Natural England issued new guidance to a second tranche of local planning authorities (including Norwich and other Norfolk authorities) concerning nutrient enrichment and the role local authorities must play in preventing further adverse impacts to protected wetland habitats. The importance of achieving nutrient neutrality stems from evidence that

¹ Joined Cases C-293/17 and C-294/17 Coöperatie Mobilisation for the Environment UA and Others v College van gedeputeerde staten van Limburg and Others

large quantities of nitrogen and phosphate nutrients entering water systems cause excessive growth of algae, a process called 'eutrophication.' This reduces the oxygen content of water which increases the difficulty of survival for aquatic species; subsequently removing a food source for protected species. Local Planning Authorities are now required to consider the impact of nutrient enrichment before planning permission can be granted and therefore all planning applications for certain types of developments in the affected catchments have been put on hold until it can be demonstrated how they will mitigate any additional nutrients arising from them.

267. Without appropriate mitigation the proposed development would have an adverse effect on the integrity of:

- The Broads Special Area of Conservation (SAC)
- Broadland Special Protection Area (SPA)
- Broadland Ramsar
- Breydon Water SPA
- Winterton-Horsey Dunes SAC
- Great Yarmouth and North Denes SPA
- North Norfolk Coast SAC
- North Norfolk Coast SPA
- North Norfolk Coast Ramsar
- The Wash and North Norfolk Coast SAC
- The Wash SPA
- The Wash Ramsar
- Norfolk Valley Fens SAC

268. The Environmental Statement submitted with the application assesses these impacts. Under section 63 of the Habitat Regulations the council, as competent authority, before deciding to give consent to a project that is likely to have a significant effect on a European Site must make an appropriate assessment of the implications of the project for that site in view of that site/s conservation objectives. Where the potential for likely significant effects cannot be excluded, a competent authority must make an appropriate assessment of the implications of the plan or project for that site, in view of the site's conservation objectives. In relation to this development, Appropriate Assessment in relation to both recreational impact and nutrient neutrality is required.

Recreational disturbance avoidance

269. The Norfolk Green Infrastructure and Recreational impact Avoidance and Mitigation Strategy (GIRAMS) has been produced to support Local Planning

Authorities (LPAs) in Norfolk in their statutory requirement to produce 'sound' i.e., legally compliant Local Plans for their administrative or Plan making areas. Norfolk authorities adopted GIRAMS in March 2022. The strategy addresses individual, and the in-combination impacts of recreational impacts at Habitat sites from residential development predicted across Norfolk. In relation to the latter, since 31 March 2022 all local authorities in Norfolk have applied, to relevant permissions, a RAMS tariff of £210.84 (indexed link) per property. These pooled RAMS payments will fund a package of measures to manage and reduce the impact of people making extra visits to Special Areas of Conservations (SACs) in the county, including the Broads and the Norfolk Coast. The second element of the strategy relates to 'GI' and securing the provision on/near development sites Green Infrastructure provision, for the purposes of avoidance in the first instance. 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.

270. In terms of assessing the impact of the proposed development and demonstrating sufficient mitigation is secured to ensure the development will not adversely the integrity of the identified European sites, the applicant's consultant, in a shadow HRA, has set out how the development will meet the requirements of GIRAMS.
271. Firstly, the application for Anglia Square proposes up to 1100 dwellings. Under the RAMS requirement, a tariff payment of up to £231,924 (subject to indexation) would be secured through a S106 Obligation to mitigate the 'in-combination' impact of the development on Norfolk's sensitive sites.
272. Secondly the application proposes both on site and enhanced off-site GI provision. As part of the Appropriate Assessment process, it is necessary to assess the adequacy of this provision.
273. Adopted policies DM3 and DM8 relate to green infrastructure and open space requirements. DM3 requires all new development to make appropriate provision for both the protection of existing and the provision of new green infrastructure as an integral part of the overall design which complements and enhances the development. DM8 relates to open space and recreation and requires all new development to contribute to the provision, enhancement and maintenance of local open space either by means of on-site provision or direct contribution through the community infrastructure levy. Neither of these policies, or accompanying SPD, set out detailed/specific requirements for the amount of GI/open space provision. Draft GNLP policy 3, refers explicitly to the issue of visitor pressure and includes a requirement for the provision or enhancement of adequate green infrastructure, either on the development site or nearby, to provide for the informal recreational needs of the residents as an alternative to visiting the protected sites. The draft policy states that provision should equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace (ANG) Standard).
274. The site is located close to a number of existing green spaces, these are set out in the table below. When viewed against Natural England's ANG Standard, residents of the new development will have access to a choice of green spaces that are capable of offering a range of informal recreational opportunities. In particular Marriott's Way and Mousehold Heath, given their natural green space qualities and accessibility, offer good scope for providing medium to long distance walking

/dog walking/cycling routes through a variety of landscapes - heath, woodland, marsh and riverside. These sites are capable of providing for the recreational opportunities of residents as an alternative to visiting protected sites.

Natural England ANG Standard	Green spaces	Area
Doorstep At least 0.5ha within 200m	Gildencroft Park	0.84ha
	St Augustines church yard	0.32ha
	St Leonards play space	0.03ha
Local At least 2ha within 300m	Entrance to Marriots Way (within 330m) access to 'Train Wood/Wensum Park/Anderson's Meadow group'	12.56ha
Neighbourhood At least 10ha within 1km	Train Wood/Wensum Park/Anderson's Meadow group	12.56ha
	Mousehold Heath	75.01ha
	Waterloo Park	7.35ha
Wider Neighbourhood At least 20ha within 2km	Mousehold Heath	75.01ha
	Lionwood	13.59ha
	Marriotts Way Provide access to the countryside – within city boundary route runs adjacent to Sweet Briar Marsh – 90 acres of fen, rough meadow, grazing marsh, old hedgerows and young woodland.	26 mile long distance walk

275. Given the city centre location of the site and the proximity of accessible green spaces, the shadow HRA, prepared by the applicant sets out proposals for both on-site GI and the enhancement of off-site GI and concludes that with these mitigation measures in place, the proposal will not result in adverse effects on any of the sites in question.

276. On site greenspace is shown on detailed landscape plans and described in detail in Main issue 8 of the report.
277. The off-site GI enhancement proposals have responded to input from the council's landscape and open space teams who have identified improvements that would increase the resilience of local greenspaces to increased informal recreational use. An Enhanced GI (EGI) package of measures has been specified and costed which would deliver improvements to Wensum Park and Gildencroft Park. These improvements have been specified to achieve two objectives of 1) improving the local recreational use and 2) restoring / enhancing the city's green infrastructure network. In addition to the RAMS tariff payment, it is proposed that in the event of planning permission being granted an additional S106 payment of £61,140 is secured to fund the identified EGI works. The works include soft planting proposals, management planning, improved seating and signage. The applicant has committed to providing all new residents with an information pack containing advice regarding on-site and nearby recreation opportunities.
278. Natural England have confirmed that they are satisfied with the conclusions of the shadow HRA and that mitigation measures proposed in relation to both on site and off site EGI should be secured in any planning permission given. On this basis the council as competent authority under the Habitat Regulations confirms adoption of the HRA prepared by the applicant and will secure the necessary mitigation via planning condition and through a S106 Obligation.

Nutrient Neutrality

279. In April 2022 the Norfolk Authorities agreed to work together to address the issue of Nutrient Neutrality as all the Norfolk Authorities, and the Broads Authority area are affected. Royal Haskoning were commissioned to work with us to develop a mitigation strategy for Norfolk.
280. Progress to date has been good: the catchment mapping has been refined to provide greater clarity for all parties on areas which are both in and out of the relevant catchments. The Norfolk wide calculator has been produced in collaboration with Natural England. The Norfolk nutrient budget calculator is a catchment specific tool which has been varied to take into account regional variances from the Natural England calculator and is designed to rapidly calculate the nutrient loading from new residential development in the catchments of the River Wensum SAC and the Broads SAC. The Norfolk calculator utilises the best available scientific evidence and research alongside the latest nutrient neutrality guidance from Natural England (2022). As a result, some of the calculator inputs and assumptions deviate from those advised in the published guidance but there is a detailed guidance report to evidence the assumptions in the calculator.
281. Natural England have written confirming that they 'note[s] that the approach adopted in the Norfolk calculator is broadly consistent with that which underpins *the Natural England nutrient budget calculator*' but with detailed comments on areas where there are differences including occupancy rates, water usage and WwTW discharge rates. In respect of these 3 areas Natural England advise that the Norfolk Authorities, as competent authorities must be satisfied that the evidence underpinning the assumptions in the Norfolk calculator are sufficiently robust and appropriate and advise that the Norfolk calculator is less precautionary than that of Natural England, but that ultimately '*Natural England do not intend to*

raise objection to the Norfolk Authorities using the Norfolk calculator to inform their Appropriate Assessments'. Officers are of the view that the Norfolk calculator is sufficiently robust to justify the grant of planning permission.

282. Royal Haskoning are currently working on short-, medium-, and long-term mitigation solutions and identifying land where these could be implemented to the greatest effect to mitigate nutrient loading from new developments. It may be early summer before associated delivery solutions are up and running. A joint venture is being considered by the Norfolk authorities which will oversee the governance and administration of a catchment wide portfolio of NN mitigation solutions, working with third parties such as Anglian Water and Water Resources East.
283. Very early after the original Natural England advice was issued, the fitting of water efficiency fixtures in existing residential properties was identified as potential form of nutrient mitigation. Norwich City Council commenced work immediately on developing a water usage reduction programme. On behalf of Norwich City Council, a Water Usage Retrofitting (WUR) Study has been undertaken by Royal Haskoning. This work has led to the development of the water saving nutrient mitigation programme.
284. In December 2022 Norwich City Cabinet considered the findings of the Water Usage Retrofitting Study. This study assessed the water savings that could be achieved, within the catchment served by Whitlingham Water Recycling Centre (WRC), through a 5-year programme of retrofitting water efficient fixtures and fittings into the council housing stock. The study found that using such measures in planned bathroom upgrades, void upgrades and in responsive repairs would result in a reduction of existing wastewater flows to Whitlingham WRC and that this would have the effect of freeing up headroom for new homes to be built within that catchment. That is, the water usage saved from the retrofitted properties will be replaced by the additional water from new dwellings. As a result, the volume of water entering the treatment works will stay the same and providing the treatment works operates to its defined permit limit, the effluent discharge concentration remains the same. Given that the retrofit programme has already commenced (April 2022) this provides the scope for mitigation credits to be made available to developers ahead of the catchment wide portfolio measures expected to be available later this year through the joint venture. At the 14 December 2022 meeting of Cabinet, it was agreed that this proposed city council administered mitigation scheme would be further developed and that subject to consultation with Natural England, credits available under the scheme would be offered in the first instance to priority sites listed in Appendix A of the cabinet report. These sites included Anglia Square.
285. During January/February 2023 the details, including the costs, of the mitigation scheme were further developed and refined. The updated WUR Study established that the proposed 5-year retro-fit programme would provide 175.07kg/yr of phosphorous mitigation and 4863.08kg/yr of nitrogen mitigation, equivalent to approximately 2151 new dwellings within the Yare catchment. The mitigation scheme has been subsequently subject to an Appropriate Assessment (Appropriate Assessment for Broads SAC for developments using the Norwich City Council Water Usage Retrofitting Mitigation Scheme – dated 9 March 2023). This demonstrates the effectiveness of the mitigation in ensuring projects will not

adversely affect the integrity of the relevant European sites (Broads SAC – Yare Broads and Marshes SSSI and Broads Ramsar).

286. In a letter dated 22 March 2023 Natural England confirmed that they are satisfied that the evidence, around the water usage retrofitting mitigation scheme achieving Nitrogen and Phosphorus neutrality for selected developments in the Yare sub-catchment of the Broads SAC and Broadland Ramsar, is sound. Furthermore, they confirmed that the document can be used as part of the council's Appropriate Assessment for development that will benefit from the scheme. They indicate that a key component of the Appropriate Assessment is the close monitoring of permissions and the rate of delivery of the retrofitting measures and highlight the council's commitment that permissions should not be granted using the strategy unless the authority is fully satisfied that the provision of the requisite retrofitting measures are assured.
287. The Norfolk nutrient budget calculator has been used to calculate the nutrient budget for the for Anglia Square development. The inputs of the calculator have been verified with involvement from Natural England. Officers are satisfied that based on up to 1100 new dwellings and land use changes the total nutrient budget requirements for the site are: Total Phosphorus 88.76kg/year and Total Nitrogen 2502.76kg/year. The applicant has confirmed that they wish to purchase nutrient mitigation credits available through the Council's Nutrient Neutral Mitigation Scheme. Based on the development requirements the cost of nutrient mitigate credits totals £3,790,393 (equivalent to £3,445.81/per dwelling). This amount would be secured through a S106 Obligation which would require the purchase of mitigation credits on a pro-rata basis prior to the commencement of each phase of development. The cost of credits would be subject to indexation to take account of uplift in CPI.
288. Norwich City Council Water Usage Retrofitting Mitigation Scheme has been subject to Appropriate Assessment and has been found sound. On the basis that the development seeks to benefit from this scheme this Appropriate Assessment satisfies the council's commitment under the Habitat Regulations. The council has considered the proposed rate of build out of the 1100 dwellings and the timescale at which each phase would need to secure mitigation credits. Having regard to the predicted trajectory of each phase and the headroom for new development that will be created by the 5-year council retrofitting programme, officers are satisfied that this development can be granted planning permission. Approval would be conditional on a S106 Obligation which would ensure development (each phase) cannot commence until the council has confirmed that sufficient mitigation has been created through the mitigation scheme and the cost of that mitigation has been paid by the developer.

Main issue 4 Principle of Housing

289. Key policies and NPPF paragraphs JCS 4, 9, 11 DM12, DM13, NPPF section 2 and 5
290. The proposal is a high density residential-led urban regeneration scheme. The application seeks consent for up to 1100 dwellings. A total of 353 are included within the detailed part of the application. The final dwelling number will not be determined until the approval of reserved matters for the remainder of the site. Preliminary proposals for the outline blocks indicate around 709 dwellings

indicative of a total of around 1062. Phasing plans submitted in support of the application indicate that the development would be delivered in four phases commencing in 2023 with completion expected in 2031.

291. 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 in paragraphs 119 and 120 states that as much use as possible should be made of brownfield sites and planning decisions should give substantial weight to the value of using suitable brownfield land for homes and other identified need and support appropriate opportunities to remediate despoiled, degraded, derelict, contaminated land.

292. In relation to housing supply, paragraph 74 of the NPPF requires local authorities to:

“Identify and update annually a supply of specific deliverable sites sufficient to provide a minimum of five years’ worth of housing against their housing requirement set out in adopted strategic policies, or against their local housing need where the strategic policies are more than five years old”.

293. NPPF paragraph 76 requires local authorities to “*monitor progress in building out sites which have permission*”, measuring housing delivery against the Housing Delivery Test (the Test). Where the Test indicates that delivery has fallen below 95% of the local planning authority’s housing requirement over the previous 3 years, the NPPF requires the preparation of an action plan in line with national planning guidance, to assess the causes of under-delivery and identify actions to increase delivery in future year. In situations where the local planning authority cannot demonstrate a five-year supply of deliverable housing sites, applications that involve the provision of housing must be determined taking account of the presumption in favour of sustainable development as set out in the NPPF. In these circumstances paragraph 11(d) states planning permission should be granted unless:

- (i) *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed²; or*
- (ii) *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”.*

294. In relation to this proposal, it is relevant to note that the footnote to 11(d) i) confirms that ‘policies in the Framework’ include those that relate to habitat sites and designated heritage assets.

295. The current adopted local policy context for housing provision is provided by Joint Core Strategy policy 4 (JCS 4), whilst local plan policy DM12 sets out the

² NPPF footnote 7 reads - The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in [paragraph 181](#)) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in [footnote 68 in chapter 16](#)); and areas at risk of flooding or coastal change. [↩](#)

principles that apply to all residential developments in the Norwich area, 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, JCS 4 seeks 85% social rented housing and 15% intermediate tenures.

296. JCS 4, sought that between 2008 and 2026, 33,000 net additional homes (1,833 per year) would 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. However, the evidence upon which these figures are based is now quite old.
297. Draft GNLP Policy 1: The Sustainable Growth Strategy, covers the period 2018 – 2038 and identifies a requirement of around 40,550 new homes with provision being made for a minimum of 49,492 new homes. The proposed policy states that housing commitments are located to meet the need for homes across the area providing good access to services, facilities and jobs, supporting sustainable urban and rural living. Accordingly, in terms of housing distribution 32,691 new homes are to be located in the Norwich urban area, 6672 on new allocations. These housing numbers are based on a local housing needs assessment for the plan period using the Government's standard methodology and 2014-based projections. The evidence base for this emerging policy is considered to represent a more up to date picture of housing need and therefore moderate weight can be attributed to this policy.
298. The latest published Greater Norwich Area Housing Land Supply Assessment (HLSA) covers the period 1 April 2021 to 31 March 2026. As mentioned above, the NPPF includes a Housing Delivery Test (Test) as an annual measurement of housing delivery. Broadland, Norwich and South Norfolk are measured jointly for the purposes of the Test. The results of the Test show that Greater Norwich has delivered 132% of the number of homes required between 2018/19 and 2020/21. JCS4 sets out a three-district requirement. Given the JCS4 is more than 5 years old, housing need is measured against local housing need (LHN). LHN figures from Broadland, Norwich and South Norfolk are aggregated to provide a figure for Greater Norwich. The 2021 HLSA, based upon this calculation of five-year land supply (including the 5% buffer required by the NPPF), demonstrated a 6.01-year supply. This figure is an aggregation of the following figures for each district: Broadland 8.22 years, Norwich 4.37 years and South Norfolk 5.87 years. The HLSA states that notwithstanding the existence of a housing land supply, the Greater Norwich Authorities recognise the need for further housing land, above and beyond the existing commitments to 2038. The Greater Norwich Plan currently at Regulation 24 Examination stage details new allocations across the plan area to meet the housing growth requirements set out in GNLP Policy 1.
299. The issue of Nutrient Neutrality has had a significant impact on housing delivery. The inability to approve residential schemes since March 2022 within the whole of Norwich and within parts of Broadland and South Norfolk has had an immediate impact on 5-year land supply within Greater Norwich and the city. At this point in time Greater Norwich Councils including the city have less than a 5-year supply of deliverable sites for housing when having regard to the temporary impact of the pause in granting consents due to Natural England's Nutrient Neutrality advice. However, it is anticipated that this will be a short-lived position and there is no

evidence that indicates that the issue will undermine the underlying capability of the substantial housing commitment (sum of permitted and allocation development sites) to deliver homes in line with the yearly housing requirements once the issue of Nutrient Neutrality is resolved. The latest published HLSA supports this along with the advanced stage preparation of the GNLP which makes provision for further housing allocations going forward. However, in recent months Greater Norwich Councils have been adopting a precautionary approach when refusing planning applications for new dwellings and determined applications on the basis NPPF paragraph 11(d) on the basis that there is not a demonstrable five-year supply of deliverable housing sites. As such applications have been determined against relevant sustainable development DM policies for that district (DM 1 for Norwich) and paragraph 11(d) of the NPPF, albeit councils have taken the view that the weight given to the benefits of new housing from speculative windfall development should be no greater than that which would be ascribed to housing if a 5-year housing land supply could be demonstrated.

300. Paragraph 182 of the NPPF states that the presumption in favour of sustainable development (and the requirements of paragraph 11) does not apply where the plan or project is likely to have a significant effect on a habitats site (either alone or in combination with other plans or projects) unless an appropriate assessment has concluded that the plan or project will not adversely affect the integrity of the habitats site. This proposed development has been subject to a Habitat Regulations Assessment and the appropriate assessment has concluded that the proposal will not affect the integrity of the habitat sites.
301. Notwithstanding what is considered a short term 5 year-land supply deficit, there remains a significant need for the delivery of housing in Norwich. Both the 2021 HLSA and previous Annual Monitoring Reports (AMRs) have shown that the rate of housing delivery in the city has been highly variable.

Year	Delivery measured against JCS policies (no C2 or PBSA)	Delivery measured at Norwich (includes C2 and PBSA)
2014/15	249	273
2015/16	365	413
2016/17	445	548
2017/18	237	235*
2018/19	927	1085
2019/20	495	798
2020/21	166	300
2021/22	320	316*

*Number is lower than the JCS number because we measure net homes so there was an overall loss due to C2 residential institutions (care homes)/Purpose Built Student Accommodation

302. Norwich's annualised housing requirement based on the adopted Joint Core Strategy is 477 units per annum over the period 2008-26. When figures for both care homes and purpose-built student accommodation are excluded, annual housing delivery targets have been met in only two of the last 8 years. Going forward the draft GNLP includes 38 sites within Norwich to deliver new housing up to 2038. GNLP Policy 7.1 sets out the proposed distribution of housing across the Norwich Urban Areas including the fringe parishes. For Norwich, Anglia Square is the second largest proposed brownfield allocation after East Norwich. The site is of a size to make a significant contribution to Norwich's commitment to deliver new homes in sustainable locations over the new plan period. The 1100 dwellings would represent 16% of Norwich's future housing commitment proposed to be met on newly allocated sites.
303. The purpose of the planning system is to contribute to the achievement of sustainable development. Ensuring new homes are built in sustainable locations is fundamental to meeting this objective. For Greater Norwich, failure of Norwich to deliver their share of new homes within the city will mean that greater proportion of housing need will need to be met in Broadland and South Norfolk, in most cases on greenfield sites. A housing-led scheme for Anglia Square supports the NPPF objective of making as much use as possible of brownfield land for new homes and meeting other identified need. Paragraph 119 of the NPPF is clear that making effective use of land is conditional on safeguarding and improving the environment and ensuring safe and healthy living conditions. These considerations are addressed in the report. In the event that these matters are safeguarded, the NPPF indicates that substantial weight should be attached to using brownfield land for homes. Furthermore, officers consider that substantial weight should be given to the development making a significant contribution to meeting Norwich's housing need but only limited weight to the development addressing a short-term deficit in the 5-year land supply.

Detailed housing proposals

304. Policy DM12 in the Development Management Policies Plan sets out the 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.

DM 12 Criteria (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.

305. The application proposes 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. The quantum of residential development 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.

DM12 criteria (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.

306. These matters are considered in detail in other sections of the report.

DM12 criteria (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.

307. The proposed development includes a wide mix of uses, providing flexible ground floor space for community uses, retail and other towncentre uses. These uses are addressed in Main issue 5 of the report.

DM12 criteria (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.

308. Except for 11 houses on the northern Edward Street site, the scheme consists entirely of flats. The mix includes predominantly 1 and 2 bed flats with a small number of 3 bed flats and duplexes (17 x duplexes within detailed element). A duplex comprises a flat on two floors connected by inner staircase. Table X on page X provide details for each block. The table below shows the proposed range of market housing types included within the detailed part of the application and the indicative range for the whole site covered by the hybrid application (again, for market housing).

Type	1 bed	2 bed 3 person	2 bed 4 person	3 bed
Detailed	35.1%	12.5%	48%	4.3%
Hybrid	41.5%	11.8%	43.8%	2.83%

309. All flats would meet or exceed nationally prescribed space standards. Within the detailed parts of the proposal, flats vary both in size and internal layout. Ground floor flats and those at podium levels have independent front doors and private landscaped frontages. These variations help in creating a mix of typology and choice. Notwithstanding this, given the number of units proposed, this still 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 of, or result in cohesion with, the existing community.
310. The 2021 Local Housing Needs Assessment (LHNA) examines property size and tenure issues in Norwich for the period 2018-38. The LHNA indicates that, of the predicted need for market housing arising from the city council area (6768 dwellings), approximately 25% (1689 dwellings) is predicted to be for 1 and 2+ bedroom flats and 37% (2539) for 1- and 2-bedroom properties. The proposed number of market dwellings within the Anglia Square development (954- 990) therefore has the scope to meet approximately 59% of the need for 1- and 2-

bedroom flats in a single location and 37% of the need for 1- and 2-bedroom properties of all kinds. Based on 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.

311. In terms of dwelling type, the proposed range is likely to limit to some degree 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 Anglia Square, the site is both within Norwich city centre and forms part of a large district centre. In order for the role of the centre to be safeguarded, a policy compliant redevelopment needs to include a significant quantum of floorspace at ground floor level for town centre uses and to ensure that adequate provision is made for the commercial delivery and servicing needs. The site is surrounded by roads, of which St Crispins Road and Pitt Street form part of the strategic network. All the surrounding roads carry city centre traffic levels. These factors limit the practicality and suitability of significant proportions of the site for ground floor residential uses particularly for larger family houses. Notwithstanding this, the hybrid part of the application includes less commercial floor space than the detailed part of the site and includes the scope for residential frontages away from the site edges and where environmental conditions would be much improved. These locations would be suitable for a townhouse typology and/or a greater proportion of duplexes. The proposed development approach relies on the main site being divided into 10 development parcels (A, D, E/EF, F, G, H, J, J3, K/L and M) and distribution of the housing number across these parcels. If it is accepted that a significant quantum of dwellings is required to make the development viable, and to optimise the capacity of a brownfield city centre site, then the scope to include conventional housing on this site becomes highly limited. However, larger 4 person+ units and duplexes are compatible with this approach, offering family sized accommodation and scope for enlivening the character and function of the development at street level. The 'all residential' outline blocks offer good opportunity for duplexes.
312. Although the proportion of traditional family houses may be low the development is nevertheless likely to support a range of households. The new residential quarter is likely to be attractive to young families, couples, singles, sharers and downsizers.
313. 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 7 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.

Tenure Mix (including Affordable housing)

314. The development will include both privately owned and rented dwellings. Furthermore, the development will include social rented and intermediate properties.

315. 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 schemes of the scale of Anglia Square was set at 33% with approximately 85% social rent and 15% intermediate tenures. The policy has always allowed for this figure to be reduced to reflect the impact delivering affordable housing can have upon development viability.
316. Draft GNLP Policy 5 is based on the most up to date local housing information (Strategic Housing Market Assessment (2017), the Greater Norwich Viability Study (2019) and the Greater Norwich Local Housing Needs Assessment (2021)). GNLP 5 requires major residential development proposals to provide 33% affordable housing across the plan area, except in Norwich City Centre where the requirement is at least 28%. GNLP 5 also allows for reductions in the provision of affordable housing on brownfields sites through a viability appraisal at the decision-making stage.
317. Until the adoption of the GNLP, the JCS remains the adopted development plan and as such the affordable housing requirements set out in JCS4 should continue to be afforded full weight.
318. Text supporting the policy states that the most recent viability study findings conclude that centrally located brownfield sites which have higher development costs which affect viability, are generally able to provide 28% affordable housing. It is further stated, as national planning guidance makes it clear that where applicants can demonstrate particular circumstances that justify the need for a viability assessment at the planning application stage, the policy provides some flexibility on this point for brownfield sites where exceptional costs are more likely.
319. Paragraph 65 of the NPPF states planning decisions for major development involving the provision of housing should expect at least 10% of the homes to be available for affordable home ownership.
320. 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.
321. The proposal includes the demolition of substantial vacant buildings and applying the credit in accordance with the SPD has the effect of reducing the policy compliant affordable level for the proposed development to 22.6% against JCS 4 policy requirements (equivalent to 248 dwellings) (or 19.2% against GNLP 5 equivalent to 209 dwellings). Both JCS 4 and emerging GNLP 5 allow for the viable level of affordable housing to be determined at planning application stage having regard to specific site circumstances and evidence of exceptional costs.
322. The application proposes a minimum of 10% affordable dwellings - tenure split 85:15 social rent: intermediate product. 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 below both JCS and GNLP policy compliance levels 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 policy compliant affordable housing provision (22.6%) and the 10% level proposed is only achievable with the specified level of public subsidy via Housing Investment Fund and CIL Exceptional Circumstances Relief. The independent viability review carried out on behalf of the council, has confirmed 10% to be the viable level of affordable housing and indeed at this level development profit is low in terms of national and local policy guidance terms. As referenced in paragraph 239 the best-case scenario forecasts produce profit levels of 9.1% (CJ) and 13.7% (AY) compared to the 15-20% range referred to in Planning Practice Guidance (PPG). The proposed S106 viability review mechanism is designed to secure additional affordable housing provision in the event of the viability position improving.

323. The detailed part of the application includes affordable housing provision in blocks B, C and K/L. This provision includes 11 x 2 bed houses, 61 x 1-bedroom flats and 2 x 2-bedroom flats, of which 58 would be for social rent and 16 for shared ownership. Block B and C are proposed as part of phase 1 of the development to be delivered 2023- 2025 and block K/L in phase 2, which will be delivered 2025 – 2026. It is proposed that the remaining tranche of affordable provision would be in block E in phase 4. Depending on the overall dwelling total for the development, between 32- 36 dwellings would be delivered in this phase, all for social rent.
324. The council's development strategy manager has advised that 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). Of the total number of affordable dwellings required in Norwich across the plan period 2018-2038, 6768 in total, there is a need for 1451, 1x bed dwellings. The housing options manager has confirmed that there is an ongoing and overwhelming need for one-bedroom properties in the centre/north area and any development of this scale will assist in this need being met. Currently there are 2017 applicants on the council's Choice-based Lettings (Home Options) register requiring a social rent, one bedroom property. Of these, 663 are single people or couples registered in the NR3 postcode area.
325. The council's development strategy manager has advised that the Local Housing Needs Assessment (LHNA) has shown a change in tenure requirements from the 2017 strategic housing market assessment, with a greater need for low-cost home ownership. However, given the proposed 10% level of provision he supports affordable housing provision being focused on social rented dwellings to meet the greatest need. He advises that it is justified to retain the JCS4 tenure split for the affordable housing of 85% social rented dwellings and 15% intermediate tenure, most likely to be delivered as low-cost home ownership to meet the identified need. Furthermore, on the basis of this evidence it is not considered appropriate for the requirement of paragraph 65 of the NPPF to be met. This requires for at least 10% of the total number of proposed homes to be available for affordable home ownership (1100, 10%=110). The effect of doing so would be that all the affordable provision on the site would be for affordable home ownership. This

would significantly prejudice the ability to meet identified housing need which remains predominantly for rented homes. The council's development strategy manager welcomes delivery of the majority of the affordable housing in the earlier phases of the scheme.

326. In terms of DM12 the proposal provides for a viable tenure mix. Affordable dwellings are shown distributed across the development in four locations. 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 council's development manager 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 and that given that 43% of the provision is being made in phase 1 and 26% in phase 2 a significant proportion of the social housing would be available in the earlier phases of delivery. The Council will secure this delivery through the S106 agreement to ensure the affordable housing comes forward early in the construction process.

DM12 Criteria (e) - 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.

327. The proposed residential density of this development of the main site (excluding development parcels B and C) is approximately 248 dwellings per hectare (1054 dwellings/4.25Ha). This density is high and would exceed that of any other residential scheme elsewhere within the city.
328. 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 i.e., city centres and areas well served by public transport, are recognised as providing the optimal potential for achieving higher densities. Paragraph 124 of the NPPF relates to achieving appropriate densities. It is stated that decision making should support development that makes efficient use of land, taking into account the following:
- (a) the identified need for different types of housing and other forms of development, and the availability of land suitable for accommodating it;
 - (b) local market conditions and viability;
 - (c) the availability and capacity of infrastructure and services – both existing and proposed – as well as their potential for further improvement and the scope to promote sustainable travel modes that limit future car use;
 - (d) the desirability of maintaining an area's prevailing character and setting (including residential gardens), or of promoting regeneration and change; and
 - (e) the importance of securing well-designed, attractive and healthy places
329. Both Local Plan policies 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. DM12 states that 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...In the city centre, within and adjoining district and local centres and in other locations of high accessibility higher densities will be accepted taking account of identified housing needs and the need to protect character, local distinctiveness and heritage significance*”.

330. 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. 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 conclusion.

DM12 Criteria (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).

331. 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

332. Key policies and NPPF paragraphs: JCS 11, JCS19, DM18, DM20, DM21 and NPPF paragraphs 85-91
333. 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 Norwich's northern suburbs and extending out as far as the outer ring road.
334. The adopted Norwich Local Plan (2014) carries forward the Large District Centre designation, identifying it on the Policies Map. Policy DM18 relates to retail, leisure and other main town centre uses in centres and policy DM20 manages change in primary and secondary retail areas and large district centres. The Local Plan policies are supplemented by the 'Main town centre uses and retail frontages Supplementary Planning Document' (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, including seeking to maintain a minimum of 60% of the 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.

335. 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 Policy Guidance Note (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'*.
336. As part of the preparation of the Greater Norwich Local Plan a number of studies have been commissioned. A health check of the centre carried out as part of the Greater Norwich Employment, Town Centre and Retail Study (GVA 2017) 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.*

337. In 2020 a further study was commissioned to update the Town Centre and Retail Study in response to Brexit and Covid-19 impacts and changes to the planning system particularly in relation to the amalgamation of uses classes into Class E. This study included a review of existing retail related policies including Local Plan policies DM18, 20 and 21. In relation to DM20 which relates to large district centres, the study recommended a move towards qualitative assessment factors, focusing upon the character of proposed uses, contribution to active frontages and the overall health of the centre.
338. In terms of GNLPO506 the policy draft includes several references to the role of Anglia Square as an LDC. These include future redevelopment of the site allowing for a balanced mix of uses to support the LDC, including residential, student accommodation, retail, leisure offices, flexible workspace, hotel, leisure, hospitality uses and community facilities. Policy criteria 3) makes specific reference to development including a significantly improved quality of retail/leisure offer providing a continuous active frontage between Magdalen Street and St Augustines Street.
339. The application proposes the phased demolition and redevelopment of the entirety of the existing shopping centre. The centre, currently used for a variety of uses within the Class E town centre use class and sui generis uses (nail bar / bookmakers/car sales), would be demolished and replaced with up to 8,000 sqm Net Internal Area (NIA) flexible retail, commercial and other non-residential floorspace including a Community Hub.
340. The table below sets out existing floorspace figures for different categories of use. The sui-generis figure includes the large unit within the square currently used for car sales and car wash use on Pitt Street. The vacant figure includes the former cinema and nightclub. Excluding these figures and focusing on existing active town centre uses, the current floorspace figures equates to 10,075sqm Gross Internal Area (GIA).

Use class	Existing sq.m Gross Internal Area (GIA) *
Class E (a) – Convenience retail	1568
Class E (a) – Comparison retail	7334
Class E (a) - Retail services (hairdressers, opticians)	219
Class E – Leisure services	338
Sui Generis	4196
Vacant	3772
Class E (g)(ii) - Offices	16,161

341. 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 Local Plan. Appendix 4 sets no specific

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

342. 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 potentially undermine the ability of the centre to serve a district centre function and would be resisted on policy grounds.
343. A 'Commercial Strategy and Town Centres uses Report' has been submitted with the planning application. This document sets out the applicant's vision for the Anglia Square development as being to *'deliver a successful, appropriately scaled shopping and multi-purpose environment for the Large District Centre. Importantly, the scheme will provide a draw beyond 'low value' retail and introduce a range of other facilities and attractions not currently found locally, providing an enhanced offer and experience for local shoppers and other visitors to the northern part of the City Centre'*. It is stated that the new accommodation will be better suited to the needs of tenants than is presently available, providing improved space for existing (retained) tenants and attracting a broader mix of new ones thus having a positive effect on nearby businesses and ensuring the scheme's anchor role within the Large District centre.
344. The table below sets out proposed non-residential floorspace in each block.

Use Class	Blocks	Total Proposed floorspace (sqm Net Internal Area (NIA))	Notes
Class E(a-g) plus Sui-generis (drinking establishments with expanded food provision / book makers / nail bars / dry cleaners)	Block A	1,151sqm	Scope for a large format store of 752 sqm (NIA)
Class E(a-g) plus Sui-generis (drinking establishments with expanded food provision / book makers / nail bars / dry cleaners)	Block M	586sqm	Scope for large format of 503sqm for a new Foodstore
Class E(a-g) plus Sui-generis (drinking establishments with expanded food provision / book makers / nail bars / dry cleaners)	Block KL	3070sqm (including a 477sqm mezzanine)	Scope for 2 x large format stores of 765sqm and 580-1sqm

Use Class	Blocks	Total Proposed floorspace (sqm Net Internal Area (NIA))	Notes
Class E(a-g) plus Sui-generis (drinking establishments with expanded food provision / book makers / nail bars / dry cleaners)	J3	401 sqm	
Class F2 (b)	Block D	697sqm	Community hub/community hall
Sui generis	Block A	50sqm	Public toilets
Total for detailed element		5906sqm	
Outline - Class E (a-g) plus Sui-generis (drinking establishments with expanded food provision / book makers / nail bars / dry cleaners)	Blocks E-J	Up to 2094sqm	

345. The proposed detailed floor plans submitted for blocks A, D, M, K/L and J3 include a total 5906sqm (NIA) of floorspace for flexible commercial/community uses (74% of the proposed total). The above table shows distribution and scope for large format units. The detailed ground floor plans indicate the commercial floorspace subdivided into 23 units. However, to some extent this is illustrative as the applicant is seeking flexibility for the use and size of individual units to be determined based on actual tenant/market interest at the time the floorspace for each block becomes available. However, the applicant has confirmed that the four large format units set out in the above table are firm proposals. The large format units within Blocks A and K/L would be of a suitable size to provide relocation options for Iceland, Poundland, Boots and / or other existing tenants. The large format store in Block M is designed to attract a new food retailer to the centre. The remaining 2553 sqm of floorspace in those blocks would be available for subdivision into a range of small-medium format units.
346. In terms of the outline blocks, the land use parameter plans show commercial frontages to parts of blocks E, E/F, F, H and J and the Planning Statement indicates this would allow for up to 2094 sqm (NIA) of floorspace for flexible commercial/community uses to come forward as part of reserved matters applications. The parameter plans indicate that most of this floorspace would front Anglia Square and the E-W route crossing the site. Two further commercial units are shown on the Pitt Street frontage and on the corner fronting the St Crispins roundabout.

347. The 'Commercial Strategy Report' describes how other aspects of the proposal will further support the functioning of the district centre. These include the inclusion of community facilities within the community hub building (Block D); provision of a public house, provision of a four storey multi-purpose commercial building at the Magdalen Street gateway into the site and the re-provision of an improved multi-functional public square.
348. In relation to community facilities, it is proposed that these would be provided in Block D, referred to as the Community Hub. The facilities would include two elements: a community hub and a community space. The community space would be at the north end of Block D and comprise of a ground floor space of approximately 146 sqm Net Internal Area (NIA) available for hire by new residents, members of the existing community and local groups and societies. The community hub (550sqm NIA) would occupy the ground floor and part of first floor of the southern end of Block D and is proposed as a mixed-use space. A significant element of the community hub would be a management suite for the development, to oversee the management of the new residential community and to act as a central location where all parcel deliveries would be delivered. Residents would collect parcels from the community hub. Given the role of the hub it is anticipated that this building will be busy with comings and goings and provide opportunities for residents to interact and meet. It is also envisaged that the hub will include social spaces which would be available to all (including the wider community). The delivery and fit out of the community facilities will be secured through the S106 agreement. A public house (with expanded food facility) is proposed to create an additional focal point within the development – it is anticipated that this would front the central public square. A four-storey commercial building is proposed as part of block K/L. This building is proposed in the approximate historic location of 'Stump Cross' on Magdalen Street. This building would provide scope for independent commercial uses on each floor. A redeveloped public square is proposed in the same location of the existing square. It is proposed that the square would be enlarged and that a canopy would extend over appropriately one third of the space. The Landscape Strategy describes the square as the 'Civic Heart' of the development acting as an adaptable community space with the scope for pop-up leisure uses, temporary markets and other events.
349. The applicant has indicated agreement to a range of planning conditions and Section 106 planning obligations:

	Suggested planning conditions
1	Provision of the new foodstore (Block M) measuring min 559 sqm GIA within delivery phase one
2	Restricting the sale of non-food goods within the new foodstore to no more than 20% of the net sales area
3	Provision of the [1 no.] large format store (Block A), Community Hub, Community Hall, and the WC / Changing Places facility within delivery phase one
4	Provision of the [2 no.] large format stores (Block K/L) within delivery phase two

	Suggested planning conditions
5	Restricting the primary use of the 3 no. large format stores (in Blocks A and K/L) to Class E(a) retail
6	Limiting the provision of Sui Generis drinking establishments with expanded food provision, bookmakers and/or nail bars within the entire scheme to no more than 550 sqm NIA (611 sqm GIA), of which no more than 250 sqm NIA (278 sqm GIA) shall be used as bookmakers
7	Provision of no less than 200 sqm GIA of floorspace for Class E(b) food and drink or Sui Generis drinking establishments with expanded food provision
8	Limiting the provision of Sui Generis dry cleaners within the entire scheme to no more than 150 sqm NIA (167 sqm GIA)

350. It should be noted that 6) in the table above is in part sought by the applicant to allow for the retention of existing sui-generis tenants - i.e currently on the site: existing nail bar at 76 sqm and existing bookmakers at 276sqm. Furthermore, 8) is sought to allow for the flexibility for a dry-cleaning service on the site that does not exist presently.
351. The applicant has agreed to S106 Obligations in relation to (i) specification and fit-out of the community hub and community space and the agreement of a detailed management plan, (ii) an Anglia Square Management Plan, which would set out arrangements for managing the impact of the redevelopment on existing tenants and (iii) a public realm plan – setting out how the public realm will be delivered, managed and maintained for use by the public.
352. In terms of assessing the acceptability of the changes to this part of the large district centre there are several policy considerations:
- (1) Whether the proposed amount, mix and format of floorspace is sufficient to support the role and health of the district centre for the existing and new community.
 - (2) Impact of the changes on the existing tenants of the centre.
 - (3) Whether the planning conditions and obligations proposed by the applicant are sufficient to allow for the flexibility sought.
353. In relation to (1) - the amount of proposed replacement floorspace for commercial/non-residential uses represents a reduction compared to existing levels. If the shopping centre is looked at in isolation of existing vacant floorspace and Pitt Street premises and floorspace being used for not typical town centre uses (i.e., car sales) then the amount of new floor space is around 11% lower (- 1186sqm GIA) than existing. If all the existing floorspace is included, the reduction is more significant at around 49% (- 8526sqm GIA). The applicant has indicated the existing centre is not fit for purpose and that replacing existing amounts of floorspace is not a viable or sustainable option, pointing to structural changes in the retail and leisure markets both pre and post Covid 19 pandemic. They indicate that these changes have substantially impacted on the demand and value of retail, office, and leisure floorspace both in city centres and secondary

retail locations. The applicant indicates that although existing vacancy levels within the core of the shopping centre are low, this reflects rents being maintained at an appropriate level for a site awaiting redevelopment (i.e., below market rent reflecting a short notice period to allow vacant possession).

354. The application proposes that the new commercial units would meet modern/future needs for businesses and be focused on the Magdalen Street frontage, around the redeveloped Anglia Square and along the frontage of the new East-West route which would link Magdalen Street to St Augustines Street. This would largely maintain a similar length of active frontage to the existing arrangement and create a substantially commercial thoroughfare through the site. Fewer larger format units are proposed than exist at present. The 2017 GVA assessment highlighted the importance of redevelopment including a mixture of floorplate sizes, including larger units to enable current national retailers such as Iceland to continue to have a trading presence in the centre, alongside smaller units for more specialist operators. In response the applicant has confirmed they are in dialogue with existing retailers about the plans and indicated a commitment to the provision of 4 x large format units for Class E(a) retail use.
355. The role played by the existing shopping centre within the wider Large District Centre (LDC) is an important one. The retail offer provided by both national and independent shops, although limited, meets a day-to-day shopping need and the provision is valued by the local community. The shopping square is often busy and is well used for local events and performances. The presence of national retailers within the square supports the anchor role played by the centre for the wider LDC. However, the GVA health check highlighted the limitations of the centre, in particular the current appearance/poor aesthetic appeal, limited supermarket provision and the overall retail function which is little more than functional. The proposed reduction in the amount of floorspace on the site will result in the permanent displacement of some of the existing tenants and some may choose not to stay. However, in considering the redevelopment of the site it is necessary to take account of the significant changes in the retail and leisure sectors over recent years and the long-term viability of commercial floorspace.
356. The NPPF rightly recognises the role town centres play at the heart of local communities but also requires planning policies and decisions to allow centres to diversify in a way that allows them to respond to rapid changes in the retail and leisure industries. The NPPF highlights the role residential development can play in supporting the vitality of centres. What is proposed as part of the proposed redevelopment of Anglia Square will result in the qualitative improvement of the commercial floorspace and of the public realm spaces. There is the scope for existing large national retailers to stay along with smaller scale tenants. Extending food retailing provision and broadening facilities on the site to include community uses and a public house/restaurant use would allow the role of the centre to be diversified and for activity to continue into the evening. The flexibility of uses sought – uses within classes E, F1 and F2 – allows for a wide range of commercial, business, service, local community and learning uses. Conditions 1, 2 and 5 (table) will ensure that retail remains a main focus of the main shopping square. Significantly, the creation of a sizeable residential community on the site will increase the demand for convenience shopping and other day to day services. This increased demand for shopping and services, footfall and expenditure will significantly benefit the long-term role and viability of the whole of the large district centre.

(2) Impact of the changes on the existing tenants of the centre.

357. The development will result in both short- and long-term impacts on existing tenants. The scale and duration (8 years) of the demolition and construction phases will impact on the functioning of the centre and the development once complete will provide less commercial floorspace than at present. DM17 seeks to protect small and medium scale business premises, which would include minimising the impact upon them during redevelopment. To this end, the applicant has indicated that they will seek to ensure that the shopping centre performs as well as possible and continues to serve the local community over this period. It is proposed that the site is developed in phases, allowing for parts of the site to continue to operate and for new floorspace developed in earlier phases to be available to key tenants displaced in later phases. Public access to premises remaining open will be maintained and detailed arrangements including signage will be set out in a Construction Environmental Management Plan (CEMP) which would be a condition of approval. The applicant has indicated that as many of the existing businesses as possible would remain open and accessible during the construction period and in that regard, they have agreed to a Section 106 requirement which would obligate them to engage and support the scheme's tenants throughout the period of disruption. Furthermore, on the recommendation of the city council's Economic Development Manager the S106 also requires the developer to fund access to independent business advice via a local enterprise agency. This would provide tenants with practical advice over relocation/alternative premises as well as potential business adaptation to take advantage of new short and longer term opportunities resulting from the development.
358. These measures should assist in ensuring that centre continues to be available to shoppers throughout the construction period. The provision of a new food store in phase 1 will ensure that from early on in the development, improved provision is made for day-to-day shopping needs. However, it is important to recognise that the development will have a direct impact on all the existing business on the site and that this impact for some tenants will be immediate. It is hoped that a significant proportion will remain and be relocated in the new centre. But a proportion will not, either because they are displaced by the early phases of development at a point where no alternative accommodation can be provided or because the scheme in the longer term does not provide suitable accommodation. All the existing tenants will be aware of this risk as the redevelopment of this site has been planned and publicised for many years. Continued uncertainty regarding the centre is not favourable to businesses being able to plan and make investment decisions. However, the impact will none the less be significant for these businesses and the Anglia Square Management Plan will be important in managing this impact.

(3) Whether the planning conditions and obligations proposed by the applicant are sufficient to allow for the flexibility sought.

359. The applicant has proposed several planning conditions in relation to the proposed new centre. These are designed to control the balance of uses in the centre (paragraph 350). In addition to these conditions the following controls are also recommended to be secured via planning condition.

- Reserved matters for blocks G, H and E to include a minimum amount of floorspace for commercial uses:
Block G – min 420sqm GIA on the Anglia Square/Botolph Street frontage;
Block H – min 360sqm GIA on Anglia Square frontage + min of 160sqm GIA on Botolph Street frontage;
Block E – min 80 sqm GIA on Botolph Street frontage
 - Provision of at least 10 x ground floor units of 70 -100sqm GIA to support the continued role that small scale/independent retail/services play within the square.
360. In addition to the S106 requirements already discussed, the Public Access Obligation in the S106 agreement will secure access to the main public realm areas and streets and require management arrangements to foster the uses of these spaces as social and civic spaces that are accessible to the public without restriction. The provision and management of the community hub is also included as a S106 requirement - to ensure provision includes a mix of uses which will deliver a community benefit including promoting social cohesion. The Sustainable Communities Strategy, a further S106 requirement seeks to ensure that Anglia Square continues to be promoted as a community space for events and activities.
361. On the basis of the above the proposed mix and quantum of town centre floorspace will support the role and health of the large district centre and be complementary to the function of Norwich city centre. Subject to the planning conditions and S106 requirements proposed the proposal accords with policies JCS 11, 19, DM18, DM20 and the NPPF

Main issue 6 Socio– economic considerations

362. Key policies and NPPF paragraphs: JCS 7,11 DM1and NPPF paragraph 7-10
363. 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 Policy Guidance Note (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, and these were referred to in paragraph 203 of the report. These challenges in relation to deprivation, health, housing, and crime all strengthen the case for redevelopment in this part of the city which will deliver meaningful physical, social and economic benefits.
364. 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.
365. The Environmental Statement (ES) submitted with the planning application includes an assessment of the socio-economic impacts 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.

366. 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 6), 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	Residual Effect (including mitigation)
Construction Effects				
Employment (jobs created) Direct: average 276 per annum Indirect: 280 per annum	Local labour market (construction phase)	Wider	Medium-term, temporary	Moderate beneficial
Existing uses/employment	Local Labour market	Local	Short term	Minor adverse
Operational Effects				
Employment Direct: 288 Indirect: 72-186 Uplift on existing: 104 (net) Indirect: 40-106	Local labour market (operational phase)	Local	Long-term permanent	Moderate beneficial
		Wider	Long-term permanent	Minor
Population Approx. 2321 people	Existing population	Local/ wider	Long-term, permanent	~
Resident expenditure £21.9-36.4m	Local economy	Local	Long-term permanent	Moderate beneficial
Deprivation	Levels of deprivation	Local/wider	Long-term permanent	Moderate-major beneficial

Topic	Receptor	Impact area	Duration of impact	Residual Effect (including mitigation)
Housing Up to 1100 dwellings	Housing targets/ housing need	Local	Long-term, permanent	Moderate to major beneficial
		Wider	Long-term, permanent	Moderate beneficial
Crime	Residents' safety	Local	Long-term, permanent	Moderate beneficial
Education early years, primary/secondary	Pupil and school capacity	Local	Long-term permanent	Negligible
Healthcare	Capacity of local services	Local	Long-term permanent	Negligible
Community facilities	Provision of community facilities	Local/wider	Long-term permanent	Minor beneficial
Community Cohesion	Existing population	Local	Long term permanent	Minor beneficial
Open-space, sport and recreation	Provision of open-space and facilities	Local	Long-term permanent	Minor beneficial

367. 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 this 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.
368. **Construction employment.** The proposal represents a £280million 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 276 direct construction jobs per annum. Weston Homes have indicated that they function as construction contractors and have in-house project managers /directors and quantity surveyors who oversee construction and coordination of material supplies and different sub-contractors. But all the construction labour and trades involved in the physical demolition and construction works are external to Weston Homes and on each project Weston Homes go out to tender to companies that operate in the area.
369. In addition, employment supported by the wage spending of construction and supply chain workers in Norwich shops, services and other businesses is estimated at 280 indirect and induced jobs per annum 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.

370. It is predicted that the development will support on-going, sustainable construction employment over four development phases which are expected to span an eight-year period. It is estimated that this would represent an increase of at least 9.28 per cent in the number of construction workers in the city. In addition, the eight-year duration of the build will enable a number of fully completed apprenticeships to be delivered. This is particularly important as it will provide the opportunity for local residents to benefit from training and career opportunities.
371. 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.
372. 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.
373. 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.
374. **Existing Uses/ Employment/ Existing Businesses.** There are several 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.
375. The owners of the site have indicated the following:
- (a) Artist studios in Gildengate House – This building sits within phase 3 of the construction project but demolition is scheduled to start in phase 2. 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. Accordingly, the applicants indicate that there is scope for the artists to remain whilst the initial phase of development comes forward, ensuring a sufficient period for the existing tenants to find alternative accommodation. It should be noted that vehicular access to Gildengate House is via Upper Green Lane (entered from St Crispins Road) and egress is via the unused multi-storey car park onto Edward Street. Phase 1 demolition would remove this egress and this would have implications for vehicular access/parking at this upper level.
 - (b) In respect of the shopping centre, this matter has been already discussed in Main issue 5 of the report. The applicant has confirmed that existing tenants will be given the opportunity to agree commercial terms for retail

accommodation. Discussions are underway and the proposed phased scheme would provide suitable unit sizes to allow for the relocation such as Boots, Greggs and Iceland. However, the first phase of demolition will be at a point where no new commercial accommodation is available on the site and there is limited available ground floor vacant space. Also given the reduced amount of commercial floorspace on the site in the long term there would not be suitable accommodation for all tenants to be relocated. These businesses will therefore need to seek alternative off-site premises.

376. 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 paragraph 359 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 developer funding access to independent business advice /support from a local enterprise agency and ensuring where practicable continued occupancy of buildings throughout the duration of the project. 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 for instance with Magdalen Area Traders Association (amongst other things). Including mitigation, the impact on existing uses/employment is assessed as Minor Adverse in the ES.
377. **Operational Employment** (jobs created following completion of the development project). The precise number of jobs 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. Using employment densities to estimate the job numbers this will generate, in gross terms, it is estimated that 288 full time equivalent (FTE) jobs could be supported (both part-time and full-time roles). Under the same assumptions the site currently supports an estimated 255 jobs which equates to 184 FTE jobs. On this basis, the net employment impact will amount to an uplift of 104 FTE jobs (+ 57%). This could be expected to make a positive impact on local employment opportunities for Norwich residents.
378. 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 112 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.
379. **Population** – Average household size in Norwich is 2.11 people. Within the locality of the site average household size is lower at around 1.8. Applying these averages to the 1100 residential dwellings would result in a population growth of

between 1,980 to 2,321. Given the high proportion of 1- bedroom units it is reasonable that the population would be more aligned to the lower average however the ES has taken the upper figure on the basis of ensuring that the full potential impact of the development is assessed.

380. **Resident Expenditure** - It is estimated that the households of the 1,100 new residential units within the development could generate total gross spend of between £21.9-36.4 million each year. This will include expenditure on convenience (food and drink), comparison goods (clothing and footwear and household goods), services (hairdressers 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.
381. **Housing** - The ES quantifies the impact of the addition of up to 1100 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.
382. The Local Housing Needs Assessment (LHNA) (2021) identifies an ongoing need for new housing and the 1, 2 and 3 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 10% affordable dwellings would boost the supply of social rented accommodation in a part of the city where there is significant identified need.
383. 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 proposed a Community Hub within Block D (Phase 1). This is proposed as a shared, publicly accessible facility offering new facilities to the location and providing the opportunity for all to meet and benefit. Furthermore, the applicant has indicated to the agreement and implementation of a Sustainable Communities Strategy in relation to the development. This strategy would seek to forge links between new residents, commercial tenants and the existing community.
384. 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 in the draft include but are not limited to: promotion of a 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 will provide an appropriate framework for supporting the achievement of these development objectives.

385. **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.'
386. 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.
387. 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 publicly 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.
388. 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.
389. **Crime** - Crime data provided by Norfolk Constabulary indicates that for the past 3 years most incidents have related to theft and criminal damage from/to business and theft from people using the existing centre.
390. 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.
391. The Norfolk Constabulary have recommended the adoption of 'Secured by Design' (SBD) 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 the SBD standards 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.
392. **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 (1100 dwellings)
Early years	82
Infant	108
Junior	128
Secondary	122
Sixth form	13

393. The Local Education Authority indicates that figures currently show capacity in existing schools. At the time of writing there is a decline in both birth rate and pupil rolls influencing the current spare capacity at Early Education, Primary, and Secondary sectors. It is anticipated that there will be a reversal of this decline in the foreseeable future so the County Council will monitor pupil numbers. If further expansion is required for the schools in the area a funding claim for additional places through CIL will be submitted as this is covered on the District Council's Regulation 123 list.
394. The ES quantifies the impact of the development on education provision in the Local Impact Area is assessed to be permanent and negligible.
395. **Health care** – The ES contains an assessment of existing GP and healthcare provision in the locality. It predicts the development will have a negligible impact on health care provision. The Health Impact Assessment (HIA) indicates that the expected population of the proposed development (around 2321) will generate additional needs and demands for healthcare and other social infrastructure which could have an adverse impact on health and well being if there is insufficient capacity in existing facilities. The HIA indicates that the Commissioning Group will need to consider how needs can be met. The HIA refers to the flexible floorspace being provided as part of the development and its suitability for healthcare uses or offices to accommodate supporting services.
396. The latest consultation response (March 2023) from the Norfolk and Waveney Integrated Care System (ICS) states that the proposed development will have an impact on the services of local GP practices, Acute healthcare, Mental healthcare, Community healthcare and the Ambulance service operating within the vicinity of the application site. The practices closest to this development and therefore the primary healthcare services directly impacted by the proposed development are: Prospect Medical Practice, Lawson Road Surgery, Oak Street Medical Practice, Castle Partnership Gurney, and Magdalen Medical Practice. It is stated that the latest demand and capacity information suggests that these practices are already running at or above capacity, will not have the space or the resource to manage the extra demand which a development of this size would place upon them and would need to explore options for increasing space. It is stated that this development would give rise to a need for improvements to capacity, which, in line with the ICS strategic estates strategy, would primarily come from improvements to and extension of existing infrastructure or the building of a new facility. Furthermore, it is stated that the development will also give rise to increased investment requirements within our acute, community and mental healthcare settings, where the investment will be required to provide and develop functionally suitable facilities for patients, providing the required beds and floorspace to manage the increased demand.

397. The response states that 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 (Community Infrastructure Levy) Regulations, which the ICS believes provides for development contributions to be secured to mitigate a development's impact, the ICS typically suggest that healthcare contributions should be sought to contribute to the provision of sustainable healthcare services in the area, particularly for the additional residents generated by development growth. Reference is also made to JCS Policy 7.
398. The ICS have provided an estimated capital cost of additional healthcare services arising from this proposed development as modelled using HUDU tool (London Healthy Urban Development Unit). They seek funding to mitigate the impact of the development across all sectors of health provision, including acute, mental health, Intermediate and primary care (see out in table below). The total amount sought for the detailed part of the application (353 dwellings) is £424,082. They indicate this would be sought either through an application for CIL funding or alternatively by a developer contribution secured by S106. Applying a similar level of tariff to the remaining dwellings in the outline would equate to a further £897,419 (approximate).

Acute Provision	Total
Total Acute Capital Cost	£203,437

Mental Healthcare Provision	Total
Mental Health Beds Capital Cost	£29,327

Intermediate Healthcare Provision	Total
Total Intermediate Capital Cost	£17,294

Primary & Community Healthcare Provision	Total
Primary & Community Care Capital Cost	£174,024

Overall Capital Cost Calculations	Total
	£424,082

399. They state that the ICS Estates Workstream and partner organisations do not have funding to support development growth; therefore, it is essential this is resolved as a matter of priority, in order to effectively mitigate development impact and maintain sustainable healthcare services for the local communities of Norwich. Assuming the above concerns and requests are considered in conjunction with the current application process, the ICS state they would not wish to raise an objection to the proposed development.
400. In response, paragraphs 92 to 103 of the NPPF relate to the promotion of healthy and safe communities. These paragraphs include the consideration of a wide range of matters that contribute to achieving healthy, inclusive and safe places. The Planning Practice Guidance (PPG) (005 53-005-20190722) states that plan-

making bodies will need to discuss their emerging strategy for development at an early stage with NHS England, local Clinical Commissioning Groups, Health and Wellbeing Boards, Sustainability and Transformation Partnerships/Integrated Care Systems (depending on local context), and the implications of development on health and care infrastructure. It is further stated that it is helpful if the Director of Public Health is consulted on any planning applications (including at the pre-application stage) that are likely to have a significant impact on the health and wellbeing of the local population or particular groups within it. This would allow them to work together on any necessary mitigation measures. A health impact assessment is a useful tool to use where there are expected to be significant impacts. Information gathered from this engagement will assist local planning authorities in considering whether the identified impact(s) could be addressed through planning conditions or obligations.

401. JCS 7 relates to Supporting communities. In relation to health, it states 'Appropriate and accessible health facilities and services will be provided across the area including through new or expanded primary health facilities serving the major growth locations. Health Impact Assessments will be required for large-scale housing proposals. Provision will be made for the expansion of the Norfolk and Norwich University Hospital to meet the needs of growing communities' Health Impact Assessments consider the effect on health and social care services along with how the design and planning of the development supports healthy lifestyles and related factors such as crime, social cohesion air pollution etc.
402. The supporting text of JCS 7 states that enhancing quality of life for existing and new communities requires a range of agencies to work together and with developers and that forward planning and joint working should facilitate early provision of infrastructure to support the needs of new and growing communities.
403. The Norfolk Planning in Health Protocol sets out a framework of engagement to foster a closer collaboration between local planning authorities, and other health service organisations to plan for future growth and to promote health. The Protocol includes arrangements for consultation on planning applications (developments of 50 dwellings or more, care homes, student accommodation and any proposal which would lead to a significant loss of public open space). It is stated that discussions and comments provided on all planning applications will make use of the criteria set out in the Health and Wellbeing Checklist (Appendix 1) and that planning officers should make developers aware of this checklist. The checklist is structured around six healthy planning themes: partnership and inclusion; healthy environment; vibrant neighbourhoods; active lifestyles; healthy housing and economic activity. The checklist is intended to inform design and planning of a scheme with the aim of positively contributing to the health and well-being of the community. It should be noted that this document does not have the status of a supplementary planning document.
404. The Norfolk Strategic Planning Framework: Shared Spatial Objectives for a Growing County and Statement of Common Ground includes the following agreement (18):
405. Norfolk authorities agree to endorse the Planning in Health: An Engagement Protocol Between Local Planning Authorities, Public Health and Health Sector Organisations in Norfolk and undertake its commitments. Norfolk authorities agree to consider matters relating to healthy environments and encouraging physical

activity, and fully integrated these into a potential Norfolk-wide design guide and local design codes (which will inform local plans and neighbourhood plans), drawing on key guidance such as Building for a Healthier Life and Active Design.

406. In relation to the Draft GNLP policy 4 relates to strategic infrastructure. Health is included under the heading of 'Other Infrastructure' along with energy, water supply and sewerage networks. The policy states that Greater Norwich local authorities and partners will work together in relation to the timely delivery of improvements to infrastructure. Appendix 1 of the emerging GNLP sets out health care requirements resulting from planned growth, these include primary care, hospital, mental health and community services. No site-specific requirement has been identified for new health facilities to be provided on the Anglia Square site.
407. The involvement of health partners in the development plan process is twofold. Firstly, to ensure that the development plan can include provision for new healthcare infrastructure, for instance expansion of the Norfolk and Norwich University Hospital. Secondly, to ensure health partners' forward planning is guided by evidence regarding planned housing/population growth across Greater Norwich and that they can seek funding accordingly.
408. CIL receipted within the Greater Norwich area is allocated through the Infrastructure Investment Fund (IIF). Applications to the IIF are restricted to the four thematic groups of Transport, Education, Green Infrastructure and Community, as agreed within the Greater Norwich adopted CIL charging policy. The so-called Regulation 123 list confirming the eligibility for CIL was withdrawn from legislation in September 2019, and government has since announced that CIL will be replaced by a new type of Infrastructure Levy. Until the future of CIL is more certain, the Greater Norwich authorities are required to proceed with their adopted CIL charging policy. The IIF continues to be ringfenced to the original four thematic groups, which does not include healthcare.
409. The ICS have indicated that in the event of CIL funding being unavailable they request that a S106 Obligation be used to secure the healthcare contribution. Unfortunately, JCS 7 makes no provision for development to contribute to the funding of additional health services. Although for major schemes (500 + dwellings) a Health Impact Assessment is a policy requirement, this is a broad assessment taking into account a wide range of health determinants (housing design; access to: healthcare and social infrastructure, open space and nature, healthy food, work; accessibility and active travel, noise and air quality; social cohesion etc).
410. Notwithstanding the lack of a clear policy mechanism to secure a developer contribution for health, such obligations can be entered into where they meet the statutory tests set out in regulation 122 (CIL Regulations 2010, as amended by the 2011 and 2019 Regulations). These tests are that the obligation is: i) necessary to make the development acceptable in planning terms, ii) directly related to the development and iii) fairly and reasonable related in scale and kind to the development.
411. The first test is to establish that the funding is necessary in that it serves a planning purpose, and it is needed to enable the development to go ahead. That is, without it planning permission for the development should be refused. This raises an important question in relation to funding. That is where additional health

capacity may be required as a result of new development, whether it is for the local planning authority to require developers to meet the costs of such provision or should/would the funding come from elsewhere. In England, the Secretary of State (SoS) is under a duty to promote a comprehensive health service. Parliament allocates money (raised through general taxation) to the SoS for the NHS. NHS England's function is to arrange for the provision of health services in England and it must exercise its functions in relation to clinical commissioning groups (CCGs) so as to secure that services are provided. It is officers' understanding that CCGs have a statutory duty to provide health services to people living in their area, including those people who move into their area. In terms of the development of Anglia Square, some of the new occupiers are likely to be already resident in the Norfolk and Waveney area and if not, most likely receiving healthcare elsewhere within England. Although it is accepted that migration can result in local pressures, the responsibility for providing health care and ensuring the appropriate apportionment of funding across England remains with the NHS.

412. The ICS have been asked to clarify the issue of funding and to date they have not provided a response. Although it is acknowledged that the NHS is under acute pressure and that both nationally and locally services are struggling to meet need, officers do not consider that the local planning authority has a statutory duty to require development to fund healthcare provision in the manner requested by the ICS.
413. In relation to the second and third tests, namely that the obligation is directly related to the development fairly and reasonably related in scale and kind to the development. It is not clear how the HUDU model, devised by the London Healthy Urban Development Unit, relates to Norwich, the wider Norfolk and Waveney Area nor the specific impacts of the development. Nor is it clear how the sums of money sought across the four health sectors would be used and across what timescale. Without this detail it is not possible to judge whether the 2nd and 3rd tests are met.
414. In recognition that development can result in local pressures in close proximity to the site a meeting has been held with Norfolk & Waveney ICS Estates to establish interest in floorspace proposed as part of the development being used to provide local health services. The developer identified floorspace in blocks J3 (units 1 and 2 totally 210sqm and unit 3, 192 sqm) and F (ground floor + mezzanine 201sqm). The ICS responded, commenting that this would be subject to lease agreement and that there would be a cost to fit out and that following discussion with Primary Care it was established that the space would not be big enough to allow the estimated recommended floorspace outputs of circa 230sqm across all healthcare settings. The developer has subsequently provided an amended plan showing an increase in floorspace in block F (280sqm). The developer has confirmed their agreement to a S106 requirement which would the effect of reserving this floorspace for health-related uses for a fixed period of time to allow firm proposals to be developed and for funding to be secured. However, the ICS in their most recent response has stated that *'although potential space for health care services may have been identified within the development, it is subject to the NHS purchasing or leasing the space. The viability of this option requires additional review. However, this proposal does not respond to the point made above with regards to the lack of funding to mitigate the impacts, nor does it respond to our*

request for developer contributions in response to this particular development and the impact on health and care services in the area.'

The Health Impact Assessment

415. The HIA assesses the baseline demographic, socio-economic and health profile of the local population along with current living environment, levels of community infrastructure provision and environmental conditions. It found: a relatively high proportion of young adults aged 20-39 living in the local area, but a relatively low proportion of children and older people; the ethnic profile of residents is broadly comparable with Norwich and the East of England but that it is more diverse in terms of socio-economic classification and religion.
416. Public health indicators suggest that the key issues in terms of children's health centre is around emergency admissions to hospitals for under 5s and admissions for injuries ages under 15. Turning to adult health, hospital stays due to self-harm is a main issue, while emergency hospital admissions for all causes is high and incidences of lung cancer is significantly higher. The Local Impact Area is one of the most deprived parts of the country, which experiences relatively high incidences of crime. However, the area is well served in terms of community and social infrastructure, as well as public transport. Air quality harm and noise disturbance primarily emanate from the A127.
417. The HIA found that during the construction phase the development is expected to result in medium- term adverse impact on a number of health determinants as a result of the disruption of local provision of services, access across the site and the environmental effects of demolition and building operations. It is proposed that associated risks to health will be minimised through the implementation of a Construction Environmental Management Plan (CEMP) which will ensure that robust measures are in place to manage noise and dust and continued safe pedestrian access routes through the site for tenants and the public throughout the entire construction period. Furthermore, the applicant has agreed to a S106 Obligation in relation to an Anglia Square Management Plan. This would agree arrangements for the operation of the shopping centre during construction to ensure parts of the centre remain open to business and accessible.
418. Post construction when the site is fully occupied and operational, the HIA indicates that the development will have beneficial impact on the health determinants in regard to housing quality and design; access to healthcare services and 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. These benefits are attributed to a number of aspects of the proposal. Firstly, the proposed 1,100 new residential units which include a mix of tenure types and dwelling sizes. Secondly the scope for the development provides for provision of supporting social/community services on-site in the flexible commercial floorspace which will support an increase in the quantum and types of employment opportunities. Thirdly the scheme will provide a wide range of services, high quality public open spaces, and improved pedestrian and cycle connections, all of which are pathways to better health outcomes. The city centre location of the new housing and significant levels of secure cycle parking, given ease of access to all shopping, services, employment and leisure, will promote active travel and health lifestyles. New residents will have convenient access to Marriotts Way and good

quality walking and cycling routes through natural spaces and into the countryside. Within the site, the design offers protection from noise and traffic impacts. On the edges of the performance of fenestration will ensure internal conditions meet World Health Organisation (WHO) standards.

419. The HIA concludes that the development through providing the homes, jobs and services that people need, reducing environmental risks and delivering well designed buildings and safe urban spaces will create the conditions for healthy, active lifestyles.
420. **Open-space, Sport and Recreation** - The additional population 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 1 mile (17min walk). Additionally, 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.
421. The scheme does not allow for large amounts of onsite open greenspace. Communal residential amenity spaces are provided within each of the blocks (at podium and roof level) and at street level vehicle free public realm is proposed. This includes a remodelled Anglia square which would act as a civic square and a communal garden adjacent to the main North – South route through the site – described as St Georges Gardens. These spaces are proposed as multi-functional public spaces and will include tree planting, landscaping, seating and in specified locations, play features. Given the city centre location of the site this approach is considered appropriate. 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.
422. **Community facilities** - The estimated increase in population will give rise to some additional demand for existing community facilities such as libraries, places of worship and community halls.
423. 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. The nearest library to the site is the Norwich Millennium Library.
424. The proposals include a community hub facility in Block D. Approximately 709 m² of floorspace is proposed for community uses including - a community space for hire, café, flexible works space/meeting rooms. 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. It is further proposed that the area under the flyover be approved and made available for public use. Both the provision of the community hub and the delivery of a public realm scheme for under the flyover are matters secured by the S106 Obligation. Furthermore, the Sustainable Communities Strategy referred to in paragraph 361 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 the public spaces on the site.

425. 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.
426. Overall, the development is predicted to have a permanent, minor beneficial effect in terms of community facilities.

Main issue 7 Design and heritage

Introduction and methodology

427. The key development plan policies and NPPF paragraphs relating to the design and conservation assessment of the scheme are JCS2, DM1, DM3, DM9, NPPF sections 12 and 16.
428. Paragraph 126 of the NPPF states “the creation of high quality, beautiful and sustainable 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.”
429. NPPF paragraph 134 says “Development that is not well designed should be refused” and indicates that good design should be defined with reference to local design policies and government guidance on design. Both JCS2 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. The following design evaluation is structured according to the attributes of good design contained in the National Design Guide (which is structured identically to the National Model Design Code) and the connection with the Building for a Healthy Life tool (recommended in paragraph 133 of the NPPF) is made clear. The scheme was also subject to independent design review (as recommended in NPPF paragraph 133) by a Design South East panel at three stages and our evaluation refers to some of their conclusions.
430. 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 paragraph 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.
431. In paragraph 132 the NPPF says that “early discussion between applicants, the local planning authority and local community about the design and style of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants should work closely with those affected by

their proposals to evolve designs that take account of the views of the community. Applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot.” In addition to several rounds of conventional consultation the current scheme has been developed with reference to a community review panel and our evaluation of the scheme in the design section draws on this.

432. 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 given to the desirability of preserving or enhancing the character or appearance of the conservation area. NPPF paragraph 195 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 199) and the implications of identifying levels of harm in relation to different grades of heritage asset are explained in paragraphs 200-203 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.
433. The proposed design of the development has attracted substantial interest from the public, from statutory consultees and non-statutory bodies, albeit generally less critical than the earlier call-in scheme. In general, the comments relate to:
- Quality of place, massing, height, character, local distinctiveness, and architectural quality; and
 - 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.
434. There are also supportive comments that welcome the proposed changes to the area after a long period of decline and dysfunction.
435. The applicant has continued to invest heavily in a design process which seeks to create a new vibrant mixed-use quarter north of the river (‘over the water’) providing the opportunity for transformative change. The Design and Access Statement (DAS) 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, continues to have a strong influence on the overall height and massing of the scheme. That brief is much more conducive to the creation of a well design scheme than the one which underpinned the call-in scheme because a) no multi-storey car park is required and there are reduced

levels of residential parking; b) there is less retail floorspace, no semi-basement cinema and the format of this floorspace is more varied and flexible allowing greater permeability and variety to the ground floor plan; c) no residential tower is included, thereby removing the most controversial and visually impactful element of the call-in scheme; and d) more development land is included at the southern end of the site allowing a similar number of dwellings to be provided over a larger footprint, thereby reducing the height and massing. Nevertheless, the marginal viability of the scheme is a constraint to creating ideal conditions for integration with the surrounding built environment. The approaches that have optimised the level of integration are documented within the DAS and the Heritage and Townscape Visual Impact Assessment (HTVIA).

436. The following evaluation is split into two parts which inevitably overlap in a location like the centre of Norwich where good design needs to recognise the constraints and cues provided by the surrounding historic built environment:
- Heritage, Townscape and Visual Impact Assessment
 - Design Quality evaluation

Heritage, Townscape and Visual Impact Assessment

Introduction

437. The site lies within the city centre conservation area and the development will have an impact on the city centre conservation area and the setting of several highly graded listed buildings within it. It will change the setting of those assets and the contribution the setting makes to the appreciation and significance of those assets, albeit to a much lesser extent than the call-in scheme. Two locally listed buildings on Pitt Street are proposed to be demolished.
438. The application has been accompanied by a HTVIA. The applicants summarise the purpose of the document as being “to determine whether effects arising from the Proposed Development on built heritage, the townscape and visual amenity are likely to be significant and the extent to which it is likely to enhance environmental resources or detract from them, taking into account any mitigation measures incorporated into its design.”
439. It considers the five-step method of assessing how the development would affect the setting of heritage assets and 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.
440. The assessment in the HTVIA provided by the applicant is a thorough and authoritative piece of work. The applicant’s overall conclusion on the significance of heritage assets (on page xi of the addendum to the HTVIA) is that “the Proposed Development would give rise to predominantly beneficial effects overall

through an enhancement to the wider setting, the visual amenity and townscape character of the area. The form, fabric and features of that which are of special interest would be preserved and through the replacement of poor-quality townscape of Anglia Square the wider character". In relation to individual assets, they say "With regard to the effects of the proposed development on the setting of the Grade II listed buildings Doughty's Hospital and 2-12 Gildencroft, it is concluded that a low level of less than substantial harm has been identified through change to the immediate setting." "Overall, the wider setting of Doughty's Hospital and 2-12 Gildencroft would be improved." "With regards to the Non-Designated Heritage Assets 43-45 Pitt Street and Warehouse to the rear of 47-51 Pitt Street. The proposals would see the complete demolition of 43-45 Pitt Street and Warehouse to the rear of 47-51 Pitt Street. The Proposed Development will result in a radical transformation and improvement of the Character Area in spite of the total demolition and permanent loss of nos. 43-45 Pitt Street and the Warehouse to the rear of 47-51 Pitt Street. As such the Development will have a major impact on the significance of this part of the Conservation Area which, overall, is considered to be beneficial."

441. The conclusions of the following assessment largely agree with those reached by the applicant in the document and for the reasons they have articulated but there are some areas of disagreement. To avoid repeating large volumes of content from the HTVIA the tables are presented that are derived from the HTVIA with areas of disagreement and replacement judgements explained.
442. Three organisations with a special remit for and interest in the conservation of the historic environment have commented on the application. They are Historic England, SAVE Britain's Heritage and the Norwich Society. All concluded that the scheme would harm the historic environment and summarised their position as follows:
 - Historic England - "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." (Response to revision A – their position has not changed as a result of subsequent revisions to the scheme)
 - SAVE Britain's Heritage – "Whilst we acknowledge the reduction to building heights by one storey at two locations across the scheme (Blocks A and D), we consider these changes to be small in scale and therefore incapable of addressing the harm caused by the overall scale, massing and footprint of the proposed blocks. We also note that extra storeys have been added to Blocks E/F and F, largely annulling any sense of overall reduction of the scheme bulk. Tweaks to dormers and roof gable heights also do nothing to mitigate the scheme's inherently dominant scale and character. The scale and bulk of these blocks remains fundamentally at odds with the finer grain

and much lower scale of the surrounding streets to Anglia Square. The amended proposals continue to seek the demolition of the unlisted historic buildings at the southwestern corner of the site, which we consider to be unacceptable in heritage terms. We remain of the view that as the only surviving links to the historic fabric of the area, they should be retained as part of any redevelopment of the site.” (Response to revision A). “As set out in our previous letters of objection, we remain opposed to the number of flats proposed under this scheme, and to its overwhelming scale and massing, which we consider would substantially harm the unique historic character of the Norwich City Centre Conservation Area. We also object to the mix of units proposed, the inadequate provision of affordable housing, and the poor layout of the majority of the flats proposed, including the proposal for almost half of all new homes to be single aspect.” (Revision C)

- Norwich Society – “The Society believes that the revised development proposals still pay insufficient regard to the character and appearance of the Norwich City Centre Conservation Area and to the important heritage assets in the vicinity. Consequently, the development will cause significant harm to heritage interests because of its heights, massing and layout”. (Response to revision A – their position has not changed as a result of subsequent revisions to the scheme)

443. The structure of the following assessment mirrors the HTVIA:

- Operational effects on built heritage receptors – operational effects are those that take effect on completion of the scheme and built heritage receptors are heritage assets (including listed buildings, locally listed buildings, conservation areas and registered historic parks and gardens) that derive at least some of their significance from their setting and where that setting will be affected (positively or negatively) by the proposed development.
- Operational effects on townscape receptors – an assessment of the effects on townscape receptors, which are the key components that make up an area of townscape, including its distinctive character that includes aspect such as urban grain, building heights, scale, permeability, legibility, sense of place and the role of water or planting.
- Operational effects on visual receptors – an assessment of the effects on specific views and on the general visual amenity experienced by people at these viewpoints.

444. Effects are assessed by combining the sensitivity of receptors (a heritage asset, townscape, or view) with the magnitude of change to them. This results in an understanding of level of significance of the effects categorised as major, moderate, minor, negligible or no change. A judgement is then made as to whether the effect is beneficial, adverse, or neutral. The combination of these lead to “resultant effects” on a scale: major beneficial, moderate beneficial, minor beneficial, major adverse, moderate adverse, minor adverse, major neutral, moderate neutral, minor neutral, negligible and no change.

445. Beneficial effects are due to:

- Enhancement to the setting or significance of heritage assets,
- Enhancement of the overall townscape quality,
- Enhancement or reinforcement of the key characteristics of the townscape character areas, and / or
- The introduction of features or elements of high design quality, which enhance the existing character and visual enjoyment.

Adverse effects would harm these attributes.

446. Effects can be neutral when they:

- Preserve (or do not materially affect) the setting or significance of heritage assets,
- The degree to which the proposal fits with the existing character,
- The contribution to the landscape that the proposed development may make in its own right, usually by virtue of good design, even if it contrasts with existing character,
- Where a fine balance occurs in the qualitative assessment, 'neutral' is considered the centre point of the scale when balancing beneficial and adverse effects or where change or impact to an asset is identified but other benefits are also delivered through the proposed development.

447. If harm to heritage assets has been identified the NPPF expects (in paragraphs 199-202) this to be categorised as less than substantial or substantial and, although the NPPF does not require it, the degree of less than substantial harm is often attributed, as in the following assessment.

448. The HTVIA includes a set of 40 accurate visual representations / verified views of the scheme from points across the city that are points of maximum visibility and where the scheme is expected to have intervisibility with heritage assets. These were agreed with the applicant after a series of site visits informed by zone of visual influence modelling and discussions with Historic England. They are a source of information that informs the assessment of operational effects on built heritage, townscape and visual receptors.

Operational effects on built heritage receptors

Note: *Italics* (also shown in red on website) denotes disagreement with the applicant's assessment.

Heritage receptor	Designation	Sensitivity	Magnitude of Change	Residual effect
71 Botolph Street	Grade II*	High	Low	Moderate Beneficial
2-9 Octagon Court	Grade II*	High	Low	Moderate Neutral
St Saviour's Church	Grade I	High	<i>Low-Medium</i> Applicant: Low	Moderate Beneficial

Heritage receptor	Designation	Sensitivity	Magnitude of Change	Residual effect
St Augustine's Church	Grade I	High	Low-Medium Applicant: Low	Moderate-Major Neutral-Adverse Applicant: Moderate Adverse
2-12 Gildencroft	Grade II	Medium	Low-medium Applicant: Medium	Minor-Moderate Neutral-Adverse Applicant: Moderate Adverse
31-35 Magdalen Street and Gurney Court	Grade II*	High	Negligible-Low	Minor Beneficial
Old Meeting House	Grade I	High	Low	Moderate Neutral
St Mary's Church	Grade I	High	Low	Moderate Neutral
St Martin at Oak Church	Grade I	High	Low	Moderate Neutral
St George's Colegate	Grade I	High	Low	Moderate Neutral
Bacon's House	Grade II*	High	Low	Moderate Neutral
St Clement's Church	Grade I	High	Low	Moderate Neutral
St James' Church	Grade I	High	Low	Moderate Beneficial
Anglican Cathedral	Grade I	Very high Applicant: High	Negligible-Low Applicant: Low	Moderate Neutral
St Giles' Church	Grade I	High	Low	Moderate Neutral
Norwich Castle	Grade I and Scheduled monument	High	Low-Medium Applicant: Medium	Moderate Neutral Applicant: Major Neutral
Roman Catholic Cathedral of St John the Baptist	Grade I	High	Low	Moderate Neutral
City Hall and Police Station	Grade II*	High	Low Applicant: No rating	Moderate Neutral Applicant: No rating
City Walls and Towers	Scheduled monument	High	Low Applicant: Medium	Moderate Neutral Applicant: Major Neutral
Norwich City Centre	Conservation Area	High Applicant: Medium	Low	Moderate Beneficial Applicant: Minor Beneficial
Waterloo Park	Grade II* RPG	High	Negligible Applicant: Low	Minor Neutral Applicant: Moderate Beneficial
Colegate Group	Grade II LBs and LLBs	Medium	Low	Minor Beneficial
Northern City Group	Grade II LBs and LLBs	Medium	Low-Medium Applicant: Low	Minor-Moderate Neutral Applicant: Minor Beneficial
Anglia Square Group	Grade II LBs and LLBs	Medium	Medium	Moderate Beneficial
Doughty's Hospital	Grade II	Medium	Medium	Moderate Neutral

Heritage receptor	Designation	Sensitivity	Magnitude of Change	Residual effect
43-45 Pitt Street	Locally listed building	Low	Total Loss Applicant: High	Total loss Applicant: Moderate Adverse

449. **Former Church of St. Saviour.** The applicant has ascribed a magnitude of change rating of low to St. Saviour. They say that this large-scale redevelopment a short distance from the building does not constitute a larger change due to the screening and separating effect of the flyover. This is overstated and the change in the setting would be very apparent in views at ground level where there is clear intervisibility beneath the flyover. The applicant's rating of moderate beneficial effect remains appropriate.
450. **Church of St Augustine and 2-12 Gildencroft.** The impact of redeveloping Anglia Square on the significance of St Augustine's Church has been one of the central issues in recent planning deliberations and decisions due to its status as a grade I listed building that is located adjacent to the development site, with a setting that is strongly affected by the existing site condition of Anglia Square and the scale, massing, and architectural treatment of proposed buildings. This section also covers 2-12 Gildencroft, which is closely associated with the church.
451. St Augustine's Church (grade I listed) is the only surviving medieval church within the city centre to the north of St Crispin's Road. It has high architectural value, with many features surviving from its pre-reformation origins, including its almost square plan. The distinctive red brick tower is not original, having been refaced in 1726, but distinguishes the church from the others in the city and supports its function as a recognisable landmark in the area. The craftsmanship invested in the creation of the buildings lends it high aesthetic value, both externally and internally. The church sits within a large churchyard containing the burials of generations of inhabitants of the parish. This contributes to the church's communal, evidential and historical value. The size of the churchyard and its relationship with the Gildencroft and Quaker Burial ground open spaces to the south underline that this part of the city centre was historically less developed than elsewhere. The churchyard is framed by the 16th century almshouses at 2-12 Gildencroft (grade II) that run along the southern edge of the churchyard and forms a pairing of historic buildings with the church. The size of the churchyard also allows the architectural value and aesthetic quality of the church and 2-12 Gildencroft to be appreciated singly and in combination. The setting is more intact to the north where the important relationship with the busy thoroughfare of St Augustine's Street and its many intact historic buildings remains.
452. Other streets of a similar character to St Augustine's Street to the east of the church were lost in second world war bombing and the subsequent demolition of many more buildings in the 1960s to create the Anglia Square development. The church's brick tower once terminated the view along Botolph Street, that connected Magdalen Street with St Augustine's Street. This street was destroyed in the development of Anglia Square and the prominence of the church as a townscape focus was eroded, being seen across the expanse of surface car parking when one emerges from the heart of Anglia Square, rather than a view framed by buildings. The church is set back from St Augustine's Street and

therefore does not feature in views south along that street, which are focused on and blocked by the bulk of Sovereign House.

453. The setting of the church to the east now features a busy road junction, extensive surface car parks on the part of the Anglia Square site that was never built, and the semi derelict forms of Sovereign House and the multi storey car park. Sovereign House can be seen as a tapering wedge of building above the roofline of the almshouses, with its blocky lift tower and profusion of telecommunications equipment adding an awkward extra form that draws attention. These features contribute to the feeling of detachment from the city's historic core.
454. Views 23 and 24 in the HTVIA help to assess the change to the setting of the heritage assets. The change to the setting of the church arising from the development will be significant, introducing larger scale buildings on the Pitt Street frontage that are visible beyond the church and 2-12 Gildencroft. The height of the closest block E and E/F would step up and down in six modulations between four and six storeys. Further south along Pitt Street, and therefore affecting the setting less is block F, which contains three modulations between four and seven storeys. All would be lower than Sovereign House but closer to these heritage assets than Sovereign House. The closeness makes the impact on setting greater. There is a gap in Pitt Street between block E/F and F formed by Tooley Lane.
455. The height parameter plans reproduced below enable a comparison to be made between the current scheme and the call-in scheme. It demonstrates the efforts made by the applicant and the local planning authority in modifying the scheme to reduce the degree of harm as required by step four in Historic England's "GPA3: The Setting of Heritage Assets". In the call-in scheme there was no break in the frontage and there were six height modulations overall rather than nine now. The height of the buildings directly on Pitt Street ranged from five to twelve storeys, with a twenty-storey tower strikingly prominent within the view from the churchyard and the setting of the buildings. Given the dramatic reduction in the scale and mass of building within the setting of these heritage assets it would follow that the assessment of impact and harm would be commensurately lower.

Call-in scheme



Current scheme



456. The table below compares the percentage of the Pitt Street frontage occupied by buildings of different heights in the call in and current schemes.

Storey height	Percentage of Pitt Street frontage	
	Call-in scheme (%)	Rev C Current Scheme (%)
Ground (Tooley Lane)	0	6
3	10	0
4	0	25
5	29	26
6	0	24
7	22	19
8	6	0
9	21	0
12	12	0

457. In the letter refusing to grant planning permission for the call-in scheme the Secretary of State's position was explained: "Given the height and bulk of the tower and Blocks E and F rising above the existing roofline of the almshouses, and given the tower would compete with and distract from an important view of the church tower, the Secretary of State considers that the harm caused here would be substantial (and in Framework terms, at the upper end of the 'less than substantial' scale)." The Secretary of State's position is a material consideration in relation to judgements of heritage impact in relation to the current scheme.
458. Historic England conclude in their 31 May 2022 comments on the original submission version of the current scheme that it would "cause a high level of harm to the significance of St. Augustine's Church." The reduction in height of block D from six to five storeys in the revision A submission did not alter this overall judgement. The moderation of their verdict on this aspect of the scheme from "severe harm" for the call-in scheme to "a high level of harm" for the current scheme does not sufficiently reflect the dramatic shrinkage of the proposed development by comparison with the call-in scheme or acknowledge that the benchmark judgements of the Secretary of State (harm at the upper end of less than substantial) and planning inspector (moderate harm) on the call-in scheme are a significant material consideration.
459. The current scheme will undoubtedly introduce buildings that are visible from within the churchyard of St Augustine's and offer some competition for attention that will detract from the appreciation St Augustine's Church and 2-12 Gildencroft and that is harmful to their significance.
460. The magnitude of change to the setting of the assets is a combination of the extent of the setting that is experiencing change and the degree of change within that portion of the setting. When considered in 360 degrees, between one quarter and one third of the buildings' settings are being changed and this change is from a mixture of gravel surfaced car parking, remnant roads and a rubble bund to a series of large-scale buildings inhabited by people and businesses. The existing tall buildings on the site that are prominent within the setting are further away than the proposed buildings would be. Therefore, most of the setting would not be

altered but the part that is would be strongly affected. The applicant's conclusion of a low magnitude of change therefore underplays the change and a conclusion of low-medium is more suitable. When combining this with a high degree of sensitivity for St Augustine's Church the result in a moderate-major effect. As a grade II listed building 2-12 Gildencroft is medium sensitivity and therefore the effect would be minor-moderate.

461. The assessment now turns to whether the change is beneficial or harmful. It is acknowledged that the new buildings will be clearly visible in the background to St Augustine's Church and 2-12 Gildencroft when viewed from within the churchyard and to a greater extent than Sovereign House. The scale and mass of the new development will sit incongruously besides the church (albeit to a much lesser extent than the call-in scheme), which undermines the historic pre-eminence of the tower in the area to a greater extent than the current buildings on the site. This also disrupts the significance derived by the church from its historic and aesthetic value as the asset forms a composition with 2-12 Gildencroft and the churchyard.
462. This harm needs to be balanced against the current semi-derelict condition of the site from which the assets are currently viewed from the east and forms part of its immediate setting. The development will set up a vista that focuses attention on St Augustine's Church tower from the east when walking along the new Botolph Street from Anglia Square or St George Gardens. This would celebrate the importance of the church as a landmark in this part of the city and it will form a much stronger part of the pedestrian experience of moving to and from the city centre and this will better reveal its heritage value. When combined with the removal of derelict buildings and surface car parking this will improve the setting in a way that largely offsets the harm arising from the visual presence of the substantial buildings that would be constructed. A conclusion of overall adverse effect would be harsh while a conclusion of neutral would slightly underplay the balance of benefit and harm. For St Augustine's Church and 2-12 Gildencroft, conclusions of neutral-adverse are reached. When combined with sensitivity and magnitude of change the residual effect for St Augustine's Church is moderate-major neutral-adverse and 2-12 Gildencroft is minor-moderate neutral-adverse. In the case of both heritage assets the degree of harm in NPPF terms would be towards the lower end of the less than substantial category
463. **Anglican Cathedral.** 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.
464. The applicant ascribed a sensitivity rating of high to the Anglican Cathedral because it is a grade I listed building. Table 1 on page 7 in the HTVIA methodology section describes very high sensitivity being accorded to assets of "recognized international importance". In paragraph 5.82 the Anglican Cathedral is described as "one of the great monuments of Romanesque and gothic art and architecture in Western Europe" meaning that it deserves a rating of very high.

465. The applicant ascribed a magnitude of change to the Anglican Cathedral of low. Given that the setting of the Anglican Cathedral is so large, and the development will be perceived as a peripheral element in relation to the Cathedral in views from high ground to the east and not perceived at all from the Cathedral Meadows, very little of the setting will be affected by the development.
466. View 7 (St James Hill) and view 8 (Ketts Heights) feature the Cathedral in relation to the proposed development from elevated vantage points to the east. 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 proposed development of Anglia Square will make very little difference to the view from these vantage points, constituting a small proportion of the overall field of view, peripheral to the natural focus on the landmark buildings.
467. The element of setting which is of some importance in contributing to significance that will be affected by the development is the view from the northern approach along Aylsham Road and St Augustine's Street. It is the height of block A that determines whether more or less of the cathedral can be seen. In the original submission it was proposed to be eight storeys, which led to it obscuring a portion of the tower in views 11, 12 and 37. This was remedied in the revision of the southern part of block A to seven storeys. While it is disappointing that no more of the building is revealed (as called for in 7.88 of the Anglia Square Policy Guidance note) the residual effect is now moderate neutral.
468. **Norwich Castle.** 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
469. The applicant explains the contribution of setting to the significance of the Castle primarily in terms of how it commanded the city from an elevated position for defensive and symbolic purposes. This also results in it having a very large geographical setting. Therefore, it seems inconsistent for them to conclude that the development causes a medium magnitude of change when, although clearly visible, it would sit comfortably below the skyline. It also seems inconsistent with the lower level of change ascribed to buildings closer to the site such as St Saviour's Church. A more appropriate level would be low-medium leading to a residual effect of moderate neutral.
470. **City Hall.** The applicant has not provided an assessment of the operational effect of the development on City Hall as an individual building separate from its grouping as a city landmark. Its role on the skyline and relationship with the development is similar to the Roman Catholic Cathedral and therefore the same assessment with a conclusion of moderate neutral would be appropriate.

471. **City Walls.** The city wall was built in the fourteen century and is a scheduled monument. The section on Magpie Road was revealed a few years ago 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. The applicant correctly identifies that the only section of City Wall that would be affected is that on Magpie Road and that the development would be marginal to the perception and appreciation of that section of wall. It is therefore surprising and extreme for the magnitude of change to be given as medium and it should be reduced to low resulting in a residual effect of moderate neutral.
472. **Waterloo Park.** The applicant has not provided a written assessment of the operational effect of the development on Waterloo Park, although the discussion in relation to view 36 gives an indication of their thinking. Waterloo Park, and especially the roof terrace on the listed pavilion building from which view 36 was obtained, is in an elevated position affording views over the city to the south that are heavily filtered through trees on the southern edge of the park. The obscured nature of the view, the limited change to the skyline and the fact that the design of the park with its edge screening and hedging rooms promotes an inward focus, leads to a conclusion of negligible rather than the low change to the significance of the asset ascribed by the applicant. In terms of the quality of the change, the benefit derived from the removal of the ungainly water tower on Sovereign House and lift towers on the multi-storey car park will be negated by the development appearing as a strip of building slightly above the current level of the skyline reducing the sense of the city as made up of a texture of many built components. The residual effect is therefore considered to be minor neutral rather than moderate beneficial as proposed by the applicant.
473. **Northern City Group and Anglia Square Group.** The Northern City Group is a set of listed buildings on St Augustine's Street (note that 2-12 Gildencroft was treated separately from rev A onwards) and the Anglia Square Group is a set of listed buildings on Magdalen Street north of the flyover. The Council agrees with the applicant that the Anglia Square Group (Magdalen Street north) will experience a moderate beneficial effect from the development because buildings that are universally recognized as being of low architectural quality between Anne's Walk and the flyover will all be replaced by new buildings of much higher quality. This is illustrated in views 25 (outside 107 Magdalen Street) and view 31 (corner of 59 Magdalen Street). Historic England assert that harm will be caused to the significance of listed buildings on Magdalen Street, however this is at odds with their complimentary remarks about the frontage of block K. It appears that their dislike of the architectural treatment of the Stump Cross building has obscured the benefit that they ought to acknowledge in relation to the setting of the listed buildings in the northern part of Magdalen Street. SAVE Britain's Heritage offer no specific assessment of the effect of the scheme on Magdalen Street, perhaps because acknowledging its merits would dilute its determination to offer a trenchantly critical message overall. In relation to the Northern City Group / St Augustine's Street, the Council agrees with the applicant's judgement that the scheme is capable of having a beneficial effect for the reasons they cite but the high visibility of buildings in the outline portion of the scheme means that the

Council considers the magnitude of change to be greater than the applicant and their judgement that the scheme will have a positive effect cannot be fully substantiated until the architectural treatment of the outline scheme is known. A minor-moderate neutral effect is therefore currently offered.

474. **Doughty's Hospital.** 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.
475. Doughty's Hospital lies to the south of the development separated from it by St Crispin's Road. The principal buildings are arranged symmetrically around a courtyard space. The buildings are two stories with a continuous roofline giving it a horizontal emphasis punctuated by tall chimneys. The intimacy and separateness of the space is currently markedly harmed by the presence of Gildengate House as a linear slab rising behind Doughty's. This harm is increased by the oversailing lift core at the east end of the building which conflicts with the symmetry of Doughty's. The new buildings on Anglia Square will also be very visible within the view and different in orientation and character leading to a medium level of change. The two taller elements of block J will run perpendicular to St Crispins Road and the north wing of Doughty's, which will be more complementary to the setting of the listed building and potentially draw the eye away from the intimacy of the courtyard less. While this part of the development is still in outline and with the potential for bolt on balconies to be prominent it is prudent to offer a conclusion that the residual effect will be moderately neutral.
476. Historic England conclude that "The new development would still rise above the two-storey building, resulting in a measure of harm." It is not clear whether Historic England are attributing harm due to what they perceive to be a worsening of the existing harm or the continuation of it. We consider there to be no harm to the significance of Doughty's in the sense that the proposed buildings are no worse than those currently seen in the setting of the building, and possibly better. This has been achieved by following step 4 in Historic England's GPA3: The Setting of Heritage Assets that requires the applicant to explore the way to maximise enhancement and avoid or minimise harm. The iterations of the scheme have progressively and deliberately improved the relationship with Doughty's. The call-in scheme featured a cluster of primary building elements ranging from 8-10 storeys that were highly visible from Doughty's courtyard to a greater extent than Gildengate House and lacking the sympathetic symmetry that is sought. By the submission scheme this had dropped to buildings ranging from 4-8 storeys. Historic England's position on the current scheme disregards the benchmark judgements on the call-in scheme of the Secretary of State (whose letter failed to mention the impact on Doughty's Hospital) and the planning inspector, who found minor harm.
477. **43-45 Pitt Street.** 43-45 Pitt Street are locally listed building that are identified as making a positive contribution to the City Centre Conservation Area. Their significance is derived from their architectural and historic interest. 43-45 Pitt Street was constructed in the late 19th century and number 43 has a former pub frontage. They are part of a group of buildings in the south-west corner of the site that pre-date the development of Anglia Square. They feature attractive architectural features such as the stucco surround to the former pub windows and

corner door, moulded brick cornice projections over other doors, a dentil eaves cornice and sash windows. These non-designated heritage assets would experience substantial harm due to the total loss of their significance and built fabric through demolition. This would also result in less than substantial harm (at the lowest possible level) to the City Centre Conservation Area due to the loss of the positive contribution they make to its character and appearance. This harm would be outweighed by the various benefits to the conservation areas derived from other aspects of the development that are described elsewhere in this report.

478. The loss of these buildings has been accepted as a necessary precursor to a viable redevelopment of the site that fulfils its potential in all permutations of development proposed in recent years, including unimplemented schemes that received planning permission. The Planning Inspector accepted the benefits of the call-in scheme would outweigh the harm caused by the total loss of significance of these building.
479. Policy DM9 indicates that the loss of locally identified heritage assets will only be acceptable where: a) there are demonstrable and overriding benefits associated with the development; and b) it can be demonstrated that there would be no reasonably practicable or viable means of retaining the asset within a development.
480. The erection of two new buildings facing Pitt Street as part of block F require the removal of these existing buildings because they are on the same footprint. These new buildings will provide around 123 homes and 306sqm commercial floorspace, which is a considerable planning benefit. The omission of this part of the site from the wider development would adversely impact viability and the prospects of delivery of the scheme as a whole. No alternative area within the development could accommodate these units without unacceptable harm to the surrounding historic environment and / or a poor design outcome. The two parts of the test in DM9 are therefore met.
481. There is a former stables / warehouse building to the rear of 47-51 Pitt Street that would also be demolished and its significance totally lost to facilitate the redevelopment of Anglia Square. In early summer 2022, following the original planning submission, some concerned individuals and organisations campaigned to have the building listed because they thought it contained extant standing remains of the Church of St Olave that once stood on the site. Following a formal application for listing, Historic England considered whether this building met the criteria for listing and decided that it did not. Their report of 1 July 2022 gave the following reasons for their decision:

“Architectural interest:

- *The building does not display high quality craftsmanship in its construction;*
- *It is not a rare or innovative building type;*
- *The structure has been altered over time so that it lacks internal features and an overall degree of survival.*

Historic interest:

- *The presence of reused materials in the walls of the building is not unusual and does not outweigh the common nature of the building type;*
- *Beyond the reuse of building materials the structure does not appear to bear any relationship with the former church building associated with the site."*

482. DM9 has a policy element on how to deal with other heritage assets that are identified during the process of decision making on applications: *"Where heritage assets newly identified through this process are demonstrated to have local significance, development proposals affecting them will be determined in accordance with the criteria for existing locally identified assets as set out in this policy."* The building undoubtedly has some heritage value. It is a borderline case in terms of its eligibility for local listing due to some uncertainty over the exact chronology of its development. However, the question of whether it is worthy of locally listed status is not of decisive importance because the same reasoning would apply as to 43/45 Pitt Street in considering compliance with DM9 in terms of the justification for demolition.
483. The phasing strategy envisages a gap between the demolition of these buildings in phase one and the erection of the replacement buildings in phase four. This creates a risk that the buildings may be lost and the benefits that justify their loss not secured. It is understood that sufficient time would be needed for a thorough archaeological investigation of this part of the site following demolition. Furthermore, a condition is proposed by the Council's archeological advisor that would require the historic building recording and the controlled and supervised dismantling of the former stable / warehouse building to the rear of 47-51 Pitt Street. DM9 expects a legally binding commitment to be obtained from the developer to implement a viable scheme before any works affecting the asset (such as demolition) are carried out and the proposed phasing would not enable this to be secured. Phase 1 demolition of buildings on Pitt Street is less than ideal, bringing forward sooner in the programme the disruption of this street frontage and the displacement of tenants from these premises. However, the applicant has indicated that given the level of archaeological investigation that is likely to be required in this sector of the site, demolition needs to be undertaken in phase 1 to de-risk future delay in the build programme and to allow HIF grant to support the cost of these works. These considerations are material and justify departing from DM9 on this point.
484. **Norwich City Centre Conservation Area.** Norwich is a city with an immense wealth of characterful and important heritage assets. Its defining characteristics are captured well in Historic England's response to the call-in scheme: *"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.”

485. In the applicant's otherwise sound methodology, conservation areas are ascribed a medium sensitivity rating, equivalent to a grade II listed building. However, this does not acknowledge the variability of townscape quality, size and density of individual heritage assets within a conservation area. Norwich City Centre Conservation Area is universally acknowledged as one of the greatest places of urban historic interest in the country and therefore it should be given a sensitivity rating of at least high.
486. 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 beneficial change. These are the policies and an assessment of the extent to which they are fulfilled:
- **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 and is a considerable benefit to the conservation area. The proposed Botolph Street closely follows the alignment of its predecessor connecting Magdalen Street with St Augustine's Street and the extension to St George's Street closely follows its predecessor but enhances the connectivity over historical precedent by intersecting with Edward Street. The location of Stump Cross at the bifurcation point of Magdalen Street and Botolph Street will be celebrated through the close reinstatement of Botolph Street and the bold design of the southern façade of block L. Block B will echo the former footprint of Rose Yard.
 - **Remove negative landmarks, such as Sovereign House and Gildengate House (C1).** This is achieved through the demolition of Sovereign House and 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.
 - **Preserve and enhance views of citywide and local landmarks (C2). 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).** The tower of St Augustine's Church is a local landmark that will be celebrated in the restored alignment of Botolph Street. Views of citywide landmarks are preserved but not enhanced or opened-up.
 - **Appropriate scale of new buildings (D2) – In areas of low significance (such as Anglia Square) the prevailing scale of existing traditional buildings should be respected but the careful siting of taller buildings**

and use of larger scaled buildings in appropriate locations will be encouraged, provided they do not negatively impact on important views of citywide and local landmarks or affect the setting of listed buildings. The proposals have been informed by a detailed study of the historic context of the area, which has enabled the taller and larger scaled building to be appropriately located in a way that is consistent with the qualified encouragement for such buildings in this management policy. The scheme minimizes the potential for jarring relationships with neighbouring streets and buildings through more modestly scaled buildings on the site edges. However, some harm to the significance of St Augustine's Church and 2-12 Gildencroft has been found though the effect on their setting.

- **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 is combined with slightly moving back the building line, thereby respecting the existing scale of buildings on Magdalen Street, which are predominantly three storeys in the narrow sections. It would also replace the visually poor building that currently occupies this part of the street.
- **Large-scale buildings appropriate near the ring road (Anglia Square character area M&E2).** This permissive policy was relied on when developing the call-in scheme but ultimately not supported by the Secretary of State whose letter said *"the bulk and massing of the built form proposed is not sympathetic to its context. In particular, he is concerned that the frontage to St Crispins Road would include 8, 10 and 12 storey buildings ..."*. The current scheme therefore features buildings that range between four and eight stories, with the tallest element set well-back from the road.
- **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 called St George's Gardens would be provided.

Conclusion – Impact on built heritage receptors

487. It is clearly a material consideration to consider the judgement made by the Secretary of State and the Planning Inspector in relation to the previous scheme that was the subject of a public inquiry (18/00330/F) (the call-in scheme) considering the changes made for the current scheme, most notably the absence of a 20-storey tower and removal of three bulky blocks, being replaced by several blocks with an undulating storey height and a finer street pattern. This is something that Historic England and (to an even greater extent) SAVE have failed to do when asserting that heritage assets will be harmed in the current scheme to a greater extent than the secretary of state and planning inspector found the call-in scheme would have harmed them. Examples are Doughty's Hospital, buildings on Magdalen Street, St Augustine's Street and the city centre conservation area as a whole. The table below compares the degree of harm and extent of the benefit to heritage assets found by the council in relation to the call-in scheme and the current scheme with the conclusions of the Secretary of State and Planning

Inspector for the call-in scheme. In almost every case the degree of harm is less, harm has been switched to benefit or there is no effect on the asset.

Asset (LB grade)	Call-in scheme			Current scheme effect / (harm to significance)
	Secretary of State	Planning Inspector	Council	Council
Anglican Cathedral (Grade I)	Minor harm ¹	Minor harm ¹	Moderate harm	Moderate neutral No harm
St Helen's Church (Grade I)	Minor harm	Minor harm ¹	Minor harm	No effect No harm
St Andrew's Church (Grade I)	Minor harm	Minor harm	Minor harm	No effect No harm
St Clement's Church (Grade I)	Minor harm	Minor harm	Major harm	Moderate neutral No harm
St George's Colegate Church (Grade I)	Not mentioned	Minor harm	Minor harm ²	Moderate neutral No overall harm
St Augustine's Church (Grade I)	Harm at upper end of less than substantial	Moderate harm	Minor harm	Moderate-major neutral-adverse Lower end of less than substantial harm
Norwich Castle (Grade I, scheduled monument)	No harm	No harm	Minor harm	Moderate neutral No overall harm
St Peter Mancroft Church (Grade I)	No harm	No harm	Negligible harm	No effect No harm
The Guildhall (Grade I)	Not mentioned	No harm	Minor harm	No effect No harm
St Andrews and Blackfriars Halls (Grade I, scheduled monument)	Not mentioned	No harm	Minor harm	No effect No harm
St Peter Hungate church (Grade I)	Not mentioned	No harm	Negligible harm	No effect No harm
St Martin at Oak Church (Grade I)	Not mentioned	Not harmful	Minor harm	Moderate neutral No harm
St Mary's Church (Grade I)	Not mentioned	Very limited and not harmful	Negligible harm	Moderate neutral No harm

Asset (LB grade)	Call-in scheme			Current scheme effect / (harm to significance)
	Secretary of State	Planning Inspector	Council	Council
St Saviour's Church (Grade I)	Neutral	Neutral	Negligible benefit	Moderate beneficial No harm
RC Cathedral (Grade I)	No harm	No harm to ability to appreciate conservation area in distant views	Moderate harm	No effect No harm
St James Church (Grade I)	Not mentioned	No impact on ability to experience asset	Negligible benefit	Moderate beneficial No harm
City Wall (scheduled monument)	No effect	No effect	Minor harm	Moderate neutral No harm
Bacon's House (Grade II*)	Not mentioned	Minor harm	Not individually mentioned	Moderate neutral No harm
City Hall (Grade II*)	No harm	No harm	Minor harm	Moderate neutral No harm
Britons Arms (Grade II*)	Not mentioned	No harm	Negligible harm	No effect No harm
Pykerell's House (Grade II*)	Not mentioned	Not mentioned	Negligible harm	No effect No harm
71 Botolph Street (Grade II*)	Not individually mentioned	Not individually mentioned	Not individually mentioned	Moderate beneficial No harm
31-35 Magdalen Street and Gurney Court (Grade II*)	Not individually mentioned	Not individually mentioned	Not individually mentioned	Minor beneficial No harm
45-51 London Street (Grade II)	Minor harm	Minor harm	Moderate harm	No effect No harm
Doughty's Hospital (Grade II)	Not mentioned	Minor harm	Minor harm	Moderate neutral No harm
2-12 Gildencroft (Grade II)	Harm at upper end of less than substantial	Moderate harm	Minor harm	Minor-moderate neutral-adverse Lower end of less than substantial harm
1 Guildhall Hill (Grade II)	Not mentioned	No harm	Minor harm	No effect No harm

Asset (LB grade)	Call-in scheme			Current scheme effect / (harm to significance)
	Secretary of State	Planning Inspector	Council	Council
Maids Head Hotel (Grade II)	Not mentioned	Not materially detract from the asset	Minor harm	No effect No harm
47-49 St Martin's Lane (Grade II)	Not mentioned	Not harmful	Moderate harm	No effect No harm
Fye Bridge Street group	Minor harm	Minor harm	Major harm	No effect No harm
Wensum Street group	Minor harm	Minor harm	Major harm	No effect No harm
St Augustine's Street group ³	Minor harm	Minor harm	Major harm	Minor-moderate neutral No harm
Magdalen Street group ⁴	Some enhancement of setting	Some enhancement of setting	Major benefit	Moderate beneficial No harm
Upper Close group	Not mentioned	No effect	Negligible harm	No effect No harm
43-45 Pitt Street (Local listing)	Not mentioned	Total loss	Total loss	Total loss
Waterloo Park (RHPG II*)	No harm	No harm	Minor harm	Minor neutral No harm
City centre conservation area	Broadly neutral	Benefit	Minor-moderate harm	Moderate beneficial No harm

¹ As seen from Cathedral Meadow

² As part of a group.

³ Similar category to "Northern City group" in analysis of current scheme but included buildings to the south of Anglia Square in call-in scheme assessment.

⁴ Similar category to "Anglia Square group" in analysis of current scheme

Operational effects on townscape receptors

Townscape receptor	Sensitivity	Magnitude of change	Impact: Harmful / Neutral / Beneficial	Residual Effect
Low Density Residential	Low	Low	Beneficial	Negligible Applicant: Minor Beneficial
Northern City	Medium-Low	Medium	Beneficial	Minor-Moderate Beneficial Applicant: Minor Beneficial
Anglia Square	Low	High	Beneficial	Moderate Beneficial
Colegate	Medium-High	Low	Neutral Applicant: Beneficial	Minor Neutral Applicant: Minor Beneficial

Townscape receptor	Sensitivity	Magnitude of change	Impact: Harmful / Neutral / Beneficial	Residual Effect
Northern Riverside	Medium	Low	Beneficial	Minor Beneficial
Elm Hill & Maddermarket	Medium High	Negligible	Neutral	Negligible Neutral
Civic	Medium High	Negligible	Neutral	Negligible Neutral
Cathedral Close	High	Nil	Nil	Nil

488. There is a discrepancy in the level of sensitivity accorded by the applicant to three townscape character areas between the text in section 8 of the HTVIA and the summary table in section 10. The low-density residential area is deemed medium sensitivity in the text and medium-low in the summary; northern city is deemed medium in the text and low in the summary; and Colegate is deemed high in the text and medium in the summary.
489. The applicant has explained the sensitivity ascribed to the low-density residential townscape character area in paragraph 8.113 of the HTVIA: *“The area, is judged to be medium sensitivity, owing to the mostly consistent low rise terraced and semi-detached residential character and concentration of Grade-II listed buildings and conservation areas.”* However, there appears to be a degree of confusion here that points to a lower rating of sensitivity being appropriate. The reference to *“a concentration of Grade-II listed buildings and conservation areas”* is not correct because the only designated heritage assets are in the far north of the area around the junction of Magdalen Road and Denmark Road where a small part of the Sewell conservation area overlaps, and one finds a group of Grade II listed properties at 135-145 Elm Terrace on Magdalen Road and the Grade II listed Christ Church. Also, the level of sensitivity is higher than that given to the northern city character area that is within the City Centre Conservation Area and contains many listed buildings, albeit it has a less homogenous character than the low-density residential character area. It is also worth noting that “low density residential” is a misnomer because the density in residential households is higher here than in any other part of Norwich even though the buildings are comparatively low scale. These factors lead to a conclusion that the sensitivity for the low-density residential area should be low with a negligible rather than minor beneficial effect and the sensitivity for the northern city area should be medium-low with an effect that is minor-moderate beneficial rather than minor beneficial.
490. In relation to Colegate, a sensitivity rating of medium-high would be more appropriate. This is mid-way between the two discrepant levels ascribed by the applicant and balances the very fine, coherent and distinctive townscape character within Colegate itself with the more fragmentary character of some of the backland areas nearby occupied by surface car parks. In combination with a low magnitude of change this results in minor/moderate effect. The applicant has forecast a beneficial effect but the outline nature of this part of the planning application suggests a cautious neutral judgement should be applied until the submission of architectural details allows the real effect to be determined.

Operational effects on visual receptors

Visual Receptor (View number)	Sensitivity	Magnitude of Change	Impact	Significance and Nature of Residual Effects*
1 Constitution Hill	Low	Nil	Neutral	Nil
2 Constitution Hill / Denmark Rd / St Clement's Hill	Low	Negligible	Neutral	Negligible
3 Angel Rd	Low	Low	Neutral	Minor Neutral Applicant: Negligible Call-in scheme: Moderate Neutral
4 Heath Rd / Shipstone Rd	Low	Medium	Beneficial	Minor Beneficial
5 Magdalen Rd / Sprowston Rd	Low	Low	Neutral	Low Neutral Applicant: Negligible
6 Mousehold Ave	Medium	Medium	Beneficial	Moderate Beneficial Call-in scheme: Moderate Neutral
7 St James' Hill	High	Low Applicant: Medium	Neutral Applicant: Beneficial	Moderate Neutral Applicant: Major Beneficial Call-in scheme: Moderate Adverse
8 Kett's Heights	High	Low Applicant: Medium	Neutral Applicant: Beneficial	Moderate Neutral Applicant: Major Beneficial Call-in scheme: Moderate Neutral
9 Kett's Hill	Low	Medium	Beneficial	Minor Beneficial Call-in scheme: Minor Adverse
10 Castle Rampart	High	Medium	Beneficial	Major Beneficial Call-in scheme: Major Adverse
11 Aylsham Rd (west path)	Medium	Medium	Neutral	Moderate Neutral
12 St Augustine's St / Magpie Rd	Medium	Medium	Neutral Applicant: Beneficial	Moderate Neutral Applicant: Moderate Beneficial Call-in scheme: Moderate Adverse
13 St Augustine's St / Sussex St	Medium	Medium	Beneficial	Moderate Beneficial Call-in scheme: Major Adverse
14 Magpie Rd	Medium	Low	Beneficial	Minor Beneficial Call-in scheme: Major Neutral
15 Edward St / Magpie Rd	Low	High	Beneficial	Moderate Beneficial
16 St James' Church	Low / Medium	Medium	Beneficial	Minor Beneficial Call-in scheme: Moderate Beneficial
17 Tombland	High	Negligible Applicant: Low	NA Applicant: Beneficial	Negligible Applicant: Moderate Beneficial

Visual Receptor (View number)	Sensitivity	Magnitude of Change	Impact	Significance and Nature of Residual Effects*
18 Wensum St / Elm Hill	Medium	Nil	Neutral	Nil Call-in scheme: Major Adverse
19 Magdalen St (south of St Clement's Church)	Medium	Low	Beneficial	Minor Beneficial
20 Oak St / St Martin's Lane	Medium	Low Applicant: Medium	Neutral Applicant: Beneficial	Minor Neutral Applicant: Moderate Beneficial Call-in scheme: Moderate Adverse
21 St Crispin's Rd / Oak Street	Low	Medium	Beneficial	Minor Beneficial Call-in scheme: Moderate Beneficial
22 Quaker burial ground	Low	Low	Beneficial	Negligible Beneficial Call-in scheme: Moderate Neutral
23 St Augustine's Church porch	Low-Medium	High	Neutral	Major Neutral
24 North east cnr St Augustine's Churchyard	High	Low-Medium Applicant: Medium	Neutral-Adverse Applicant: Neutral	Moderate-Major Neutral-Adverse Applicant: Major Neutral Call-in scheme: Major Neutral
25 o/s 107 Magdalen St	Low	Medium-High	Beneficial	Minor-Moderate Beneficial Call-in scheme: Major Beneficial
26 Cowgate / Bull Close	Low	Medium	Neutral Applicant: Beneficial	Minor Beneficial Call-in scheme: Moderate Adverse
27 St George's St	Medium Applicant: High-Medium	Low	Neutral Applicant: Beneficial	Minor Neutral Applicant: Moderate-Minor Beneficial
28 Calvert St	Medium	Negligible-Low	Beneficial	Minor-Negligible Beneficial
29 o/s 25 Magdalen Street	Medium Applicant: Low-Medium	Low	Beneficial	Minor Beneficial
30 o/s 39 Magdalen St	Medium Applicant: Low	Medium	Beneficial	Moderate Beneficial Applicant: Minor Beneficial
31 Cnr 59 Magdalen St	Low	High	Beneficial	Moderate Beneficial
32 Doughty's Hospital	Medium	High	Neutral Beneficial	Major Neutral Applicant: Major Beneficial Call-in scheme: Moderate Neutral
33 St George's St / St Crispin's Rd	Low	High	Beneficial	Moderate Beneficial
34 St Mary's Plain / Duke St	Medium	Low	Beneficial	Minor Beneficial

Visual Receptor (View number)	Sensitivity	Magnitude of Change	Impact	Significance and Nature of Residual Effects*
35 St Crispin's roundabout	Low	High	Neutral Applicant: Beneficial	Moderate Neutral Applicant: Moderate Beneficial
36 Waterloo Park	High	Low	Neutral	Moderate Neutral
37 Aylsham Rd (middle of road)	Medium Applicant: Low	Medium	Neutral Applicant: Beneficial	Moderate Neutral Applicant: Minor Beneficial Call-in scheme: Major Adverse
38 Rosemary Lane	Medium	Nil	Neutral	Nil Call-in scheme: Moderate Adverse
39 Castle battlements	Medium	Medium	Beneficial	Moderate Beneficial Call-in scheme: Major Neutral
40 Cathedral Meadow	High	Nil	Neutral	Nil Call-in scheme: Moderate Adverse

* The reference to call-in scheme in the table refers to the LPA judgement on the effect of the call-in scheme on the same views.

491. **View 7 – Motram Monument, St James Hill.** The assessment of this view by the applicant asserts that an improved architectural quality of the new scheme will be a benefit compared to the current scheme in terms of the varied materiality and roof form and how the roofs on the right-hand side of the development will “pleasingly reflect the rows of long pitched roof terraces further north”. The image supplied does not support this conclusion, perhaps due to the limitations of a rendered view at long range. It also seems unlikely that a development entirely composed of different coloured brick could qualify as displaying varied materiality. It is therefore more appropriate to consider the effect on this important visual receptor and visitors to the location as major neutral rather than major beneficial.
492. **View 8 – Kett’s Heights.** It is not evident from the image provided that the development would necessarily result in a beneficial effect or a negative effect at this long-range and with the development sitting comfortably below the skyline. An effect of major neutral rather than major beneficial is considered appropriate.
493. **View 12 – Junc St Augustine’s Street / Magpie Road.** The development will very slightly obscure part of the Anglican Cathedral spire in this view. The detriment arising from this will be offset by the removal of the jarring water tower on the top of Sovereign House from view along with the introduction of buildings that lead the eye towards the reinstated entrance to Botolph Street, albeit with the buildings appearing to squeeze the entrance and appear less clear and inviting from this distance. A conclusion of moderate neutral is therefore considered to be more appropriate than moderate beneficial.
494. **View 15 – Junc Edward Street / Magpie Road.** In this view the buildings currently on the site share a roof line and a strong horizontal emphasis. This creates a monolithic edifice relieved only by the lumpy extrusion on the roof of each building and the different material treatments. In certain lights (such as the one captured in the existing image within the HTVIA) Sovereign House can appear sleek but this effect is increasingly undermined by its progressive

deterioration. The unbuilt west and north portions of the site are glimpsed in this view. The alterations to the massing of blocks A and D have moderated the abrupt density transition that results from the juxtaposition of the empty land in the foreground and the proposed development beyond. The proposed building provides a variety of forms and brick tones and textures and fills the unbuilt sections of the site, which is an enhancement on the existing and the call-in scheme leading to agreement with the applicant that this view is moderate beneficial.

495. **View 17 – Tombland.** The applicant says that the scheme “will be barely discernable to the viewer” from viewpoint 17 and HTVIA methodology defines negligible as “a minimal amount of change” so negligible should be applied here not low, leading to negligible effect rather than moderate beneficial.
496. **View 20 – Junc Oak Street / St Martin’s Lane.** The alteration to the view here occupies a small component of the view in the far distance and therefore a low magnitude of change seems more appropriate than medium. The beneficial effect ascribed to the scheme from a sensitive stepping up from foreground to background rooftops and the removal of the water tower on Sovereign House from the view are premature in the absence of architectural information that would be provided with a reserved matters application. An effect of minor neutral is therefore considered more appropriate than moderate beneficial.
497. **Views 23– St Augustine’s Church porch.** The applicants reasoning and conclusion that the effect of the development in view 23 (outside the church porch) is major neutral is supported following the reduction in height of block D from six to five storeys since the original submission.
498. **View 24 – St Augustine’s churchyard.** The applicant indicates that the quality of architecture of blocks E and F will redeem the intrusion of new buildings exceeding the height and prominence of Sovereign House resulting in a neutral effect but until architectural information is received for these blocks through a subsequent reserved matters submission it is prudent to exercise caution and a neutral-adverse judgement is selected. Furthermore, it appears that the change of part of the roof form from pitched to flat roof between the original submission and revision A may make the job of integration more difficult, as suggested by Historic England in their comments of 11 August 2022. A low-medium magnitude of change (rather than medium) is considered appropriate, given the modest component of the view that the new building would occupy and the fact that Sovereign House is already visible and occupies part of this visual area. Therefore, a moderate-major neutral-adverse effect is considered to arise in relation to the visual receptor at view 24.
499. **View 26 – Junc Cowgate / Bull Close.** An enhancement of the view is claimed due to sensitive residential design and varied roof forms. The minor amendments to east elevation of block M in revision A did increase the ratio of fenestration to blank surfaces tipping it from neutral to a positive change by comparison with the monolithic view of the derelict multi-storey car park.
500. **View 27 – St George’s Street.** The sensitivity of this view is overstated given that the buildings are mostly modern and ordinary, and the conservation area status has not been considered an attribute that should elevate the view sensitivity elsewhere e.g., on Magdalen Street at the junction with Edward Street. A medium

sensitively would be more appropriate. It is unclear why a beneficial effect is being claimed given that no negative building on the site is being removed from the view and in the absence of any architectural information about the new scheme. Therefore, a neutral effect should be shown at this stage. This leads to an effect on the view that is minor neutral.

501. **View 30 – Outside 39 Magdalen Street.** The sensitivity of the view is erroneously rated by the applicant as low on the basis that “there are no other visible heritage assets here” apart from the conservation area. This is incorrect because both buildings that fill the view on the west side of Magdalen Street are listed. A rating of medium should therefore be applied leading to an effect on the view of moderate beneficial.
502. **View 32 – Doughty’s Hospital.** The same reasoning as explained in paragraphs 473-475 applies here.
503. **View 35 – Duke Street roundabout.** It is premature to conclude that the result will be beneficial in the absence of any architectural information, the loss of both 43/45 Pitt Street and the dynamic helical stair tower on Sovereign House and the retention of the blank Surrey Chapel building. Therefore, at this stage a neutral rating should be given.
504. **View 37 – Aylsham Road (additional view).** This view is experienced by thousands of bus passengers and motorists a day when they crest the ridge on Aylsham Road and begin their descent into Norwich. It is the first view of the Anglican Cathedral on this major approach to the city and it announces ones’ arrival, as it has done for centuries. While the immediate townscape may not be especially sensitive it is the reveal of the Cathedral that makes it sensitive. Therefore at least medium sensitivity should be given rather than low. This view is currently seriously harmed by the bulk of Sovereign House at the centre of the view and the Anglia Square Policy Guidance Note in paragraph 7.88 seeks a form of development that will reveal more of the Cathedral. The original submission would have had a harmful effect by obscuring part of the Cathedral, but the reduction in height of part of block A from eight storeys to seven since the original submission avoids this and results in a neutral effect.
505. Although the evaluation of effect here is notably less positive than the applicant in relation to several view receptors, overall and on balance the effect will still be beneficial. The most significant enhancements are likely to be enjoyed at Mousehold Avenue (view 6), the Castle Ramparts (view 10), the junction of St Augustine’s Street and Sussex Street (view 13), the junction of Edward Street and Magpie Road (view 15), outside 39 Magdalen Street (view 30), at the corner of 59 Magdalen Street (view 31), at the junction of St George’s Street and St Crispin’s Road (view 33) and the from the battlements of Norwich Castle (view 39).
506. A small number of visual receptors that would experience worse visual effects than under the call-in scheme:
 - View 16 – Outside St James church
 - View 21 – Junction St Cripsins Road / Oak Street

- View 24 – Seating area in north-west corner of St Augustine’s church yard (only a slight worsening due to a precautionary approach in the absence of architectural detail)
- View 25 – Outside 107 Magdalen Street

507. Far more visual receptors will experience no effects or better effects compared with the call-in scheme:

- View 3 – Angel Road
- View 6 – Mousehold Avenue
- View 7 – St James’ Hill
- View 9 – Kett’s Hill
- View 10 – Castle Rampart
- View 12 – St Augustine’s Street / Magpie Road
- View 13 – St Augustine’s Street / Sussex Street
- View 14 – Magpie Road
- View 18 – Wensum Street / Elm Hill
- View 20 – Oak Street / St Martin’s Lane
- View 22 – Quaker Burial Ground
- View 26 – Cowgate / Bull Close
- View 37 – Aylsham Road (middle of the road)
- View 38 – Rosemary Lane
- View 39 – Castle Battlements
- View 40 – Cathedral Meadow

508. In the preceding analysis harm to the significance of two heritage assets due to change to their setting has been identified (at the lower end of the spectrum of less than substantial) – St Augustine’s Church, and 2-12 Gildencroft. This needs to be given great weight in the decision, especially in relation to St Augustine’s Church with its grade I status. The total loss of significance and built fabric and through demolition of the non-designated assets 43/45 Pitt Street and the warehouse to the rear of 47-51 Pitt Street will also arise causing substantial harm to those assets.

509. Set against this harm, and significantly outweighing it, are benefits to the historic environment. The following listed buildings benefit: 71 Botolph Street, Former Church of St Saviour, 31-35 Magdalen Street and Gurney Court, Former Church of St James, Colegate Group and the Anglia Square Group. It is acknowledged

that the buildings proposed are generally of a larger scale than those that characterise the conservation area generally. This is in part a response to viability considerations and a desire to optimize the quantity of accommodation in this highly sustainable location, but also reflects the more heterogeneous nature of the Anglia Square character area and its recent history as a place of bold architecture that elicits affection from many people who live and work in the area.

510. Several aspects of the development mean that even with this scale and density of buildings the City Centre Conservation Area benefits overall through the:

- Removal of buildings of poor architectural quality that are identified as negative in the conservation area appraisal, many of which are empty and becoming increasingly visually derelict.
- Reinstatement of Botolph Street linking Magdalen Street with St Augustine's Street, close to its former alignment.
- Using the alignment of Botolph Street to create a new vista focused on the tower of St Augustine's Church, which heightens its presence as a historic landmark within the area.
- Extension of St George's Street providing a north-south pedestrian and cycle link including reducing the vehicular dominance of the entrance from St Crispin's Road.
- Celebration of Stump Cross through a reconfigured space fronted by new buildings of a higher architectural quality.
- Creating a higher quality new frontage on Magdalen Street.
- Disconnecting Anglia Square from the flyover by demolishing the Upper Green Lane bridge.
- Retaining, enlarging and enhancing the Anglia Square public space.
- Planting trees and other vegetation across the site.

Design quality evaluation

Introduction

511. The NPPF says in paragraph 126 that *"The creation of high quality, beautiful and sustainable buildings is fundamental to what the planning and development process should achieve."* Paragraph 134 says *"Development that is not well designed should be refused, especially where it fails to reflect local design policies and government guidance on design"*.

512. References to *"beauty"* are still quite new in government planning policy, having been introduced into the NPPF in July 2021. There is no definition of beauty in the glossary to the NPPF. The Oxford English Dictionary definition is: *"A combination of qualities, such as shape, colour, or form, that pleases the aesthetic senses, especially the sight"*. This implies that beauty elicits a positive emotional response, but this can be subject to a considerable amount of subjectivity. Beauty is treated as a component of well-designed places in the NPPF and a place can be

considered well-designed in planning policy terms if it meets relevant design policies and has been assessed using processes that are endorsed by government. This assessment is structured around the government's framework for design evaluation as expressed in the National Design Guide and National Model Design Code. They relate well to criteria within Building for a Healthy Life (also endorsed in the NPPF) and the design policies in our Development Management Policies Plan, especially DM3. These relationships are shown in the table below.

513. The government recommends the use of independent design review panels. An exceptionally thorough design review process was taken for Anglia Square though which the scheme was reviewed on four occasions during the pre-application process by the Design South East panel (DRP1 02.11.21; DRP2 05.01.22; DRP3 25.02.22; DRP4 21.06.22). DRP4 reviewed the original planning submission while the earlier reviews were at pre-application stage. Design South East also established a Community Review Panel of local residents, business owners and community organisations that met four times (CRP1 12.10.21, CRP2 19.10.21, CRP3 22.11.21, CRP4 22.02.22). The applicants and the local planning authority were present at all eight meetings to explain the scheme and listen to the feedback so that it could inform the design process. Letters were produced summarising the views expressed and reference is made in the remainder of this section to observations made by both panels that are relevant to the submitted scheme.

National Design Guide / National Model Design Code		Building for a Healthy Life	Development Management Policies Plan
Context - enhances the surroundings			
C1	Understand and relate well to the site, its local and wider context	Making the most of what's there	DM3b. Long views
		Green and blue infrastructure	DM3c. Local distinctiveness and character
			DM3e. Density
			DM3h. Materials and details
			DM3i. Green infrastructure, landscaping and biodiversity
C2	Value heritage, local history and culture	Making the most of what's there	DM3b. Long views
		A memorable character	DM3c. Local distinctiveness and character
			DM9. Safeguarding Norwich's heritage
Identity - attractive and distinctive			
I1	Respond to existing local character and identity	Making the most of what's there	DM3a. Gateways
		A memorable character	DM3c. Local distinctiveness and character
		Easy to find your way around	DM3e. Density
			DM3f. Height, massing, scale and form
			DM7. Trees and development
			DM9. Safeguarding Norwich's heritage
I2		A memorable character	DM3c. Local distinctiveness and character

National Design Guide / National Model Design Code		Building for a Healthy Life	Development Management Policies Plan
	Well-designed, high quality and attractive places and buildings		DM3h. Materials and details
			DM9. Safeguarding Norwich's heritage
I3	Create character and identity	A memorable character	DM3b. Long views
			DM3c. Local distinctiveness and character
			DM3h. Materials and details
			DM9. Safeguarding Norwich's heritage
Built form - A coherent pattern of development			
B1	Compact form of development	Walking, cycling and public transport	DM3d. Layout and siting
		Facilities and services	DM3e. Density
		Homes for everyone	DM12. Principles for all residential development
B2	Appropriate building types and forms	Homes for everyone	DM3a. Gateways
		Making the most of what's there	DM3c. Local distinctiveness and character
		Well defined streets and spaces	DM3d. Layout and siting
		Cycle and car parking	DM3e. Density
			DM3f. Height, massing, scale and form
			DM9. Safeguarding Norwich's heritage
			DM12. Principles for all residential development
B3	Destinations	Natural connections	DM3b. Long views
		Walking, cycling and public transport	DM3i. Green infrastructure, landscaping and biodiversity
		Facilities and services	
		A memorable character	
		Green and blue infrastructure	
Movement - accessible and easy to move around			
M1	A connected network of routes for all modes of transport	Natural connections	DM3d. Layout and siting
		Walking, cycling and public transport	DM3g. Design of roads and streets
		Easy to find your way around	DM3i. Green infrastructure, landscaping and biodiversity
		Healthy streets	DM28. Encouraging sustainable travel

National Design Guide / National Model Design Code		Building for a Healthy Life	Development Management Policies Plan
		Cycle and car parking	
		Green and blue infrastructure	
M2	Active travel	Natural connections	DM3d. Layout and siting
		Well defined streets and spaces	DM3g. Design of roads and streets
		Easy to find your way around	DM28. Encouraging sustainable travel
		Healthy streets	DM31. Car parking and servicing
M3	Well-considered parking, servicing and utilities infrastructure for all users	Cycle and car parking	DM31. Car parking and servicing
		Back of the pavement, front of home	DM2. Amenity
Nature - enhanced and optimised			
N1	Provide a network of high quality, green open spaces with a variety of landscapes and activities, including play	Natural connections	DM3d. Layout and siting
		Facilities and services	DM3h. Materials and details
		Green and blue infrastructure	DM3i. Green infrastructure, landscaping and biodiversity
			DM7. Trees and development
N2	Improve and enhance water management	Well defined streets and spaces	DM3i. Green infrastructure, landscaping and biodiversity
		Green and blue infrastructure	DM3j. Energy efficiency and climate change
			DM5. Planning effectively for flood resilience
			DM7. Trees and development
N3	Support rich and varied biodiversity	Well defined streets and spaces	DM3g. Design of roads and streets
		Healthy streets	DM3i. Green infrastructure, landscaping and biodiversity
		Green and blue infrastructure	DM6. Protecting and enhancing the natural environment
			DM7. Trees and development
Public spaces - safe, social and inclusive			
P1	Create well-located, high quality and attractive public spaces	Well defined streets and spaces	DM3d. Layout and siting
		Healthy streets	DM3g. Design of roads and streets
		Green and blue infrastructure	DM3h. Materials and details
			DM3i. Green infrastructure, landscaping and biodiversity
			DM31. Car parking and servicing

National Design Guide / National Model Design Code		Building for a Healthy Life	Development Management Policies Plan
P2	Provide well-designed spaces that are safe	Well defined streets and spaces	DM3d. Layout and siting
		Healthy streets	DM3g. Design of roads and streets
			DM31. Car parking and servicing
P3	Make sure public spaces support social interaction	Facilities and services	DM3d. Layout and siting
		Healthy streets	DM3g. Design of roads and streets
		Green and blue infrastructure	DM3i. Green infrastructure, landscaping and biodiversity
			DM31. Car parking and servicing
Uses - mixed and integrated			
U1	A mix of uses	Facilities and services	DM3c. Local distinctiveness and character
		Easy to find your way around	DM3e. Density
U2	A mix of home tenures, types and sizes	Homes for everyone	DM12. Principles for all residential development
U3	Socially inclusive	Facilities and services	DM2. Amenity
		Homes for everyone	DM12. Principles for all residential development
Homes & buildings - functional, healthy and sustainable			
H1	Healthy, comfortable and safe internal and external environment	Healthy streets	DM3i. Green infrastructure, landscaping and biodiversity
		Green and blue infrastructure	DM2. Amenity
H2	Well-related to external amenity and public spaces	Well defined streets and spaces	DM3d. Layout and siting
		Healthy streets	DM3g. Design of roads and streets
			DM2. Amenity
H3	Attention to detail: storage, waste, servicing and utilities	Back of the pavement, front of home	DM3h. Materials and details
			DM2. Amenity
Resources - efficient and resilient			
R1	Follow the energy hierarchy		DM3j. Energy efficiency and climate change
			DM4. Providing for renewable and low carbon energy
R2	Careful selection of materials and construction techniques		DM3j. Energy efficiency and climate change
R3	Maximise resilience	Natural connections	DM3i. Green infrastructure, landscaping and biodiversity
		Walking, cycling and public transport	DM3j. Energy efficiency and climate change

National Design Guide / National Model Design Code		Building for a Healthy Life	Development Management Policies Plan
		Making the most of what's there	
		Blue and green infrastructure	
Lifespan - made to last			
L1	Well-managed and maintained	Green and blue infrastructure	DM3i. Green infrastructure, landscaping and biodiversity
L2	Adaptable to changing needs and evolving technologies		DM3j. Energy efficiency and climate change
			DM12. Principles for all residential development
L3	A sense of ownership	Well defined streets and spaces	
		Back of the pavement, front of home	

Context - enhances the surroundings

514. This section concentrates on issues of context and integration, particularly as they relate to the surroundings. The next section looks at whether the development creates identity and distinctiveness given that its geographical extent and recent history creates a degree of freedom of expression, particularly within the scheme and where public uses are proposed.
515. The tension with developing Anglia Square successfully is trying to simultaneously integrate with the existing surroundings, acknowledge what was there on the site before Anglia Square, capture the boldness and distinctiveness of the spirit that informed the design of the buildings currently on the site, and build in a way that covers costs and achieves a modest profit that justifies the development risk that is being taken. This is a significant challenge and goes some way to explaining why the site has stood dormant for so long.
516. When considering the application of planning policy calling for integration with context there is a tendency to disregard the existing condition of the site. This is wrong for two reasons: firstly, the presence of tall and bulky buildings on the site is the point of comparison in judging the magnitude of change and whether the change is beneficial or detrimental; and secondly the judgement of whether the development is successful should not be overly determined by whether it politely and humbly integrates into its surroundings. To do so would be to deny the value of a bolder vision of post-war development that infused Anglia Square and motivated its designers to make it stand out and which is a source of pride to many local people.
517. The surroundings of the site are not homogenous, and its character is well described in the City Centre Conservation Area Appraisal. It is not consistently low-rise and there are buildings of considerable height on and adjacent to the site that have been present for around fifty years, such as Sovereign House and St Crispin's House. Other voices, such as those at the community review panel, find

value in the bold ambitions and raw quality of the current buildings on Anglia Square, and do not want to lose their spirit when they are replaced. This was captured in the CRP1 letter: *“The local community enjoy its special character which was described as ‘gritty’ and ‘robust’. This character was described as reflective of the community Anglia Square serves, although it was acknowledged that the buildings and infrastructure of the Square have become dated and are in need of rejuvenation. There were comments that any renewal of the Square should not lose the existing strong characteristic of contrast and difference which Anglia Square provides and which adds to the wider interest of the city.”* The Council does not agree with those organisations who advocate an approach that is entirely guided by a mission that this development proposal must “fit in” and defer to a low-rise benchmark that predates the current buildings on the site.

518. The local planning authority has been advocating design solutions that straddle both objectives by identifying certain parts of the development that have particular significance and warrant a bold (but not necessarily big) approach, even when on the edge of the scheme so that Anglia Square remains a distinctive part of the city centre but one that embraces its historic surroundings more successfully than the current site conditions. These are:
- Stump Cross (block L), which is a point of arrival from the south on Magdalen Street and has a transport interchange function)
 - Block D, which is a point of arrival from St Augustine’s Street from the north-west and Edward Street from the north and has a community use
 - South-west corner of block G, which is a point of arrival from the south on St George’s Street opposite the crossing of St Crispin’s Road, which has the potential to echo the strong architectural style of this element of Sovereign House.
519. The assessment of heritage impacts in the preceding section shows that in relation to almost all heritage assets and by comparison with what is there now the development manages the contextual relationship well. DRP1 said: *“Generally, we are comfortable with the overall approach to height and massing”, although they went on to say “There is a risk that the southwest corner of the site will feel too high, particularly because of the height of upcoming development around this location. This combination of intense development with the high-traffic roundabout means this whole corner could feel unattractive.”* DRP2 said: *“The stepping up works, and the logic of which locations are higher and lower makes sense. However, in places there is a risk of the approach feeling repetitive or monotonous. There could be some locations that are even higher and some that are even lower and more intimate, particularly on tighter narrower streets. This could give more of a range of scales and a more diverse character across the whole site.”*
520. In terms of the height of the development this scheme seeks to achieve an acceptable relationship with the surrounding context by having no buildings that exceed the height of Sovereign House, placing the tallest buildings in the middle of the site and falling away towards the edges with four to seven stories presented to Pitt Street, three to five stories on Edward Street and three to four storeys on Magdalen Street.

521. Pitt Street is wider than most in the area and it widens out further at its junction with St Augustine's Street and New Botolph Street. The relationship with St Augustine's Church and 2-12 Gildencroft is discussed in the section above concerning the effect on heritage assets. However, it is worth noting here that the relationship with the Pitt Street and St Augustine's Street context is eased by several measures – the frontage of block E steps up and down between 4, 5 and 6 storey; there is a mix of uses, particularly at the junction of Botolph Street with New Botolph Street; and St Augustine's Street is reconnected with the city centre via new streets and public spaces leading to Magdalen Street and St George's Street. It will be possible and important at reserved matters stage (if the current application is approved) to secure vertical division in the façade of block E and variation in its character with neighbouring blocks to create interest.
522. Magdalen Street will be widened at the point where block K is inserted allowing four stories to fit comfortably, especially given that the character of the street is more fragmented here with the bulky building accommodating Roys immediately opposite. The most problematic building in this edge context was block D until it was lowered by one storey in response to feedback on the original submission.
523. There are local features of special interest in Magdalen Street and St Augustine's Street that are identified in the conservation area appraisal which provide some cues to the architectural treatment of new buildings in the vicinity:
- Wider north – south commercial streets that have continuous building lines and multiple building frontages with ground floor activity interrupted by regular entrances to east-west oriented side alleys and courtyards accessed through archway.
 - Buildings dating from c17-19 of up to three storeys in height of red brick with pantile roofs.
 - Richly detailed elevations consisting of decorative joinery and, red brick, some flint and plaster/render, fenestration, ornate doorcases, patterned walls and traditional shopfronts.
524. Block K presents an appearance of vertical subdivision into narrow plots that complements the prevailing character of development on Magdalen Street. This is a welcome replacement for the jettied overhang and low horizontal emphasis of the current building. The Juliette balconies and French windows that are proposed for the flats in blocks K and J3 are less compatible with that character, although the subtle and creative allusions to mourning crepe designs in the balustrades is a welcome enhancement following the original submission.
525. The cat-slide roof on block J3 feels bold and responds to local vernacular. Larger windows in the north elevation could have provided more interest to that elevation and more illumination for the bedrooms within but the augmentation of the brick detailing in revision A is welcome as is the addition of a dark grey pantile roof in revision B.
526. The main material to be used is red brick, which is a contextually local and vernacular material for the area. However, the proposed header bond panels and coursing is not the way this material has traditionally been used in the area. The

use of Flemish bond brickwork with headers in a darker brick along the east elevations of blocks J3 and M would be more compatible with the surroundings.

527. The textured brickwork proposed on the north elevation of block J3 facing Botolph Street and the upper parts of block A are attractive and interesting. The brick fluting detail seen on block A could be incorporated horizontally as well as vertically in other parts of the development. Such a horizontal emphasis is more characteristic of the existing brutalist buildings on the Site. We like to see more extensive use of brick patterning techniques in Anglia Square to further enliven the facades.
528. Block B1 has a simple design that successfully reinstates lost red brick terraced weaving houses on roughly same footprint with a pleasing rhythm of openings. St Augustine's Street is characterised by an unusually complete roofscape of red clay pantiles with some black and blue clay examples. The roofing material proposed for blocks B1 and B2 was beneficially changed to blue pantile following the original submission.
529. The layout and movement framework of the proposed development responds coherently to the local context by knitting together surrounding streets and reinstating lost streets on an alignment close to that which existed before Anglia Square was built. Botolph Street is a particularly important example of this. It will terminate and focus on St Augustine's Church at the west end and the resurrected heart of Norwich Over the Water at Stump Cross to the east where it touches Magdalen Street. The naming of streets, alleys and yards can commemorate their predecessors and highlight the continuity of extended streets, such as St George's Street. Some of the physical fabric of surviving surfaces, such as the granite setts and kerb stones to the west of Sovereign House can be reused in the surface of the extended section of St George's Street. This needs to be covered by a planning condition. There is more on this in the sections on movement and public spaces.

Identity – attractive and distinctive

530. The applicant's attempt to make the case that architectural expressions are loosely derived from types of building that once stood on the site. Yards and factories are identified as historic design inspirations for some of the proposed buildings and their relationship with spaces. However, the yard analogy is being stretched in the context of buildings that are much taller than their predecessors and the factory reference is hard to apply to residential buildings that are newly built rather than converted from buildings previously used as factories. The Council's greater concern through the design development has been to ensure there is sufficient variation in the character and distinctiveness of the design that the architectural expression should live up to the bold spirit of what is there now and which many of the people who attended the community review panel meetings value. DRP4 said that *"more should be done to inject variety and distinctiveness into the architecture"* and recommended the applications should *"introduce more differentiation, variety and definition of character into the buildings throughout, in particular the Stump Cross building, Block D, and prominent corner buildings"*. This is discussed below in relation to the detailed components of the application. Any reserved matters applications will present an opportunity to introduce further variety.

531. The Chamberlain's factory building that once stood on the site with its north-lit roof pitch, curtain walling and multi-paned glazed windows is quoted by the applicants as an inspiration for the design of block K1. This building is an anchor of the scheme addressing Anglia Square. It is not fettered by the contextual constraints of surrounding historic buildings and warrants a bold treatment that does not need to be influenced by factory precedents. The final form of the façade that addresses Anglia Square is a strong piece of architecture which robustly spans the length of the square from Botolph Street to Anne's Walk. Its most satisfying aspect is the differentiation of levels by increasing the portion of wall surface to window surface from the bottom to the top of the building. This complements the commercial use at the bottom of the building and the domestic use above, with the attic storey further differentiated. The increasing transparency of the balcony metalwork from bottom to top echoes the gradation from transparency to solidity of the main building surface and has the functional benefit of preventing visual intrusion into lower flats.
532. In accordance with the Council's aim for certain buildings to capture the ambitious and distinctive spirit of Anglia Square, we have encouraged the applicants to make block D one of the most distinctive buildings on the site due to its gateway location and community use. It is the only building on the site with a curvaceous plan, which sets it apart. It is appreciated in the round more than any other building due to its smaller footprint and encircling streets. Its incorporation of community uses means it is a building that should feel human scaled and welcoming. The vertical fluted brickwork contributes to the differentiation of the residential use of the upper floors from the community use below and the light-coloured brick further sets it apart from its neighbours. These can be seen as a diluted reference to the site's 1960s chapter of brutal architecture, characterized by strong forms, a horizontal emphasis and the use of concrete (another light-coloured material). Excessive height would also undermine the desired emphasis on its horizontal layering that correspond with building uses. The reduction in height from six to five storeys following the original submission has helped to achieve a horizontal emphasis to the building that complements its curvaceous form. Nevertheless, Historic England conclude that "*The form and height of Block D fails to respond to its context...*". The Council does not take such a critical approach following the reduction in height because the building now achieves the delicate balance between having a strong presence whilst not harming the wider historic context or feeling hostile in scale when approaching the main public entrance on Botolph Street. This entrance feels generous, welcoming and appropriately scaled. The corner facing St Augustine's Street is less successful because it lacks both a public entrance and any special architectural emphasis.
533. The spiral staircases on Sovereign House are identified in the Anglia Square character appraisal as providing townscape interest. A reinterpretation of this feature on the prominent south-west corner of block G could offer an interesting flourish and a respectful acknowledgement of what was there before. This would be a matter to consider at the reserved matters stage.
534. Bolt on balconies are heavily deployed across the site. While offering some useful private outdoor space, architecturally they can conceal interesting features of the building and they also reduce light to windows below. Where balconies are attached, a variety of metalwork patterning would help lend distinctiveness and solidity. DRP3 encouraged the architects to "*use balcony design to contribute to variety across the site.*" They have responded in revisions to the original

submission with balconies in a rich blue colour on block K1 facing Anglia Square that move from solid to more widely spaced balustrades up through the building and block K2 and block J3 facing Magdalen Street will feature Juliette balconies with a balustrade design that is inspired by the pattern of silk mourning fabric that was formerly made on the site by the Norwich Crape Company. These changes are beneficial, and it is hoped that similarly creative approaches are used in the parts of the site that would be subject to reserved matters application (if the current application is approved) along with a greater proportion of recessed balconies that are formed within the envelope of the building.

535. Concrete features strongly in Anglia Square currently and will be entirely absent from the external surfaces of the new development. This will erase an important stage in the architectural history of the area, and it would have been good to see concrete used in at least one new building as a prominent feature. The City Centre Conservation Area appraisal gives license for this: “... *areas of Low significance, a wider range of contemporary materials can be used, provided that they either respect the traditional building materials of the area or create a successful contrast with them.*” However, the extensive use of concrete would not be appropriate given its high level of embodied energy.
536. The proposed use of dark brick in block J3 and light brick in block L surrounding the Stump Cross space is bold and will help to give distinction to this space and its buildings. There is a concern that the proposed use of black brick facing the flyover will make that space feel gloomy and it would be better if some lighter bricks were used as highlights in combination with lighter window frames. Block L successfully addresses the space and is a homage to buildings that previously existed at this pivotal point where Magdalen Street and Botolph Street met. The removal of the westernmost bay of block L following the original submission has helped to ensure that the sense of Botolph Street branching off to the left is obtained in views from south of the flyover on Magdalen Street (e.g. views 19 and 30). Further detailed interest could be given to the building at close range by chamfering the brickwork around the loggia and window surrounds like the brick columns of 44-48 Sackville Place nearby.
537. The floorscape and canopy in Anglia Square itself are another place where extrovert and memorable approaches are needed. The Council encouraged the bold use of colour and pattern rather than a polite use of stone and the applicant has responded to this in their revisions following the original submission. Further work is needed on the design of the canopy, which should be focused in one place as a single element or form a set of overlapping mini canopies that cover an extensive area and provide shelter from the elements where seating can be located. DRP4 made a similar observation: “*Ensure the canopy in Anglia Square is of sufficient size to protect against inclement weather.*” These elements combined with a small number of feature trees at the northern end would provide delight for users of the space and residents looking down from above. More information can be found in the landscape comments provided separately.
538. Shopfront treatments offer an opportunity for the enhancement of the development’s individuality and character. High quality shopfronts with attractive design are a key character of Norwich’s historic and commercial streets and some of the city’s finest late nineteenth and early twentieth century shopfronts line nearby Magdalen Street and St Augustine’s Street. These shopfronts consist of traditional timber frames with painted facias, pilasters, corbels and recessed

entrances that capture the human scale, proportionality and craftsmanship / finer details that help create positive townscape.

539. The applicant has provided a document of 'coloured shop front drawings' detailing the shopfronts for some of the development blocks, although the Magdalen Street frontage of block KL is not included and neither is information about the proposed materials. The architectural framing is being treated as part of the detailed application for which consent is sought but approval of individual shop fascias would be sought by the occupants. A condition should be attached to any permission for the development that requires these to be individually submitted for approval but should conform to a Shopfront and sign design guide that would also be required by condition.

540. Successful features of the coloured shopfront drawings are:

- The brick pilasters seen at Block A that help break shopfronts into smaller units which are more reflective of the mullion divides seen on traditional shopfronts.
- Arched openings seen on Block K helpfully dilute the risk of a monotonous rectilinearity in the buildings and shopfronts. In a greater quantity and if made a feature of the development, the arches may compliment the yard openings seen across the city which could positively acknowledge the scheme context.

541. Weak features of the shopfront drawings are:

- The great expanse and height of glazing on the red brick element of the north side of block KL facing Botolph Street that lacks human scale and contrasts strongly with the character of shopfronts on Magdalen Street. The same criticism can be made of the grey brick element of the same elevation, which has a central fascia flanked by two square planes of glass, which would be better with a continuous fascia.
- Apparent, lack of hanging signs to create character.

542. Applying uniform lettering across the scheme such as signage for 'Anne's Walk', 'Bike Store' and 'Anglia Square' has the potential to improve the development's individuality.

543. The typography of street signage could offer a further layer of coherence to the development (such as for 'Anne's Walk', 'Bike Store' and 'Changing Places Toilet'), although the typeface shown on the drawings lacks interest. Rather than applying it conventionally to the walls on plates it could be set within the skin of the building in a contrasting material, such as ceramic. Street name plates might be combined with the brackets for wall-mounted lanterns on the corner of buildings, which also illuminate the lettering.

Built form – a coherent pattern of development

544. The positioning of buildings as perimeter blocks framing squares, streets and yards will give a high degree of coherence to the development. Many residents will benefit from podium gardens within the blocks. The new streets provide a much

higher degree of connectivity than the existing situation and point towards features outside the site e.g., St Augustine's Church, activity on Magdalen Street, St George's Street and trees in the Quaker Burial Ground.

545. It is desirable for the public to be able to walk through Sovereign Yard within block H between Botolph Street and Sovereign Way and this feature of the scheme is welcome along with the recent change to the dual frontage building between Sovereign Yard and Botolph Street from residential to commercial that will support the creation of activity and interest within the courtyard if it were used as a café or restaurant. The parameter plan designates Sovereign Yard as semi-public, and clarification is needed about what restrictions are proposed. It ought to be open 24/7 unless problems arise following its completion that can only be resolved through gating at night.
546. The orientation of taller blocks in a north-south alignment is a wise strategy to admit light into the middle of blocks from the south but in some places the juxtaposition of the tall ends of these blocks across narrower streets and lanes leads to an uncomfortable height to width ratio that may feel oppressive in places, although a pleasing contrast between containment and release might be achieved when entering or leaving St Georges Gardens and Anglia Square. Examples are:
- Southern section of Beckham Place between blocks A and M
 - The entrance to the middle section of Botolph Street off Anglia Square between blocks A and H
 - Southern end of Calvert Yard between blocks G and J
 - East end of Tooley Lane between blocks E/F and F
 - West end of Sovereign Way between blocks H and G
547. Stump Cross has always been the most important focus of activity north of the River Wensum where the routes from the north of the city converge on Magdalen Street. The construction of Anglia Square and the replacement of Botolph Street with the existing Sovereign Way injured this. Sovereign Way currently runs perpendicular to Magdalen Street and is covered by the bulk of the cinema building above it and denies it light. The flow was lost along with the opportunity to locate a building with presence at the bifurcation point of these routes. The new configuration offers a version of Botolph Street that flows better than Sovereign Way by growing out of the splayed building line on block J3. This building line also gives a wider area to accommodate the intensity of movement and social activity that occurs at Stump Cross. Further collaboration between the applicant, Norfolk County Council and Norwich City Council will be necessary following a grant of planning permission to address the recommendation of DRP4 that the local authority should *“Work with the applicant to resolve and finalise the plans for Stump Cross.”*
548. Block L is a key building that forms the northern edge of the Stump Cross space. Historic England are critical of the way it is designed. They say: *“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 the 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."

549. Buildings of presence and classical symmetry have stood on approximately this site in the past serving as a visual marker of the point where Magdalen Street and Botolph Street diverge. We have worked with the applicant to capture the spirit of these buildings in the new proposal and furthermore to treat this as a landmark building that appropriately marks the entrance to the development, fronts an important public space and has commercial use throughout. They propose a building with a regular grid composed of five bays and four storeys. The grid of brick piers is further emphasised by the ground floor being a colonnade and the top storey a terrace with a view over the flyover to the city centre skyline punctuated by the Castle and Cathedral. The use of a colonnade at the bottom of block L will add further spatial richness and shelter from the weather. By moving the building line of block L north after the original submission the applicants have avoided various problems that would otherwise have occurred thereby keeping the view of Magdalen Street from within Anglia Square open when walking along Botolph Street, creating space for pedestrian circulation around the building, avoiding a hidden space in the corner of the block L where it joins block K and retaining sufficient space for bus stops on Magdalen Street. The building is also set apart from the adjacent new building elements on Magdalen Street and Botolph Street by being one storey taller and faced in light brick.
550. The retention of Surrey Chapel, a two-storey building, creates a problem in dealing with the neighbouring building elements that comprise block F. Several principles apply: the new buildings should not prevent Surrey Chapel being redeveloped in the future; the residential amenity of people living in block F should not be spoiled by any redevelopment of the Surrey Chapel site; and the architectural relationship between block F and Surrey Chapel, while it continues to exist, should be satisfactory.
551. An eight-storey element of block F presents its south elevation to Surrey Chapel and can be seen above it from St Crispin's Road. At its closest point this block will be six metres away from the rear wing of Surrey Chapel. A six-storey element lies to the west and at its closest point will be seven metres away from Surrey Chapel. The proximity and scale of block F will not prevent Surrey Chapel being redeveloped but any replacement building is likely to have a smaller footprint and / or height than it would otherwise.
552. If viability considerations mean neither the footprint nor height of block F can be altered, it will be important to ensure that the layout of flats and the position and design of balconies on the elevations facing Surrey Chapel do not rely exclusively on these elevation for their light and outlook. Since block F is in outline this will need to be given careful consideration in developing the details for a reserved matters application. Furthermore, the expression of these prominent building elements will need to be handled well because they will be highly prominent when viewed from the south, with an awkward and abrupt juxtaposition of height between Surrey Chapel and the new building that will need to be mitigated (or

even exploited) through architectural design. The applicants should consider the DRP4 recommendation to “*Reintroduce more variety into the masterplan around Block F*”, although the degree to which this can be achieved with the blocks in the parameter plans is limited. The scope to meet their recommendation to “*Resolve the inactive frontages and confused backs and fronts on Tooley Lane.*” is greater, albeit constrained by having two public frontages.

Movement – accessible and easy to move around

553. The proposed replacement street network was commended by DRP4, which said that “the masterplan works well in terms of connectivity and street hierarchy...” This is important because 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 an unwelcoming place.
554. The Site is centrally located and benefits from very good access to bus services, walking and cycling routes, although there is potential for these to be improved. The success of high density of development depends on good access to sustainable transport services. These are abundant in the locality and will be improved through the development.
555. Levels of parking are lower than currently on the site and the ratio of parking spaces to homes is lower than many developments that have been built near the city centre. Nevertheless, further reductions would be welcomed and create opportunities for design improvement in the outline part of the development if demand for spaces in phase 1 of the development is lower than expected.
556. Magdalen Street is one of the most intensively served streets in Norwich by buses, which connect to north Norwich, the north of Norfolk and the rest of Norwich directly or via interchange in the city centre. The development will place more demand on these services and therefore an increase in capacity for buses to pick up and drop off in Magdalen Street is required. The draft design for the mobility hub features two additional southbound bus stops, which will alleviate the pressure on the existing single stop underneath the flyover.
557. Inbound bus passengers can continue to alight at the stop on the north side of Edward Street (east) and their experience will be enhanced by the development due to the ability to access Anglia Square directly via the new section of Beckham Place. Furthermore, the environment in Edward Street will feel more welcoming, safe and attractive due to overlooking from properties in block C and block A.
558. The cycle network serves the site via two north-south routes: the blue pedalway on Magdalen Street and the yellow pedalway on the existing alignment of Botolph

Street and the northern section of Edward Street. East-west routes across the site are currently completely lacking.

559. The quality of the yellow pedalway within the site is currently very poor with an uncomfortable surface on Botolph Street and the need to deviate at the northern end to avoid the surface car park and use the shared use path on the south side of New Botolph Street. Botolph Street feels vacant and hostile, especially at night, due to the lack of active frontages.
560. The development promises to create a hugely improved experience for cyclists on the yellow pedalway with a dedicated cycle track along the northern extension of St George's Street. This links to the crossing over St Crispin's Road, which is retained, to the south. A deficiency of the scheme as originally submitted was the lack of any dedicated cycling infrastructure connecting northbound cyclists on the yellow pedalway using St George's Street to St Augustine's Street between New Botolph Street and St George's Street. It was also unclear whether the modifications to the crossing arrangements over New Botolph Street at the west end of Botolph Street would cater for cyclists. This was accepted by the applicant and has been rectified through a modification to the proposed crossing of New Botolph Street to include an area for cyclists to cross adjacent to pedestrians and a delineated route to join St Augustine's Street. This arrangement offers substantial benefits for pedestrian and cyclists' convenience and comfort and fulfils the recommendation of DRP4 to "Ensure key routes, particularly north-south along St Georges Street, and from Botolph Street onto Magdalen Street, connect to suitable crossings on the site's edge".
561. The experience of using the blue pedalway on Magdalen Street is currently compromised by the level of traffic on Magdalen Street. There is little the development can do to improve this situation.
562. East-west connectivity for cyclists will receive some improvement over the currently very poor condition due to the inclusion of a route along Cherry Lane on the north side of the flyover. The proposed crossing on Magdalen Street will allow onward journeys towards St Paul's Square and Barrack Street. Cyclists wishing to ride from Stump Cross to the northern section of Edward Street or St Augustine's Street would be allowed to ride along Botolph Street and through the new Anglia Square public space, but this would cause some pedestrian discomfort and due to pedestrian volumes cyclists' progress would be impeded. The alternative new Cherry Lane / St George's Street route combined with the existing Magdalen Street / Edward Street route around the northern perimeter of the site will reduce the demand to ride through Anglia Square.
563. The removal of the existing poor-quality shared use path on the east site of Pitt Street and the lack of a replacement is amply compensated by the new high-quality route on St George's Street.
564. The quality of environment for pedestrians will be dramatically improved by the development. The following assessment reviews the proposed condition of the perimeter of the site clockwise from Stump Cross and then the routes through it.
565. Cherry Lane is a new route through the area where the southern service yard is currently. As such it is a considerable new asset to the movement framework in the area.

566. Walking along the north side of St Crispin's Road between St George's Street and Pitt Street will be enhanced by removal of the slip lane and its incorporation into the verge allowing the planting of trees in a swale. This will act as a buffer to the pollution caused by heavy vehicle use on the dual carriageway. Unfortunately, the featureless wall of Surrey Chapel will remain because it is not within the control of the developer.
567. The southern section of Pitt Street (south of the proposed Tooley Lane) will not be enhanced by the scheme due to the replacement of modestly scaled buildings, including locally listed 43-45 Pitt Street, with taller buildings that will create additional shading over the footway in the morning.
568. The original scheme submission included a pedestrian crossing over Pitt Street at the end of Tooley Lane that offered good connectivity to Gildencroft Park from within the southern part of the development and to the footway on the north side of St Crispin's Road and any future development of St Crispin's car park linking to Chatham Street. This was not supported by the highway authority and has been withdrawn, which means that the connectivity to the park will not be improved. It is hoped that improvement to pedestrian connectivity could be revisited in association with development that might take place to the west of Pitt Street, which would strengthen the business case for doing this.
569. The northern section of Pitt Street will certainly be enhanced for pedestrians because it is currently a narrow shared-use path between a three-lane road and a bund of earth shielding the surface car park on the site. This condition will be replaced with a building frontage consisting mainly of homes, cycle stores and residential entrances offering natural surveillance and some visual interest. The proposed swale with tree planting will offer aesthetic benefit and buffer the road adjacent to the frontage of block E/F. However, some of this benefit will be reduced by the coincidence of the service bay opposite the entrance to Gildencroft Park that prevents planting, the entrance to the car park within block E and the visibility splay associated with it and the very wide footway.
570. The ability to cross New Botolph Street conveniently and directly from Botolph Street to the paved space in front of the properties at the southern end of St Augustine's Street is critical for pedestrian flow and the feeling that this reinstated route between Magdalen Street and St Augustine's Street is only marginally interrupted by traffic using the gyratory. The proposed new direct crossing for cyclists and pedestrians will be a major improvement on the existing convoluted, tight and ambiguous arrangement.
571. The layout of the two buildings forming block B enable a private connection to be created from St Augustine's Street to Edward Street by removing a section of wall at the back of Rose Yard. This will provide access for children in block B to the play area in Leonard Street and also be an approximate recreation of the former extent of Rose Yard, once one of the largest historic yards in Norwich.
572. The footway on the south side of Edward Street will be significantly widened to the benefit of pedestrians and the planting of trees will further enhance the experience in a section of street that is currently bleak due to the presence of semi-derelict buildings and a lack of vegetation. However, the potential for improvement is reduced by the extent of frontage devoted to ancillary uses (residential plant and

cycle storage). The consolidation of two car park accesses into one following the original submission has helped.

573. The north side of Edward Street will be enhanced by the erection of block C and the filtered view of its gardens. It would be preferable for the footway on the north side of Edward Street to be widened slightly with less space offered to the south side, especially in the vicinity of the bus stop. However, the cost would have been considerable.
574. The footway on the west side of Magdalen Street will be widened because of block K/L being set back and the feeling of spaciousness will be reinforced by the removal of the buildings overhanging the footway currently on the site. This will mean that pedestrians have more space to walk comfortably past each other and further from the side of moving buses. The footway on the east side of Magdalen Street will remain narrow by contrast with the new west side.

Nature – enhanced and optimised

575. An assessment of how well the development enhances and optimises nature is contained in Main Issue X of this report relating to landscape and ecology.

Public spaces – safe, social and inclusive

576. An assessment of how well the development provides safe, social and inclusive public spaces is contained in Main Issue X of this report relating to landscape and crime prevention.

Uses– mixed and integrated

577. Anglia Square was built as a shopping centre with cafes and a nightclub on the ground floor and with offices, a cinema and car parking above. The cinema, offices and nightclub have closed and there has never been anyone living in Anglia Square. The new scheme introduces a residential population on the site, which will mean the streets and spaces are enlivened by people entering and leaving the residential entrances and overlooking from the flats. St George's Street and the lanes and yards will have a residential character.
578. The scheme rightly recognises the primacy of the reinstated route of Botolph Street connecting Magdalen Street and St Augustine's Street by locating most of the commercial space there and in with Anglia Square itself, which lies on the route. The residential entrances are more thinly spread, so the continuity of commercial frontage is not interrupted too much. The community building and public toilets are also purposely located on or near this main street to give them prominence and ease of access. The provision of a Changing Places facility is very welcome and a notable public benefit of the scheme.
579. Sometimes the auxiliary spaces that serve this dense form of development are in unfortunate places, often on streets around the edge, which will risk contributing to a sense of this being an island that looks inwards. Examples are the tendency for block D to turn its back on New Botolph Street and the poor ground floor condition in block E opposite Gildencroft Park. However, this criticism needs balancing against the benefits of creating largely car free streets within the site that supports the flourishing of activity in the public realm within the scheme. The ground floor of

block A facing Edward Street was improved following the original submission by combining the two car park entrances into one.

580. DRP4 recommended that the applicant should *“Improve the relationship between residential accommodation and the streets by introducing more thresholds and defined and celebrated residential entrances.”* Most of the residential frontages are within the outline part of the application and therefore any reserved matters applications should address this. The space allocated in the masterplan and parameter plans are capable of accommodating this.
581. Many people in the surrounding community and others who arrive by bus want to continue to be able to shop affordably in Anglia Square with familiar businesses. It is important that as many of the current traders as possible can find a new space within the development if they wish to stay and that rents reflect what they can afford to pay. The business potential of these new units will be boosted by the spending power of over one thousand new households living above and around the shops and cafes.
582. The flexible class E designation of floorspace within the development will allow for office use. It is hoped that some live / work accommodation can be provided in the blocks covered by the outline application. Units within the yards would lend themselves to this and enhance their character while addressing concerns about the levels of light penetration into the ground floor of some units.

Homes & buildings – functional, healthy and sustainable

583. A commentary on the levels of residential amenity is included in Main Issue X of this report.

Resources – efficient and resilient

584. The amount of energy embodied in the construction materials is often overlooked with the focus of energy saving being on operational use and we do not currently have a basis in policy to insist that the development is assessed against embodied energy metrics. Nevertheless, the development will consume large amounts of energy by replacing almost all the buildings on the site and with buildings constructed from materials that are likely to have high embodied energy. This is disappointing and places more onus on the need to minimise energy consumption in use and the value of developing intensively in a location that is well served by sustainable transport options.
585. The energy and sustainability strategy report indicates that policy requirements will be comfortably exceeded by deploying air source heat pumps throughout the development. In architectural terms the submitted information indicates that the heat pumps will have little impact on the facades by resembling air bricks.
586. At an earlier stage of considering this application we expressed concern to the applicant about the risk of overheating in some residential and commercial properties during extreme heatwave events that appeared to be suggested by the Energy Assessment and Sustainability Strategy. The applicant explained that the modelling does not take account of shading from neighbouring buildings, only shading from the building the room is situated within and does not include use of internal blinds / curtains, use of portable fans or residents reducing use of heat

generating appliances. In practice residents do actively take measures to cool down homes in extreme weather situations.

587. The scheme is compliant with the CIBSE TM59 guidance on overheating and the modelling test results demonstrate the development performs very well during extreme heatwave events with climate change allowance and ordinarily it is expected not all units will pass such tests. There are two weather files in the modelling that represent climate change scenarios (DSY2 and DSY3). For DSY2 modelling all units pass and for the DSY3 modelling 91% units pass test (a) and 99% pass test (b).
588. The purpose of the modelling is to identify units with a risk of overheating without any mitigation measures in place and based on no shadows cast by neighbouring buildings (the modelled scenario and test results presented), to identify appropriate mitigation measures to prevent overheating. When residents use the mitigation measures stated within the report (have internal blinds / curtains and use them, use of portable fans, and reducing use of heat generating appliances) no units are expected to overheat during extreme events with climate change allowance. Residents would not need to resort to air conditioning that would contribute to climate change, put pressure on the grid and look unsightly. Commercial spaces are forecast to require air conditioning.

Lifespan – made to last

589. The current buildings on the site are interconnected in complicated ways through their servicing infrastructure, routes, bridges, ramps and ambitious multilayered architecture. As such they reflect the time of their design and implementation when heroic comprehensive redevelopment was being undertaken that swept away streets composed of rows of buildings in separate ownership and occupancy.
590. Once such a development has been undertaken it requires a huge amount of capital and effort to correct the problems because it does not allow gentle and affordable unpicking and reuse. An aim of new development on the Anglia Square site should therefore be to create individual buildings that do not depend on complicated infrastructure and could be owned and adapted more gently and incrementally in the future. Such a development requires a coordinating developer such as Weston Homes but it should be possible for buildings to be bought and sold in the future providing public spaces are properly managed through a management company or by the public sector if maintenance budgets allowed this in the future.
591. The volume of the blocks proposed will be bigger than those in the surrounding area and their intensity and sophistication of servicing will be more demanding and complex than most of those in the vicinity. This is a byproduct of the quantum of development proposed at a time when people still value access to private cars close to their homes and generate large quantities of waste. Nevertheless, several aspects of the development give it the prospect of a longer lifespan and more adaptability than the present situation:
- Two buildings will remain on the Site – 100 Magdalen Street and Surrey Chapel

- Thirteen new buildings will be constructed
 - Much of the commercial servicing will take place on street including using trolleys rather than depending on large service bays
 - There are no vehicular routes at upper levels. In particular, the vehicular circulation no longer depends on a high-level connection to St Crispin's Road and a ramped link to Edward Street. The removal of these is a major benefit of the scheme. Disconnecting Anglia Square from the flyover will mean that this feature would not frustrate any opportunities to remove the flyover and downgrade this section of the inner ring road that might arise in the future. This means that the design of the area can adapt more easily.
 - An attractive public realm that people value and becomes an integral part of the movement patterns of the area following natural desire lines.
592. The overall conclusion regarding heritage and design and compliance with the adopted development plan is included in the main conclusion of the report.

Main issue 8 Landscaping and open space

593. Key policies and NPPF paragraphs – DM3, DM6, DM8, NPPF paragraphs 9, 17 and 56.
594. The planning application is accompanied by a Landscape Strategy (LS) (and addendums) for the whole site and detailed landscape plans for the area covered by the detailed element of the application. The LS and accompanying plans set out both the site wide strategy and the detailed proposals for: creation of public spaces (including squares, new connections and existing street frontages); provision of children play opportunities; provision of communal garden spaces for residents (at ground, podium and roof level), green roofs, sustainable drainage features and biodiversity enhancements.
595. Amenity space, open space 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. As referred to under Main issue 3 the adopted GIRAMs strategy requires the provision of green infrastructure to meet informal recreational needs arising from new development as a means of deflecting visitor pressure from sensitive protected sites. 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.
596. The Anglia Square Planning Guidance Note 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 paragraph 7.55 it is stated that these areas should

consist 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 paragraph 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, to improve access to neighbouring areas whilst creating new attractive and landscaped routes across the site.

Proposed Landscape Masterplan

597. The Landscape Strategy (LS) document sets out the design approach and the analysis that has been undertaken and factors that have influenced the landscape proposals. The following are identified as landscape objectives:
- To create attractive and interesting spaces for play, for contemplation, for passing through and for meeting people;
 - To create a sense of place, so that wherever you are in Anglia Square you would know you were in its neighbourhood;
 - A sense of place that didn't lose sight of or try to hide its history;
 - A legible place where you could easily find your way;
 - To create a thriving place for people to live, work and play;
 - For key areas across the site also having their own distinct feel, but still clearly part of the wider whole.
598. It is stated in the strategy document *that there is an existing community that will form a strong base for the new proposal, Anglia Square is the civic heart of Norwich over the Water and it must continue to be so*. The document identifies opportunities to improve the current situation and these include: increasing permeability to welcome green transport methods and increasing greenery thereby improving air quality, bio-diversity and adding green infrastructure. It is stated that creating an inclusive place that welcomes new and existing users alike is also of paramount importance.
599. The landscape strategy has two layers:
- Ground floor Masterplan – public realm areas comprising streets, squares and yards
 - Roof level Masterplan - comprising communal gardens and roof terraces and green roofs
600. The strategy also includes play and lighting proposals and details landscape elements which perform a SUDs function. The bio-diversity value of proposal is measured via a bio-diversity metrics tool.

The ground floor masterplan proposals

601. For the parts of the site subject to the detailed application a set of hard and soft landscape plans have been submitted. These plans include the entire length of the two primary routes running through the site. Where these two routes are between outline blocks, a 2m wide buffer is excluded from the landscape proposals. Landscape proposals along these margins would form part of the reserved matters for these blocks.
602. The ground floor landscape framework is based around the creation of a network of car free routes across the site and the formation of several key public spaces. Three 'spaces' are proposed:
- Anglia Square – described as the civic heart – acting as an inclusive community space to dwell, gather, interact, and shop.
 - St Georges Gardens – described as the green heart allowing space for residents to spill out, play and interact.
 - Stump Cross - described as an arrival space that will allow movement and for bus waiting facilities.
603. Detailed plans have been submitted for the Anglia Square and St Georges Gardens.
604. **Anglia Square** - 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 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 30m x 60m for this space. With new streets entering/exiting the space from several directions it would benefit from improved sightlines and access compared to the existing arrangement. The submitted Sunlight Daylight Assessment indicates that the public space will exceed BRE guidance for such spaces – with 66% of the space receiving at least 2 hours of sunlight of the 31st March, against the BRE minimum of 50%.
605. The proposed layout involves an open central area with feature paving, with a circulation space of different paving around the edges. A canopy is located in the southern part of the space along with 2 specimen trees. A seating area with 3 specimen trees is located at the northern side of the space. Further seating is arranged around the central space and beneath the canopy. The principles of this layout are supported by the council's landscape officer. The paving layout is aligned on Botolph Street and features bands of large format concrete slabs on peripheral routes and smaller geometric concrete block paving in contrasting yellow and black in the centre. The paving design in the centre of square has been developed as a modern reference to the map of Norfolk and is based on a triangular pattern using triangular geometric shapes.
606. The existing canopy performs an important function, providing sheltered seating and a versatile community space for events and activities. Its presence means the existing public space is well used at all times of the year. It is therefore important

that any future canopy provides the same opportunity for users of the space. The Landscape Addendum sets out a design concept for a future canopy. This shows a canopy located in the southern sector of the proposed square and extending across appropriately a third of the central square area. The concept drawing shows an approach in which four mono-pitched canopy elements of different heights would be grouped to provide cover to a multi-purpose space. At this stage of the design process, officers are not yet satisfied that this approach will result in a sufficiently distinctive canopy or offer adequate protection from the weather. The applicant has agreed that in the event of planning permission being approved the detailed design of the canopy would need to be agreed by planning condition. The recommended condition includes reference to a plan indicating the approximate position and size of the canopy along with the design principles that a scheme for a canopy would need to meet, these include:

- Area to be covered and protected from weather
- Seating to be covered
- Flexibility to enable events, markets, performance etc
- Distinctive design
- High quality materials
- Have a clear relationship with the space

607. Based on the size of the square, the proposed landscaping approach and the inclusion of a canopy, the space provides the right conditions to act as an important focal point to the development. Although the square will feel different to the existing, being surrounded by taller buildings and overlooked by residential properties, the square is designed to be an inclusive, accessible public square. The extent of hard surfacing provides for versatility of use and the introduction of large stature trees will improve the quality of the space and link it visually to the tree lined routes which connect to it. Although the surrounding buildings and flats will create more overshadowing and overlooking than experienced at present, good levels of sunlight and daylight will still be achieved, and the new residents introduce passive surveillance, increased use, and vibrancy to the location improving its safety. The use of strong shape and colour in the paving, street furniture and a suitable canopy design will act to create a distinctive and lively public space. The success of the scheme will depend on the careful selection of paving material including layout and integration with the paving along connecting routes. It is recommended that these matters along with street furniture, lighting and the canopy are secured through the imposition of appropriate planning condition(s).

608. **St Georges Gardens** – A formal public garden is proposed alongside the N-S route running through the site, located between outline blocks E and H. This linear feature is approximately 7.8m wide and 51m in length. The feature would include a meandering path, seating and play features all set within flower rich perennial planting and tree planting. The western boundary of the space could be bounded by the proposed segregated cycleway and the eastern boundary by the residential frontage of block H, and private amenity spaces of the ground floor units of this block.

609. The council's landscape officer has commented that this feature will improve the quality of the streetscape. The garden is proposed between blocks H and E, both 7 storeys and block G to the south extends up to 8 storeys. These adjacent blocks will impact on levels of sunlight at street level, which may discourage the use of individuals/groups for extended periods. However, the space will feel like a welcome green space within the development and the inclusion of seating and play features will promote positive use and natural surveillance will add to a feeling of safety.
610. **Stump Cross** - The area around Stump Cross on Magdalen Street will play an important function in terms of pedestrian movement and access to public transport. This part of Magdalen Street, extending under and to the south of the flyover has been identified as a potential 'mobility hub', the design and specification of which would be informed by the county council and in consultation with the bus operators. Therefore, at this stage, detailed landscape proposals do not form part of this application. However, work has commenced on a mobility hub scheme which would include improved bus stopping and passengers' facilities and public realm enhancements, including to land under the flyover. The existing condition of the pedestrian environment is poor and passenger and bus stopping facilities are substandard. Land underneath the flyover blights the street scene and discourages people from visiting Anglia Square and the northern part of Magdalen Street. Promoting positive use of the land under the flyover, through enhanced surfacing, seating, lighting, and access will improve safety and deliver significant benefit to both the conservation area and the functioning of this important shopping street. In the event of planning permission being approved, the S106 includes a requirement for a public realm scheme delivered by the developer for under the flyover in phase 1 of the development and a condition recommended by the highway authority requires improvements to public transport facilities/environment.
611. **Other focal spaces** - The junction of the N-S and E-W routes provides an opportunity to acknowledge a busy location and create a special sense of place. A paving approach similar in colour to Anglia Square is proposed for the entrance space to block D, utilising linear bands of yellow/black coloured paving aligned along the street. A location for public art in the centre of this space has been identified and this would help to provide a focal point. This would be secured by planning condition.
612. **Streets** - The spaces described above would be linked via the two principal routes running through the site as well as secondary routes. These routes are car free other than for emergency access. The pedestrian space on the adopted roads surrounding the site would be widened. The internal routes and widened street frontages would be surfaced using a pallet of pavers of differing size and colour. The primary routes are the widest routes ranging in width between 9.5 – 18m. These are proposed as green, multifunctional streets and are shown as lined with street trees, with underplanting, seating and cycle parking. The E-W route is referred to as Botolph Street. The N-S route (referred to as St Georges Street) includes a segregated cycle lane. Both principal routes would require measures to prevent unrestricted vehicular access. In the event of planning permission being approved the details of such access restrictions including those that mitigate the risk of hostile vehicle attack would be agreed through the imposition of a planning condition. The secondary routes are narrower, largely ranging in width between 5.7 – 11.5m. These are presented as 'lanes', to be surfaced in smaller scale

paving material, reminiscent of historic Norwich Lanes. These routes also include soft planting within the street and enclosing private amenity space for ground floor residential units.

613. **Botolph Street** - This important E – W street would be a largely commercial thoroughfare. The width of the street varies between 10 -13m. The street would have a layout based on a series of central rectangular planting beds and associated seating and/or cycle parking. Each planter would have a pair of trees, creating a row along the length of the street. The Street would have a continuous shared surface of small-format concrete block paving. The revised LMP shows a 'wall to wall' coverage of concrete block material. The council's landscape officer has indicated that a larger format may be more appropriate for a pedestrian street and that a more subtle and varied approach to paving should be taken at a detailed planning stage. In the event of planning permission being approved such detailing would be secured through the imposition of a planning condition. Given the alignment of this route and the height of blocks proposed on the southern side of the street, sunlight levels would be limited. However, such environmental conditions are not atypical of city centre locations. The proposed tree planting along the street would be a positive feature and if off-set from the mid- centre would contribute to views along this route of St Augustines church.
614. **St Georges Street** - This important N – S street is essentially a residential street with a major pedal way running through it. Access would be restricted to pedestrians/cyclists and emergency vehicles. Provision of a dedicated cycle path would separate pedestrians and cyclists. The cycle route would be 3m in width and the pedestrian varying between approx. 2.7m and 3m. The Parameters plan indicates widths for St Georges Gardens of 18-20m, St Georges Street north 9.5-15.3m, and St Georges Street south of 15-18m. Particularly south of Botolph Street, the combination of St Georges Gardens, tree and hedge planting and residential gardens will positively contribute to the green character of this route. Although the buildings either side of the route will have significant height, the overall width of the route, car-free conditions and the landscape approach will create appeal and promote positive use.
615. A further route which should be noted is that running along the southern boundary of the site and parallel to the alignment of the flyover, referred to as Cherry Lane. This provides pedestrian and cycle access through to Magdalen Street and for part of the route, vehicular and service access for blocks G and J. Both blocks are shown as having residential frontages and it is anticipated that small private front gardens would align a good proportion of this route. The existing landscaped area adjacent to St Crispins would be reinforced with additional planting and with the use of good quality paving materials the route would function as a valuable safe route for pedestrians and cyclists.
616. **Secondary routes** - Within the detailed part of the site these include Annes Walk (between blocks M and KL), and Beckham Place (between blocks A and M). Within the outline: Tooley Lane (between E and F), Sovereign Way (between blocks H and G), and Calvert Yard (between blocks G and J). Within the detailed part of the application these routes would be fronted principally by commercial premises. Beckham Place the wider of the two routes would include street planting set within planted beds. The routes within the outline will be fronted principally by residential blocks. Landscaping of these routes will be subject to future reserved matters application(s) however the landscape masterplan indicates that these

routes will include private front gardens of residential properties, low level planting within the public realm and tree planting at either end of the route, providing focal point to these routes. Tooley Lane and Sovereign Way, in common with other E-W routes within the site, will have limited direct sunlight at street level given the width of these routes and scale of adjacent blocks. However, the selection of good quality paving material and appropriate planting will provide visual interest. These routes will include active ground floor uses which will offer passive surveillance and given limited length and good forward visibility they will perform a valuable means of moving through the development. Shortcomings in the daylight and sunlight levels must be weighed against the benefits of achieving a high degree of permeability which is a characteristic of Norwich's historic centre.

617. **Street frontages** - Edward St, Magdalen St and Pitt Street. It is proposed that on all three frontages the building line will be set back behind the existing highway boundary. This set back would provide space for pedestrians, service bays, street tree planting and for bioretention SUDs features. Edward Street would include a zone of around 6.5m for these purposes, Magdalen Street around 5.0m and Pitt Street between 4-10m. This set back and the proposed soft planting will mitigate to some degree the scale of buildings along these frontages. The planting beds are of sufficient width to allow for tree planting and drainage swales which will help mitigate air pollution and noise from traffic and contribute to streetscape. The applicant has indicated their intention to offer these new areas of public realm for adoption by the local highway authority. It will be essential to ensure that suitability high quality paving materials are used along these frontages and that such materials are adopted by the highway authority.

Roof level landscape masterplan

618. The roof level masterplan includes three layers:
- Podium gardens – for communal use by residents
 - Roof terraces – for communal use by residents
 - Green roofs - for purposes of SUDs and biodiversity enhancement.
619. **Podium Gardens and roof terraces** - Podium gardens are at a raised level and would be shared semi-private multi-generational spaces with a mix of paving areas, play spaces, grass areas, seating, as well as planting and trees. They are located at Levels 1 or 2 within blocks A, M and KL and are likely to feature in outline blocks E/F, G and J. A margin of the podium space would be utilised as private amenity space for flats that directly front these spaces. This will add to activity levels within the space and provide a degree of surveillance for wider communal use. Soft landscaping relies on the podium deck supporting a variety of planters with varying planting depth. This will allow the planting of trees, hedges, and perennials as well as the establishment of lawns, shrubs, and hedges. Communal roof terraces are integrated into the design of blocks D and K/L. These paved spaces including soft planting and seating and offer scope for views across the site and wider city. In terms of sunlight levels and BRE guidance, the principal podium gardens and roof terraces serving blocks A, KL, D, M would all exceed the 50% minimum guidance and, except for block A, between 70-100% of these amenity spaces would receive more than 2 hours of sunlight on 31 March (BRE guideline).

620. Although the podium gardens would be enclosed by buildings and overlooked, the gardens should feel owned and a private facility for the resident community of each block. The landscape treatment of both types of roof gardens along with good levels of sunlight should enable the gardens to function as safe and accessible amenity areas and a space where neighbours can interact and socialise. In the event of planning permission being approved it is recommended that further details be secured of podium/terraces planting systems to ensure satisfactory conditions for a multi-layered planting scheme, as well as full details of irrigation, maintenance, and management of these spaces.
621. **Green roofs.** Green roofs are proposed for blocks A, B, C, D and K/L totalling 2701sqm. The landscape masterplan indicates the scope for elements of green roofs on all outline blocks amounting to approximately 4685sqm.
622. Two types of green roof are proposed:
- Extensive green roof of pre-grown wildflower blanket on lightweight substrate.
 - Extensive green roof of pre-grown sedum mat on lightweight substrate.
623. System A is proposed on parts of Block A, B, C and K and offers SUDS and good biodiversity benefits. System B is a monoculture offering SUDs as well as some limited biodiversity benefits.
624. The inclusion of green roof at the scale proposed is a positive feature of the landscape strategy for the site. It is recommended that full details of the systems and that of management and maintenance is secured by planning condition.

Play Strategy

625. The LS includes a Play Strategy (PS). This describes an approach whereby play is integrated within the design of the landscape scheme. The PS is based on the concept of a Play Trail which aims to provide non-prescriptive play items along routes, beginning on the surface, rising up to furniture items, and culminating in sculptural play features. This strategy would mean that play provision would be focused on streets and public realm areas as well as some local provision within each of the podium gardens and with the communal garden of block C. The concept behind the play trail is based on the idea of movement through the site, with play mainly involving balance and movement. These movement trails would follow St Georges Street and Botolph Street and direct people towards nearby play areas at Gildencroft Park and St Leonards Street.
626. The concept of a play trail is supported but in the event of planning permission being approved a detailed play scheme will need to be secured through the imposition of a condition. Provision needs to be sufficiently varied to enable a genuine choice and variety of play experience for different ages, allowing for a range of different activities to maximise play value.

Lighting Strategy

627. An external Lighting strategy is described in the LSA (6.4) which aims to provide a safe and inclusive environment. The Strategy indicates column lighting for key movement routes such as Botolph Street, bollard lighting for Lanes, and building mounted lighting around the edges of the proposals. There would also be areas

of feature lighting to add interest at gateways and within Anglia Square itself. This includes feature columns and integrated furniture lighting. The general approach is accepted. However, bollard lighting alone may not provide sufficient light levels for the Lanes and there will be a need for the wider scheme to be informed by consideration such as minimising light pollution and adverse ecological effects. In the event of planning permission being approved a lighting condition is recommended to secure full details.

Proposed Surface Water Drainage Strategy

628. The main elements of the strategy are:

- Green roofs: these provide water quality and biodiversity benefits.
- Bio-Retention planters /systems: These are shallow landscaped depressions that can reduce run-off rates and volumes and treat pollution. They are proposed for the planted areas in between Block E and Block H; in between Block D and Block A; in between Block F and Block G; within the courtyards of Block F and Block H and along the western site boundary. Surface water run-off from adjacent hard surfaces would be directed to these swales, providing a first stage of attenuation and treatment of run-off. Swales along the western boundary of the site which would collect surface water run-off from Botolph Street would form part of the highway drainage network, and as such would be subject to S278 Agreement with Norfolk County Council. The swales would be positive features for streetscape and biodiversity.
- Tree planting: Bio-Retention tree pits/planters are proposed along the main thoroughfare crossing the site from west to east – in between Block A and Block H and in between Block J3 and K/L. Run-off from surrounding hard surfaces would be directed to these tree pits with overflow directed to the wider surface water drainage system. As well as sustainable drainage, proposed street tree planting would deliver amenity and biodiversity benefits.
- Pervious Pavements: Pervious surfaces, along with their associated substructures, are an efficient means of managing surface water runoff close to its source – intercepting, reducing the volume and frequency of runoff, and providing a treatment medium. Use of such paving is supported and is encouraged throughout the development. Areas of permeable block paving are proposed across the site: The access road and parking areas for Block B and car club parking area in the north of the site; the forecourt of Block F; and the hardstanding areas to the south of and in between Blocks G and J would all have permeable paving attenuation.

Biodiversity and Planting

629. DM3 i) requires development to create biodiversity-rich through the design of built structures and landscaping, the latter to include the use of native plant species, and link new areas of wildlife habitat to the existing network of habitats.
630. The NPPF paragraph 174 d) requires the development to contribute to and enhance the natural environment by minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

631. Biodiversity net gain (BNG) is a way to contribute to the recovery of nature while developing land. The Environment Act 2021 contains a new BNG condition for planning permissions and from November 2023 (April 2024 for small sites) local planning authorities are required to approve BNG plans in connection with new development. From later this year a mandatory requirement of a 10% BNG (min) will apply. Until that date there is no mandatory requirement for a specified level of BNG.
632. Notwithstanding this the applicant has undertaken an BNG Assessment. The revised Biodiversity Net Gain Assessment indicates that the proposed landscaping (excluding green roofs and podium gardens associated with outline blocks) will result in 85% net gain in biodiversity (BNG) in habitat units. The area of soft landscaped/vegetated area would increase from 1,958.9sqm (0.484 acres) to 3,800sqm (0.939 acres). In addition, there will be 1.296km of hedgerow planted. In terms of the BNG metric (calculation tool), habitat and hedgerow units are separate values.
633. The current site has a low level of biodiversity at present, with the submitted metric identifying that no habitats of either very high or high distinctiveness are found on site. The proposed enhancements largely fall into the urban habitat type, with the most significant proportions of the new units because of the extensive green roofs, ground level planters and urban trees. Around 200 trees are proposed across the site including 15 different species. The final species selection will be approved at planning condition stage, and it will be important to ensure adaptation to climate change. Tree planting is shown on podiums and roof terraces which will add visual interest and increase biodiversity in these spaces, although such trees are unlikely to grow to significant stature due to site constraints. The planting of semi-mature trees is proposed along St Georges Street, and these have the scope to mature and gain stature. Those along Botolph Street and on the highway edges would be columnar in form so not to restrict highway visibility and planned vistas towards St Augustine church.
634. It should be noted that the proposed development results in several existing trees being lost. These include two adjacent to the existing car park (2 x lime species) and two London Plane trees that form part of a larger group adjacent to St Crispins Road. All are proposed to facilitate the comprehensive redevelopment of the site. The trees on St Crispins Road are proposed to be removed to facilitate the formation of the reconfigured access arrangements. During the design stage the access has been amended to minimise impact on existing trees and alternative access arrangements have been considered but dismissed given they did not provide a better outcome. The proposal includes replacement planting within this group and the formation of an additional planting zone fronting Surrey Chapel. This planting will benefit the greening of the road corridor and in combination with the new tree planting across the site, compensate for the proposed tree loss. On this basis the council's tree officer is satisfied with the proposals.
635. In terms of BNG the council's ecology adviser has stated that the approach taken to classification of proposed habitats has been a conservative one, for example the proposed bioswales have been selected as being in a poor condition to "provide a conservative approach to habitat creation". Having regard to this and the biodiversity value of landscape schemes associated with podium and green

roofs on future outline blocks, the BNG performance for the whole development will likely exceed the current calculated figure of 85%.

636. Elements of the scheme, for instance the green roofs and hedge planting could have achieved higher BNG values. For instance, by deploying intensive green roof systems that have deeper substrate would allow for a greater diversity of planting and mixed native hedgerow planting would offer greater ecological value. However, the former has significant structural cost, and the latter relies on low maintenance which is less appropriate for heavily used public realm areas. Notwithstanding this the proposed green roofs have value and wildflower blankets proposed on the lower roofs rather than the higher roofs are likely to be more beneficial to invertebrates. The council ecological adviser has welcomed their use and pointed to the other benefits of green roofs in terms of rainwater retention, air quality improvement and thermal cooling. In terms of hedges, native hedging is shown as either Box or Beech maintained at 1.2m height. Box is native and would be practical being easy to clip to neat shape. The biodiversity benefits of Beech and Box hedging would be low and there is concern that the former is susceptible to drought. Therefore, more consideration is required of appropriate hedgerow species, a wider selection that provides ecological benefits such as food as well as shelter and allows for clipped maintenance would be more desirable and is capable of being secured at planning condition stage.
637. In terms of connectivity, the revisions have increased the level of ecological connectivity both within the site and with the wider area. The improvements to St George's Street result in a more connected north-south route, with hedge and trees providing the main features of benefit. Ground level planters are also found on this route. This route will help some species to move across the main site and access soft landscaping beyond, such as that proposed in Block B. Both east-west routes from Anglia Square to the edge of the main site would allow some movement of species here too, in particular the northern route. The increase in soft landscaping from Rev B along Pitt Street would improve the link with Gildencroft Park for both routes. Trees are shown to the north of Anglia Square, and it is important that species selection supports the ecological network.
638. The landscape revisions have resulted in a scheme which would provide for a variety of habitats delivering a significant BNG and with appropriate conditions would provide a variety of habitats which should serve to support and increase the wildlife in the area. It is important to secure the use of an appropriate mix of species for all types of soft planting. Detailed planting schedules for the podium gardens have yet to be provided and planting within the highway will need to be specified to meet the highway authority requirements for visibility. However, the schedules provided are encouraging and would create attractive planting which is suitable to the street level conditions and offers ecological benefits. Conditions will secure appropriate species and future management and maintenance. The council's ecological adviser has also recommended conditions in relations to recommendations set out in chapter 6 of the ES March 2022, details of species, specific boxes etc, small mammal fences; Clearance and BNG credits not being sold.

Assessment of landscape proposals against policy requirements

639. As referred to in paragraph 596 there are number of development policies that relate to landscape matters:

640. DM3 – In relation to delivering high quality design DM3 proposals requires all new development to make appropriate provision for both the protection of existing and the provision of new green infrastructure as an integral part of the overall design which complements and enhances the development. Furthermore, where reasonably practicable, provision should be made within developments for new and enhanced green infrastructure and for built and natural features which help to: safeguard wildlife habitats and create a biodiversity -rich environment.
641. DM8 – relates to open space and recreation and requires all development involving the construction of new dwellings is required to contribute to the provision, enhancement, and maintenance of local open space either by means of on-site provision or indirect contribution through the community infrastructure levy.

It is stated that for *proposals for development on sites not already identified in the Site allocations plan which:*

- *involve the development of 100 dwellings and above; or*
 - *are on sites of over two hectares in size*
 - *will be required to provide for informal publicly accessible recreational open space on-site as an integral part of the overall design and landscaping of the development. The space provided should be of an appropriate form and character to allow for meaningful use and will be additional to the requirements for site landscaping and green infrastructure set out in policy DM3.*
642. 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 open space and structural planting).
643. DM2 - relates to external amenity requiring provision for external private or communal amenity space which is appropriate for and integral to the residential development and forms a key part of the overall design of the site.
644. In addition as referred to under Main Issue 3 the adopted GIRAMs strategy requires the provision of green infrastructure to meet informal recreational needs arising from new development as a means of deflecting visitor pressure from sensitive protected sites. Draft GNLP policy 3 requires the provision or enhancement of adequate green infrastructure, either on the development site or nearby and that this will equate to a minimum of 2 hectares per 1,000 population and will reflect Natural England's Accessible Natural Greenspace Standard
645. Turning firstly to DM8 open space and recreation, the development comprises a site of 4.65 hectares and up to 1100 new dwellings. The landscape strategy makes no provision for a large on-site green open space. The Open Space and Play SPD acknowledges that for high density flatted schemes and for development within the city centre, alternative more urban design approaches may be more appropriate. The landscape strategy for the site is one that makes provision for public realm at street level and the creation of car-free spaces which provide amenity and recreational value. Public realm areas supporting soft landscaping and elements such as seating and play features amounts to 8657sqm, 20% of the total site area. Given the city centre location of the site and

the need for development on this site to contribute to the function of the Anglia Square and Magdalen Street Large District centre, a public realm led approach is considered appropriate. 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. The council's landscape officer considers that the public realm will provide this function and that for a city centre site the main routes and spaces will deliver an enhancement to the green infrastructure of the city.

646. In addition, in terms of recreational opportunities for new residents, the site is well located in relation to other city parks and green spaces. Proximity to Marriotts Way, Wensum, Gildencroft and other parks has already been referred to in paragraph 274 of the report in the assessment of the development against GIRAMs requirements. New residents will have access to these spaces, and it is proposed that the development will fund enhancement of both Gildengate and Wensum parks.
647. In relation to DM3 and DM2 – as well as the landscaping embedded within the public realm, green infrastructure is integrated into the SUD scheme for the site, the design of communal amenity spaces and in the roof treatment. The area of the detailed blocks proposed for podium gardens, roof terraces, green roofs and courtyards totals 7200sqm. The landscape masterplan for the outline blocks indicates scope for around 9332sqm. Taken in combination with public realm areas, this equates to a total area of 26, 461of land/buildings including green infrastructure features, 56.9% of the site area. Although this total includes consideration of a multi layered landscape approach and green features which may not all be visible to the general public, nor always accessible, it illustrates the manner in which the development seeks to optimise GI provision on this city centre site. The suite of GI measures delivers multiple environmental benefits, biodiversity net gain and amenity benefits to both the new resident community and the wider public.
648. On this basis the landscape proposals are considered to be in accordance with the following development plan policies: DM2, DM3 and DM8.

Main issue 9 Amenity

649. Key policies and NPPF paragraphs – DM2, DM11, NPPF paragraphs 9 and 17.
650. 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.
651. The proposed height, massing and density of the development raises several amenity considerations. 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.

652. Height and density also raise issues of overlooking resulting from close proximity between blocks.
653. A number of representations have raised an objection to the scheme on amenity grounds. The objection from the Norwich Society states that the development will not provide the standard of residential environment that should be expected referencing the number of units that are single aspect and as a result of orientation will receive little direct sunlight.
654. The application is accompanied by sunlight/daylight assessments. These assessments consider both the impact of the development on existing properties located close to the site and conditions within the development site. The Building Research Establishment (BRE) set out guidelines and methodology for the measurement and assessment of daylight and sunlight. These include the methods in the table below which have been employed within the assessments.

Measure	Method	BRE Recommended targets
Daylight quantum	Average Daylight Factor (ADF)	2% for rooms with kitchens 1.5% for living rooms and 1% for bedrooms.
Daylight distribution	No Sky Line (NSL)	at least 80% for the room to guarantee satisfactory daylight uniformity.
Daylight distribution	Room depth criterion (RDC)	Defines adequate room proportions that enable good distribution of light. MET/NOT MET
Sunlight	Annual Probable Sunlight Hours (APSH)	At least 25%
Sunlight	Winter Probable Sunlight Hours (WPSH)	At least 5%
Daylight/sunlight	Vertical Skyline Component (VSC)	The maximum potential VSC for unobstructed sky view is marginally under 40%. The BRE suggests a target of more than 27%

Extent of overshadowing resulting from the development and the impact on the amenity and working conditions of neighbouring residential properties and business

655. 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 amenity of the area or the living or working conditions or operations of neighbouring occupants.

656. In terms of the main site, there are two immediately adjoining buildings which do not form part of the managed shopping centre, 100 Magdalen Street (former Dersh) and Surrey Chapel.
657. 100 Magdalen Street is a two-storey commercial building falling outside of the application boundary and in third party ownership. This building currently forms part of the large mixed-use shopping centre block fronting Magdalen Street. The principal glazed frontage of this building fronts the 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. The site is the subject of a current planning application ref. 21/01655/F which proposes demolition and redevelopment with a 4 storey mixed use development comprising commercial uses at ground and basement level and 13 flats on upper floors. Block M proposed to the rear, ranges in height between 2-4 storeys adjacent to the party ownership boundary and off set between approx. 1.2-1.75m. The proposed eastern façade has no window openings other than in the southern corner where a window is proposed on each floor to provide light to a communal residential stair core. At second floor level of block M, a communal residential podium garden is proposed, this would extend across part of this boundary. Block L, proposed to the south 100 Magdalen Street in 4 storey and off set from existing adjacent building by approx. 9m. North facing windows are proposed at upper levels serving residential bedrooms and living rooms (secondary windows). Officers are satisfied that blocks M and L have been designed not to unduly prejudice development of the adjacent site.
658. 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 (amended July 2022) which assesses the impact of the proposed development on these neighbouring buildings. 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. When looking at impact, in general a change in value of more than 20% is considered to be noticeable by occupiers.
659. 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 predict 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.
660. In relation to the impact on adjacent residential properties, there are three particular locations to consider. Firstly, the impact of block B development on

residential properties on St Leonard Street, Secondly the impact of block C on Dalymond Court and Beckham Place and thirdly the impact of block A on Dalymond Court and 8-22 Edward Street.

661. Block B and St Leonard Street. Block B development include a terrace of 2 bed houses running parallel and to the south of 16 – 46 St Leonard Street. The proposed terrace is a min of approx. 7m from the boundary, 11m from outriggers to the rear of the existing terrace and 15m from the main two-storey rear façade. Of the 16 assessed properties 14 remain BRE compliant for daylight and sunlight in that although there is impact the degree of impact is below 20%. For two properties 24 and 28 Leonard Street the assessment shows that windows would experience more than a 40% change in the Annual Probable Sunlight hours (APSH). Although the change may be noticeable, both windows would still exceed the APSH BRE target value of 25% of annual probable sunlight hours. With interface distances of approximately 15m between made facades, levels of overlooking are comparable to city centre locations.
662. Block C and Beckham Place. Block C comprises an irregular L shaped block ranging in height between 3-4 storey on a site currently used as surface level parking. The proposed 3-storey leg runs parallel to 4-10 Beckham Place, 2.5 storey residential properties (with accommodation in roof space). The proposed development is off set from the site boundary by between 6-8m and from the rear façade of Beckham Place by 13.5-14.5m. It is relevant to note that 4-10 Beckham Place have living windows on both the ground floor and first floor levels. The assessment indicates that in terms of two of the measures of sunlight and daylight impact BRE target values are met. In relation to the Vertical Sky Component (VSC) measure of the 37 windows tested 28 would meet BRE recommendation and 9 would experience daylight alterations of between 20-27.5% and as such the change would be noticeable (4-6 Beckham Place). Notwithstanding this, all 9 windows retain a VSC value of circa 20%-26% and above, which although below the target of 27% are not unreasonable values for a city centre location. With interface distances of approximately 14m between made facades, levels of overlooking are comparable to city centre locations.
663. Block A/D and 8-22 Edward Street and Dalymond Court. Both 8-22 Edward Street and Dalymond Court comprise 4 storey blocks of flats located tight against the adopted footway on the Edward Street frontage. The frontage of 8-22 Edward Street comprises living room and bedroom windows serving 8 flats. Each flat has a balcony sited on either of the two corners of the block. The balcony is accessed via a glazed french door leading from an open plan living/kitchen/dining area. Each open plan area is served by 2 additional windows. In the case of 4 flats these additional windows are sited on the Edward Street façade. The Edward Street frontage of Dalymond Court is less fenestrated and includes bathroom windows to 4 flats. The open plan living, kitchen/dining areas of these flats are served by a cut out balcony located on the SW corner of the block. These open plan areas are served by two additional windows, one of which faces the balcony and the other west towards 8-22 Edward Street. Other flats in Dalymond Court have projecting balconies on the western elevation of the block, with associated south and west facing windows.
664. The proposed development will introduce a built frontage along Edward Street, a major change to the existing condition of surface parking and the off-set multi-storey car park. Block A is proposed to be sited approximately 6.5m back from the

kerb edge and Block D approximately 11.5m. Block A varies in height, ranging between 4-5 storeys on the Edward Street and rising into the site to 6 storeys. The 4-storey wing of block D extends towards the Edward Street/New Botolph Street junction. The assessment has considered impact on 42 bedrooms and 24 living, kitchen, dining rooms within the two existing blocks. The assessment results show that the reduction to both daylight and sunlight levels to a number of these rooms will be noticeable, and in some cases, detrimental, having regard to target levels and the BRE guidance. The greatest impact is on the ground, first and second floor flats with windows either on or just set back from the Edward Street frontage. Ground floor flats within 8-22 Edward Street experience a change in VSL of between 29.9-37.2% within living rooms and between 35.5-37.2% within bedrooms. In terms of NSL the BRE target is met for the open plan living rooms but not for one of the bedroom windows. For APSH the target is met other than for 1 open plan living room. Within Dalymond Court the change for the ground floor living room is 62.4% and bedroom 30.1%, the NSL target is met for living room but not the bedroom and to both rooms significant change in APSH that is sunlight particularly in the winter. These locations represent the greatest impact in each block, the impact reduces for flats on upper floors and with increasing set back from Edward Street. But the impact remains significant for flats at first and second floor on this frontage.

665. In assessing this impact there are a number of considerations. Firstly both 8-22 Edward Street and Dalymond Court face 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 within these blocks have glazed windows providing access to external private verandas/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. Thirdly the relative position of each block to each other causes light obstruction particularly to the west façade of Dalymond Court. Furthermore, given the proximity of the blocks to the road frontage privacy screening has been erected to enclose ground floor amenity space. These factors increase the sensitivity of these blocks to development which may cause any additional over shadowing or light obstruction.
666. 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 both 8-22 Edward Street and Dalymond Court and quality of outlook will also be affected to some degree, although this is considered very poor now in any event. As described, the 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 the overall impact of the development on the two blocks – that is of the 66 rooms assessed, 30 would meet the BRE guidance for VSC, 53 the NSL target and 56 the APSH target.
667. Given the design and characteristics of 8-22 Edward Street and 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 has previously 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 and is therefore considered acceptable.

Future internal light levels and living conditions for future occupiers of the residential flats

668. The Daylight and Sunlight report (D&SR) also assesses future internal light levels in relation to flats within block A, B, C, D, M, KL and J3 (full elements of the hybrid application). With reference to table (following paragraph 655) three assessments methods are used: ADF, DDR, APSH as indicators of predicted levels of daylight and sunlight for future occupiers. For the outline part of the site daylight and sunlight potential assessments have been undertaken on the block facades using VSC and APSH methods. Each amendment stage of the application has included an updated D&SR.
669. Internal daylight and sunlight levels are affected by a number of factors including: the layout of the development, the proximity and height of blocks, orientation, the configuration of individual units and external façade design (in particular window size and the size and position of balconies).
670. In terms of internal configuration, around 46% of units within the detailed part of the development are single aspect units (54% dual aspect), having three internal walls and one external wall. Based on the parameters for the outline blocks it is predicted that around 49% of units are likely to be single aspect. Single aspect units achieve a high degree of thermal efficiency but dictate a deep floorplan and 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 benefit from windows. As a general principal, dual aspect dwellings are considered to offer greater scope for achieving higher standards of internal amenity – providing greater variety of outlook, the potential for through ventilation and elevations/rooms which receive variable amounts of daylight/sunlight at different times of the day. In his decision to the call-in scheme the Secretary of State referred to the use of single aspect dwellings in such large quantities (around 68 - 70%) being a significantly sub-optimal design solution. In response to this, the applicant has taken steps to increase the number of dual aspect units within the current proposal scheme compared to the call-in scheme achieving an improvement from 30% to 52%. No north facing single aspect flats are proposed.
671. The independent design review process undertaken in relation to the evolution of the current scheme highlighted amenity constraints associated with the proposed level of single aspect flats across the development. Throughout the process the DSE panel strongly advised that the number of single aspect flats should be reduced, the quality of living accommodation improved and pointed to the podium typology and massing as a causal factor.
672. Since first submission amendments have been made to the scheme to improve internal daylight/sunlight conditions to a number of the proposed units. These amendments have included: internal reconfiguration, increased fenestration, and alteration to balconies. Within the constraints of the scale of development proposed, there is very limited scope to improve the dual aspect % any further.

673. In terms of considering whether the development approach including the single aspect: dual aspect mix results in sub-optimal conditions, the findings of the Daylight and Sunlight report (D&SR) have been critically assessed. Daylight and sunlight assessment results have been considered in detail to establish the degree to which units meet, or in the case of the outline part of the application are capable of meeting BRE targets for sunlight and daylight.
674. For the detailed blocks and mindful of the factors that affect sunlight and daylight levels the D&SR focuses on the units on ground floor (00) and levels 01-03, a total of 591 rooms have been assessed. This equates to approximately 248 units, as 105 units are located at level 04 and above.
675. The latest D&SR provides an overview of the results for the detailed blocks. The results show that 78% (461) of the assessed rooms will meet or exceed the levels of ADF recommended by the BRE Guidance. A further 49 rooms whilst technically falling short, only fail marginally and so can be assumed to be acceptably lit. If these rooms and those on upper floors (04 +) are included, the detailed application would have 91.1% of rooms marginally below, meeting or exceeding the levels of ADF recommended by the BRE Guidance.
676. In terms of NSL, 58% of rooms meet the 80% target, this increases to 77% if a lower target of 50% is used (which the applicant's consultant suggest is in line with expectations in dense urban areas). In terms of RDC most rooms meet the criteria with only 13 out of the 445 failing. In terms of sunlight, only living rooms with the greatest expectations of sunlight have been assessed (windows facing within 90° of due south). Of the 157 living rooms tested 75% exceeded annual sunlight level and 73% will be well sunlit during the winter months. By omission, on floors 00-003, 91 living rooms will have restricted levels of direct sunlight. All three sets of figures referred to in this paragraph exclude dwellings at level 04 and above and in all cases % performance would be improved if these were to be included.
677. The results indicate that the vast majority of dwellings within the detailed blocks will receive satisfactorily levels of daylight. The Clarification Note (CN) submitted with the latest D&SR indicates that of the 591 rooms assessed, 23 rooms (attributed to 22 dwellings) returned results significantly below the levels of ADF recommended by the BRE Guidance. 'Significantly below' is defined in the assessment as ADF levels of less than 1 for a living room (target 1.5) and less than 0.5 for a bedroom (target 1.0). Of these 23 rooms, 18 serve living rooms and 5 bedrooms. The CN indicates that:
- A total of 18 of these dwellings have at least one other habitable room that performs well against the BRE standard.
 - A total of 12 of the dwellings have an external balcony where daylight levels will be higher and all have access to a podium garden and or roof terrace which receive good levels of daylight and sunlight.
 - The dwellings all meet National Space Standard and 8 of the 23 rooms exceed the standard including 'oversized' living rooms.
678. In judging whether these units are acceptable and whether in general the amenity standards of the proposed detailed dwellings will be of a satisfactory standard,

officers have taken account of the approach adopted to assessing living conditions at the Call-in inquiry. The Planning Inspector when assessing living conditions considered it relevant to consider living conditions in the round (paragraph 442 of his report). In judging the standard of residential accommodation, he attached weight to considerations such as: internal space standards; large floor to ceiling windows proposed across the development and access residents would have to external private and communal space. Although the Secretary of State recognised that the flats had been designed to overcome as far as possible the disadvantages of single aspect dwellings, he remained critical of the both the quantity of single aspect dwellings and the quality of the access arrangements which included long double loaded corridors often with no natural light. In relation to this scheme the applicant has taken steps to reduce the number of single aspect dwellings, limit residential corridors to serving clusters of 5-9 flats (only 1 part of block K/L exceeds this limit - serving clusters of 11) and to ensure that all corridors would have at least 1 window providing natural light. These steps are beneficial and relevant when considering the extent to which the design and facilities available within each of the detailed blocks will play a role in creating amenity benefits for residents. Adopting the approach of the Planning Inspector: all of the units within the detailed blocks would meet or exceed National Space Standards and all would have access to good quality external amenity space and in most cases private amenity space. Factors such as ease of access to a full range of day-to-day services, leisure/cultural activities, public transport, and employment are also material. These benefits are valued by city-centre dwellers. On this basis although it is accepted that living conditions will vary across the detailed blocks, overall levels of amenity are considered satisfactory for a high-density, city centre scheme.

679. For the outline element, the D&SR, in the absence of detailed internal layouts for the proposed flats, assesses the daylight and sunlight potential of the block façade. The Vertical Sky Component (VSC) method is used to allow a comparison against the findings for the detailed element. This enables estimates and conclusions to be drawn on the likely performance of the outline element of the scheme.

680. The table below sets out results:

Threshold	Outline Façade area compliant %	Detail Façade area compliant %	Hybrid Façade area compliant %
>27%	49.3	56.7	52.3
>15% and <27%	33.9	32.3	33.2
>5% and <15%	15.5	10.0	13.3
<5%	1.3	1.0	1.2

681. A total of 83.2% of the outline blocks facades achieve VSC levels within the upper two thresholds categories. As set out in the preceding paragraphs the standard of

living conditions for the detailed blocks is considered satisfactory and this is achieved with 89% of facades falling within the upper two VSC level thresholds. This comparatively modest difference is reflective of the massing and layout of the outlined blocks which include more 7-8 storey elements separated by a number of 'lanes'. A key planning consideration is whether this lower performance materially affects the ability for satisfactory living conditions to be achieved for dwellings within these blocks at reserved matters stage.

682. In terms of the outline blocks the following locations are likely to experience compromised sunlight/daylight conditions, lower levels (00,01) of: block E/F- south elevation; block H - south elevation; block G - north and east elevations; and block J - west elevation. The DSE panel also highlighted the south elevation of block EF (fronting proposed Tooley Lane) and other locations where units back on to 2 storey car park podiums. The applicant's Clarification Note states that at reserved matters stage the detailed design of the outline blocks will have regard to light conditions and that where VSC levels are lowest, these frontages will be occupied by entrances, cores, ancillary spaces, and commercial units. Furthermore, they indicate that dual - aspect and duplex typologies can be utilised in such locations to allow more light sensitive rooms to be located in the most favourable positions. Recent indicative landscape plans for these locations have indicated private gardens along some of these frontages, as a demonstration that these will contribute to the amenity value of these units. Parameter plans submitted in support of the outline element indicate land use type of the frontages of each of the outline blocks. As originally submitted residential uses were indicated at ground floor and upper levels in the majority of locations. In the absence of a detailed sunlight daylight assessment for the outline blocks, officers advised the applicant that there is insufficient evidence to demonstrate that residential uses will be acceptable in all locations originally shown. In response the applicant has amended the land use parameter plans for levels 00 and 01 to identify locations where suitability for residential use will need to be demonstrated at reserved matters stage. Where this is not demonstrated, frontages will need to include ancillary residential uses and or commercial uses/live-work units. Following this amendment officers are now satisfied that that a residential block and dwelling design can be achieved at reserved matters stage to ensure that future occupiers will experience satisfactory amenity levels.
683. Concerns have been raised by a number of objectors about dwellings overheating during extreme heatwave events in future, and whether residents would be driven towards retrofitting aircon units in the future. The scheme is compliant with the CIBSE TM59 guidance on overheating, and the modelling test results demonstrate the development performs well during extreme heatwave events with climate change allowance. For DSY2 modelling all units pass, for the DSY3 modelling 91% units pass test (a) and 99% pass test (b). The modelling assumes no shadows cast by neighbouring buildings (the modelled scenario and test results presented, when residents use the mitigation measures stated within the report (e.g. internal blinds / curtains, portable fans etc no units are expected to overheat during extreme events with climate change allowance).
684. In terms of overlooking, interface distances between blocks varies across the site. The network of primary routes generally results in separation distances of around 10-12m. This widens considerably for blocks fronting the proposed public spaces. Those blocks fronting the shorter secondary routes (between blocks E/F and F and G and H) are closer at around 9m. As referenced in paragraph 683 in these

locations suitability for residential use will need to be demonstrated at reserved matters stage. At upper levels of the detailed blocks, the podium gardens generally result in separation distances of between 20m – 40m. For outline blocks the indicative range is 15m - 38m range. Across the development, in most cases residents will have clear sight of facades with large number of windows. The relationship will not feel private but communal. However, this is expected for city centre living and the interface distances that are proposed will allow a satisfactory degree of separation.

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

685. With the exception of the houses on block B, it is proposed to meet the needs of new residents for amenity space through the provision of private balconies/verandas, and communal residents' gardens.
686. With the exception of block D, most dwellings occupying upper floors would have a private balcony of approximately 1.5m x 2.4 - 3m in size. This provides sufficient space for outdoor seating and the keeping of small-scale garden pots. Ground and podium level flats would have a defined external private amenity space, which in most cases would exceed the size of a balcony, normally extending across the full width of the dwelling. A small number of upper floor units within blocks D, A, M, K and J3 would benefit from a private roof garden. Flats in block D and small number of flats in blocks A, M and L would not have access to private amenity space. All residents would have access to a communal residents' garden serving their block. The amount of communal garden space is set out in the table below:

Communal external amenity space - Detailed blocks			
Block (units in block)	Podium garden (m ²)	Roof terrace/s (m ²)	Ground floor – residents' garden (m ²)
A (142)	899	455	-
B (25)	-	-	277
C (21)	-	-	496
D (28)	-	134	--
M (48)	610	-	-
K/L (81)	669	669	-
J3 (8)	-	169	118
Outline Blocks – indicative areas (units)			
E (180)	1550	108	-
F (123)	-	305	270

Communal external amenity space - Detailed blocks			
Block (units in block)	Podium garden (m ²)	Roof terrace/s (m ²)	Ground floor – residents' garden (m ²)
G (146)	770	-	-
H (129)	-	464	-
J (171)	853	324	-

687. Indicative information has been provided in relation to the outline blocks. This shows a similar strategy in terms of amenity space provision.
688. The detailed landscape proposals for these communal spaces are discussed in Main issue 8 of the report. However, on the basis of the quantum and location of the amenity spaces available it is considered that the scheme makes appropriate and sufficient provision to meet the needs of future occupiers and the requirements of DM2 and DM13.
689. In relation to the amenity and living conditions for proposed future residents the development is considered to meet the requirements of policies DM2 and DM13 (which relates specifically to communal development). Given the impact on existing residents on Edward Street and to a less extent those on Beckham Place the development does not full accord with DM2 and DM13 in that elements of the scheme will have an adverse impact on the amenity of neighbouring residents.

Main issue 10 Transport

690. Key policies and NPPF paragraphs – JCS6, DM28, DM30, DM31, NPPF paragraphs 104 - 113.
691. The application proposes a significant level of new development within the northern city centre. Paragraph 105 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.
692. 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 assist in addressing the harm caused by these historic schemes.

693. Highways, traffic, and transport are matters scoped into the EIA and impacts are considered in Chapter 5 of the ES. A Transport Statement has been submitted with the application as well as residential and commercial framework travel plans, and a delivery and servicing plan.

Proposed Access and movement strategy

Pedestrian and cycle access

694. 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 proposed. St George's Street is extended through the site with a connection to Edward Street on the desire line for pedestrian movement. This will connect to the St Crispins Road crossing. This N - S route will be car free and include a segregated cycle route connecting to the yellow pedalway network. A north-east to south-west route is provided roughly on former alignment of historic Botolph Street that will effectively re-establish a historic connection between St Augustine's and Magdalen Street. In addition, a number of secondary routes are proposed within the site providing a good level of permeability. Annes Walk is retained, and a new route created running parallel to the St Crispins Road and connecting to Magdalen Street. This new route referred to as Cherry Lane will provide a pedestrian and cycle access along this desire line.
695. 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 KL 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 parallel crossing is proposed on Magdalen Street, south of the flyover. This crossing will be sited on the alignment of the new Cherry Lane route and will require the relocation of an existing bus stop. All these crossings will be beneficial to both pedestrians and cyclists.
696. 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.
697. 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.

698. Proposed cycle parking is proposed at policy compliant levels. A total of 110 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 provided.
699. On the basis of improved walking and cycling connectivity the ES indicates that the development will have a minor beneficial impact on pedestrians and cyclists.

Public transport

700. There are a total of 11 bus stops within an 8 minute walk of the site serving 16 bus routes. Magdalen Street itself is a busy bus interchange providing connections to a variety of destinations. The park and ride services between Thickthorn - Norwich airport and Postwick - Sprowston all stop at Anglia Square as do all buses heading north out of and into the city.
701. When fully operational the 1100 dwellings will support a new residential population of approximately 2000. The Highway Authority have advised that bus stop/layby improvements on Magdalen Street are required as the development will significantly increase the number of potential users of public transport. These improvements will form an important component of a multi-modal Mobility Hub proposed in this location. The aim of such hubs is to offer a variety of transport modes with the aim of providing high levels of connectivity to public transport networks. The key components may include electric vehicle charging points, electric bikes, car club vehicles, journey planning display, bike parking and lockers for deliveries/storage etc. Elements of the Magdalen Street mobility hub would be provided by the developer but other elements would need to be publicly funded. The highway authority has recommended a condition requiring bus stop improvements which would consist of the improvement of existing stops and the creation of additional stops, north bound under the flyover and south bound in front of St Saviour Church.
702. On the basis of increased patronage of public transport services, the ES indicates the potential for a minor adverse impact on these services. With mitigation, in the form of a travel plan and improvements set out in the preceding paragraph, this impact is reduced to negligible.

Vehicular access and parking

703. In terms of vehicular access, the description of development table sets out proposed vehicular access arrangements and proposed car parking levels.
704. The Highway Authority has raised no objection to the vehicular access arrangements nor the wider highway works.
705. The residential parking strategy is set out in the description of development table. In total up to 450 parking spaces are proposed. Within the City Centre Parking Area, DM31 sets a maximum parking level of 1 space per dwelling (1:1). The proposed parking level equates to 0.4:1. Although car free development would be permissible in this location, the market demand for this scale of car free living is uncertain. The applicant has 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 level of parking is well below the 1:1 cap and at a level which will actively promote modal shift and sustainable living. Provision is proposed for 100% passive electric charging point provision and for disabled bays.

706. A significant impact of the proposed development is the loss of public parking from the site. There are significant environmental benefits associated with this loss in terms of actively promoting modal shift and sustainable travel. Furthermore, the replacement of commuter parking and short stay parking with residential parking with a far lower trip generation, will reduce traffic and vehicular movements in the Air Quality Management Area, this is discussed in Main issue 11 of the report. Draft policy GNLP0506 includes reference to the delivery of replacement public parking to serve the large district centre (LDC). The principal aim of this policy requirement is to ensure that parking facilities for visitors to the shops and businesses along St Augustines Street, Magdalen Street and Anglia Square are sufficient to support the vitality and viability of the LDC.
707. The applicant has submitted a car parking assessment. This describes existing on-site parking provision which total 459 spaces of which 433 are public and 22 dedicated for staff. Other off-site public car parks in the locality are identified as comprising: Magdalen St/St Saviours Car Park (212 spaces), St Crispins Car Park (74 spaces) and Colegate Car Park (105 spaces). Car park surveys were undertaken on weekdays and Saturdays during March 2022. This survey data showed that the on-site car parks had a maximum number of 245 cars parked during the weekday (at 11:45), and a maximum of 220 cars on the Saturday (at 12:45). On the same days capacity at the off-site car parks was assessed. This showed that for the majority of the weekday survey period and the entirety of the Saturday survey period, there would have been parking capacity on the local off-site car parks to accommodate the cars that were parking on the on-site spaces. The only period where this was not the case was between 10:45 and 12:45 on the weekday survey, with a maximum overspill of 33 cars at 11:45.
708. The survey also included driver interviews (458 in total) to establish the reason for parking in that location. This survey indicated that 61 (13%) were parking to visit the city centre and 113 (25%) were commuters, parking and working in the city centre. On this basis around 62% of the on-site parking is used by visitors for other purposes, including visiting the LDC. The assessment concludes that the loss of on-site parking would not be detrimental to the LDC as there is sufficient capacity in other local car parks for these visitors. In terms of commuters and shoppers to the city centre there are alternative car parks and park and ride services.
709. Establishing this capacity allows for a reduction and rationalisation of the car parking within this part of the city and for better use to be made of the remaining provision. The development supports sustainable travel through the enhanced facilities and access for pedestrians, cyclists and bus users and makes provision for up to 5 car club vehicles on a dedicated site. It is also proposed that a bay on Edward Street would be available for 20minute parking.

Traffic impact

710. The Transport Assessment (TA) submitted with the application indicates that the development will result in a highway benefit through the reduction in vehicular movements by removing public car parking located on the site. The quantum of proposed residential parking spaces will generate fewer vehicular trips and as such the development will generate less vehicle movements compared to the extant uses available.
711. In terms of other vehicular movements. Given the proposed quantum of commercial development is lower than existing levels, deliveries and servicing requirements are likely to be proportionally reduced. Provision has been made for servicing via the provision of a delivery /loading area within Block M and service bays on all road frontages. The introduction of a new residential population to the site will introduce new servicing and deliveries requirements - e.g. refuse collections, parcel deliveries, taxis etc. These vehicles are already using the local highway network and the service/loading bays on Pitt Street, Edward Street and Magdalen Street will provide suitable waiting facilities. The number of parcel deliveries has the potential to be significant. The proposal indicates that all parcel deliveries would be received by the on-site residential management office, housed in the proposed community hub facility in Block D should allow multiple deliveries to be made simultaneously and quickly.
712. The applicant has submitted a Refuse Collection Strategy to demonstrate how this operation would be effectively managed particularly given the volume of waste and the aim of St Georges Street and Botolph Street being kept free of regular servicing traffic. Most blocks have or will be designed to have bin stores fronting the highway, close to a convenient collection point or service bay. The strategy would rely on weekly collections, on site management arrangements and the movement of bins within the larger blocks and from Blocks H, K/L and J3 to blocks with direct access to on-street service bays. On relevant collection days, bins would be positioned (where necessary by on-site operatives) in stores adjacent to service bays and would be collected and returned to that store by the bin collection operator. This strategy should avoid disrupting traffic on surrounding roads and bins being stored on the highway awaiting collection. In the event of planning permission being approved this strategy would be secured through the imposition of a planning condition.

Construction Phase

713. Traffic generated during the demolition and construction phases is likely to be significant. The Transport section of the ES indicated that it is expected that construction vehicles will utilise A roads available within close vicinity, and only use the local roads where necessary to complete the final part of their route. Based on similar projects the estimates of daily vehicle numbers have been provided. It is indicated that the number will vary from phase to phase, build out rates and other infrastructure activities. For phases 1 and 2 an average daily vehicle number of 40 is estimated but could range from 5 – 50. For phases 2 and 3 an average of 40 is estimated but a range of 10-55. In the immediate vicinity of the site this traffic will be noticeable and disruptive but in the wider locality the ES indicates the potential impact of construction of the locality as temporary, negligible, adverse.

714. The Highway Authority have advised that a Demolition and Construction Traffic Management Plan will need to be submitted and agreed prior to the commencement of development along with arrangements for parking for construction workers. On site traffic management arrangements would also fall within the scope of the Construction and Environmental Management Plan (CEMP). With these measures in place the ES indicates the impact of construction traffic on the locality as negligible.
715. For the duration of the demolition and construction period all traffic associated with the development would be required to comply with the Demolition and Construction Traffic Management Plan and use only the 'Demolition and Construction Traffic Access Route' and no other local roads, unless approved in writing with the Local Planning Authority, or as directed (without written approval) by the Emergency Services, Highway Authority, Statutory Undertakers or other body authorised to direct traffic.

Overall conclusion

716. In terms of vehicular traffic impact, the ES indicates a minor beneficial impact. The highway authority has raised no objection to the proposed development and commented that the application offers improvements to the surrounding highway, benefiting both residents of the development and the wider community and promotes the use of active and sustainable travel. They recommend the imposition conditions to secure off-site works on a phased basis, travel plans and public transport improvements. Off-site works have been subject to on-going discussion with the applicant and there is sufficient agreement for the details of these works to be agreed at planning condition stage.

Main issue 11 Air quality

717. Key policies and NPPF paragraphs – JCS1, DM11, NPPF paragraphs 103, 181
718. 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.
719. The Anglia Square PGN states in paragraph 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.
720. 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.

721. 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 Air Quality Assessment (AQAs) which was updated in July 2022 with additional monitoring data.
722. The AQA utilises local monitoring data and dispersion modelling to estimate the nitrogen dioxide and particulate matter pollutant concentrations and their compliance with Air Quality Strategy objectives at relevant receptor locations.
723. In relation to nitrogen dioxide the assessment utilising data from NCC existing diffusion tubes sites supplemented by additional monitoring undertaken at nine locations (monitoring period November 2021 – April 2022). Results from these additional locations were bias corrected and annualised to give an estimate of NO₂ concentrations in 2019. This year was chosen as the base year as it is deemed to be the last 'normal' year prior to the impact of Covid-19 which affected traffic levels and emission levels across the city.
724. NO₂ pollutant concentrations have been predicted using modelling software which provides an estimate of future air quality. 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. It should be noted that based on the conclusion of the Transport Assessment that the development will not result in any increase in traffic on the surrounding road network, the modelling takes out of future network traffic forecasts only – these forecasts include traffic levels associated with the operation of the existing site.
725. Air quality was a matter considered in detail at the 2020 call-in public inquiry. The detailed methodology of air quality assessment was subject to examination including the question as to whether the modelling should factor in anticipated changes in vehicle emissions through the use of the Emission Factor Toolkit (EFT) provided by Defra. In relation to this latter question the planning inspector considered that it was appropriate for the AQA to include a scenario whereby the impact of government policy on vehicle fleet emissions and background concentration is applied – this scenario is referred to as “with policy applied”. The Secretary of State did not question this approach.
726. 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

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

- (1) Whether the development has had sufficient regard to the Air Quality Action Plan in the scope of the mitigation measures proposed.
- (2) What implications do the AQA findings have for the development – particularly in relation to the proposed location of residential dwellings.
- (3) Impact of the construction of the development on air quality.

728. In terms of (1). The proposed development will result in the removal of around 451 in-use public car parking spaces from this location (plus additional 721 spaces if account is taken of the closed MSCP). The current surface level car parks are used as long stay commuter parking and by visitors to the Anglia Square centre/wider centre. The application proposes a maximum of 450 parking spaces the majority of which (min 95%) will be used by residents. This level is more than 50% lower than the maximum set by DM31 for this part of the city. This level and type of parking compared to the existing will result in fewer vehicular movements within the AQMA. Provision is proposed for 100% passive electric charging point provision. The application proposes improvements and facilities that will promote sustainable travel by both residents and visitors. These features of the development will support the objectives of the Air Quality Action Plan.

729. In terms of (2). The modelling data (both with and without policy applied) shows that in most locations estimated NO₂ concentrations are well below the statutory target limits. This reflects the proposed development approach, in which on the main road frontages the majority of dwellings are located on upper floors. NO₂ concentration reduce as height above road level increases.

730. At ground levels there are 4 locations where 'without policy applied' the estimated levels fall above 40 µg/m³. These are set out in the table below:

Block	2019 Baseline	2034 Without Policy Applied	2034 With Policy Applied
C	52.5	52.8	34.6

Block	2019 Baseline	2034 Without Policy Applied	2034 With Policy Applied
K/L	39.7	40.0	26.0
M1	46.3	46.6	30.5
M2	56.2	56.4	37.2
C – first floor	30.5	30.7	20.6

731. In relation to Blocks K/L and M – proposed ground floor uses are non-residential. In both blocks the lowest residential floor is at level 1, where concentrations fall below $27.5 \mu\text{g}/\text{m}^3$ (Without Policy Applied) and are therefore below statutory target limits.
732. Block C consists of a four-storey residential block. The block is L shaped aligned with Beckham Place with the shorter arm running parallel to the Beckham Place development to the rear. The block therefore avoids a long frontage on to Edward Street which is a busy bus route. The side wall of the closest ground floor dwelling is largely off-set from the road frontage apart from 1 living room window (1 of 4 to this room). This offset, along with the proposed boundary enclosure along this frontage will assist in mitigating impact. However, although forecast levels are well below statutory limits 'With Policy Applied', given block C is proposed in phase 1 it is considered precautionary that in the event of planning permission being approved, to condition the single directing fronting window to be a fixed unit. This condition would not be applied to the flat above given the fall off in NO_2 concentrations (see table above).
733. In terms of PM_{10} the results also show that there are no estimated exceedances of the daily mean objective of $40 \mu\text{g}/\text{m}^3$, with all ground floor locations falling below $19 \mu\text{g}/\text{m}^3$.
734. The submitted AQA states that based on the ADMS results for the 'With Policy Applied' scenario, no mitigation is required to reduce residents or employees' exposure to air pollution as the air quality strategy objectives are estimated to be met by at least 10% at all residential locations. The applicant's consultant recommends that in one location (the frontage of block F) further air quality monitoring be undertaken. This is considered precautionary given the proximity to the roundabout junction and the elevated NO_2 levels recorded by the applicants own monitoring. This additional monitoring to be undertaken prior to the commencement of that phase (currently proposed as phase 4) would allow the need for mitigation to be more actually determined at that time. Martin Cranfield Associates Ltd have reviewed the AQA on behalf of the council and is satisfied with the conclusions.
735. In terms 3). The ES includes a chapter describing the demolition and construction stages the development. The air quality and noise chapters of the ES assess the impact of these stages. In the event of planning permission being approved development would commence early in 2023 with demolition and construction

likely to be taking place continuously over an 8-year period, albeit at different levels of intensity. The demolition process is likely to include the recycling of material for re-use on site. This would involve the on-site crushing of the material for which an environmental permit would be required.

736. A draft Construction Environmental Management Plan (CEMP) has been submitted with the hybrid planning application. The CEMP sets out the strategy, standards, control measures and monitoring procedures that will be implemented to manage and mitigate any adverse environmental effects of the demolition and construction process, including mitigation measures defined by the ES. The intention is that the CEMP would remain a live document to ensure that it is specific to the works and processes that are to be employed during construction site activities. The CEMP includes details on roles and responsibilities, control measures and activities to be undertaken to minimise environmental effects, as well as monitoring and record-keeping requirements. It should also provide a framework for engaging with local residents and communities and their representatives throughout the construction period.
737. Specifically in relation to air quality the applicant has undertaken a demolition and construction dust risk assessment (DRA). It is acknowledged in that assessment that *“emissions and dust from the construction phase of a development can have a significant impact on local air quality”*. The dust risk assessment has been carried out using the IAQM’s ‘Guidance on the assessment of dust from demolition and construction’ to determine the potential impacts from demolition, earthworks, construction and trackout. The results of the assessment show that the development is classed as “High Risk” for dust soiling (dust deposition, resulting in the soiling of surfaces). It is recommended in the assessment that a Dust Management Plan is prepared to mitigate the potential impacts of construction dust on local air quality. This plan would be wide in scope including communications; site management and maintenance, monitoring, operation of vehicles and machinery and waste management. Given the identified high risk of dust spoiling the DRA recommends continuous dust monitoring station/s to monitor PM10 levels so as to ensure the effectiveness of the control measures.
738. Martin Cranfield Associates Ltd have reviewed the documents recommended that a detailed CEMP and Dust Management Plan (DMP) should be secured by planning condition. They advise that the DMP should also include asbestos dust/fibres and odorous dusts and effluvia from the site. With these measures in place the impact on air quality during the demolition and construction phase should be managed at an acceptable level.
739. 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

740. Key policies and NPPF paragraphs – DM3, DM11 NPPF paragraphs 170 and 181.
741. 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.
742. 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, 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 and Pitt Street. The assessment considers the potential 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.
743. 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} 36dB. With this level of noise attenuation, the WHO internal noise levels of 30dB at night and 35dB during the daytime would be achieved in those locations where road noise is at its highest. The ENA indicates that this level of noise reduction can be achieved with a typical double-glazing configuration of 10mm/6-16mm/10mm. The developer has indicated that they would apply this specification across the whole of the development. It is further recommended that trickle ventilators or mechanical ventilation will need to be acoustically treated. 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 cumulative effect of the development along with other committed developments in the area.
744. Martin Cranfield Associates Ltd have reviewed the ENA on behalf of the council and are satisfied with the broad conclusions of the assessment. However, they advise that the number and position of balconies on the St Crispins Road and Pitt Street frontages that will be subject to road noise in excess 55dB (WHO external noise level) has not yet been established. Blocks on these road frontages fall within the outline part of the application. At reserved matters stage the design of these facades should have regard to the impact of road noise, in terms of the number, placement and type of balcony. Noise abatement measures are likely to be necessary and verified through further noise assessment required at reserved matters stage.

745. Construction noise and vibration: These matters are addressed in the noise chapter of the ES and in the ENA for both demolition and construction operations. In terms of the demolition and 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.
746. The ES indicates that without mitigation the impact on demolition noise and vibration on existing shops and offices on the site and Magdalen Street is assessed as moderately adverse and on residents on Edward Street as major adverse. Adherence to the CEMP is recommended to mitigate impact with these measures in place the impact will be reduced to minor adverse and moderate adverse accordingly. The impact of construction noise and vibration on Edward Street residents with mitigation in place is assessed as minor adverse.
747. In the event of planning permission being granted a number of planning conditions are recommended in relation to noise control. These include requirement for noise assessment of external amenity spaces at reserved matters stage; requirements to agree a detailed CEMP, controls over piling and installation of appropriate noise attenuation measures. In terms of the operation of the development further conditions are recommended relating to controls over extraction and ventilation apparatus, installation of plant and the operation of the commercial service bay within Block M. With these controls in place noise associated with the construction and operation will be satisfactorily mitigated and will not have a significant environmental effect.
748. In terms of the operation of the site, there will be the need for the installation of plant associated with the residential blocks and individual commercial premises may require ventilation and extraction units. Planning conditions are recommended to ensure satisfactory design of these fixtures and nuisance is avoided. The use of the outside spaces for seating and events will be controlled through the S106 and the requirement for managements arrangements to be agreed for the public realm.

Energy and water

749. Key policies and NPPF paragraphs – JCS3, DM1, NPPF paragraphs 148-154.
750. 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 scheme's 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. In terms of water, JCS policy requires residential development to meet regulation 36 2(b) optional higher requirement of 110 litres/person/day water efficiency as set out in part G2 of the

2015 Building Regulations and for all other development to maximise water efficiency.

751. Paragraph 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.
752. Draft GNLP Policy 2 sets out energy and water management policies. The policy indicates that for energy new housing development will be required to provide a 19% reduction against part L of the 2013 Building Regulations (amended 2016) and all other development of more than 500sqm meet BREEAM 'very good' energy efficiency standards and energy policies. In relation to water efficiency, residential is required to meeting Building Regulations part G (amended 2016) water efficiency higher option standard and for non-housing development BREEAM 'very good'; water efficiency standard.
753. On 15 June 2022 new Building Regulations (BRs) for energy were introduced. These regulations are more demanding than, and effectively supersede, the submitted GNLP policy 2 requirements for both homes and non-domestic buildings in the GNLP. The new rules require a 30% reduction in carbon, which is significantly higher than the submitted policy 2 requirement, when compared to 2013 Part L standards. The new BRs are intended to be an interim standard on the way to the 75–80% reduction in carbon which government has signalled will be required nationally by the Future Homes Standard by 2025. Similarly, BR L2A now requires a reduction of carbon emissions in non-domestic new builds by 27%, exceeding the BREEAM "Very Good" policy 2 requirements.
754. This anticipated change to the BRs has been flagged throughout the GNLP plan-making process. Supporting text to submitted GNLP policy 2 on page 61 states *"The NPPF requires a positive approach to be taken to promoting energy efficiency. In doing so, policy 2 anticipates the Government's "Future Homes Standard" currently scheduled to be introduced by 2025, which will require all new build homes to have low carbon heating and high levels of energy efficiency. When the Government implements the Future Homes Standard it will strengthen (or replace) the GNLP policy approach by providing further measures"*. Necessary changes to policy 2 will be addressed through the Main modifications stage of the GNLP. However, Norwich's Planning Policy team leader has advised it is unlikely that it will be possible to set higher standards than the new BRs at this stage of plan making as the examination in public and previous consultations referred to the likelihood of the changes to the BRs superseding the emerging and then the submitted plan policies.
755. An Energy Assessment and Sustainable Report (EASR) has been submitted with the application. The energy strategy is set out in detail for the detailed part of the application, and it is indicated that the same energy approach will be adopted for the outline part of the site. The applicant has confirmed that all buildings will be built to new Building Regulations 2022, either meeting or exceeding those requirements.
756. The EASR outlines a 3-step strategy for the development - Be Lean, Be Clean and Be Green.

757. Be Lean - Fabric first approach: Energy demand of the development will be optimised and minimalised to exceed the requirements of the Building Regulations. In particular these measures will include specifying residential fabric elements (walls, floors, roof and glazing) which perform in excess of Building Regulations requirements setting air tightness at $3\text{m}^3/\text{h m}^2$ as compared to Part L (2021 as amended by 2022 and 2023 changes) minimum requirement of $8\text{m}^3/\text{h m}^2$.
758. Be Clean - Supply energy efficiently: Installation of energy efficient air source heat pumps are proposed to operate at high temperatures to provide domestic hot water. Electric panel heaters are proposed to meet residential space heating demand which is predicted to be low given the energy demand reduction measures. Space heating to the commercial areas will be by high efficiency air source heat pumps using Variable Refrigerant Volume Flow (VRV/VRF).
759. Be Green – Air source heat pumps are classified as pumps are classified as a renewable energy. The hot water and VRV/VRF heat pumps are expected a saving of 215.1 Tonnes of CO₂ resulting in 58.4% improvement over Part L (2021 as amended by 2022 and 2023 changes). In relation to JCS 3, 56% of the development's energy needs will be met through the use of air source heat pumps.
760. The EASR Addendum indicates that the provision of a site wide network has been considered but not proposed as a heat network would incur significant heat losses from transferring heat energy from communal heat generators to individual dwellings and commercial units. Whilst these may be reduced through optimising network design and pipework insulation the loss cannot be avoided entirely. The new build development has high levels of fabric insulation and therefore heat loss is low. The proportion of heat losses compared to delivered heat energy is therefore significant. They indicate local heat pumps achieve lower carbon emissions than a site wide network with central heat pumps as they have a similar seasonal efficiency to central heat pumps but do not incur the same losses. A site wide heat network is generally most appropriate when a suitable very low carbon heat source is available (such as waste to heat plant).
761. It should be noted that for multi-phase developments like Anglia Square, developers generally make building control applications on a phase by phase (or block by block basis). The buildings regulations requirements that apply are those in force at the time the phase of development applies for building regulations approval and commences. If tighter regulations are introduced, transitional arrangements apply. Given the anticipated construction period of 8 years it is anticipated that later phases of development will need to meet future higher carbon reduction requirements set to be introduced by the government through changes in building regulation.
762. In terms of water usage, the requirement of JCS 3 will be met. In relation to the issue of nutrient neutrality, the applicant has provided details of five variations of specification for bathrooms and kitchens proposed across the different tenures. Water calculations have been submitted demonstrating these could achieve a water usage of maximum of 105 litres/person/day, exceeding 36 2(b) optional higher requirement of 110 litres/person/day water efficiency as set out in part G2 of the 2015 Building Regulations. For commercial, the applicant will deliver shell and core and will meet BREEAM very good.

763. This higher efficiency measures are positively supported and assist in responding to advice offered by the Environment Agency regarding the need to safeguard scarce water resources in the east of England. In their latest response, the Environment Agency have highlighted the issue of groundwater abstraction and ecological damage to water bodies. As part of the GNLP process a Water Cycle Study (WCS) has been undertaken. This study has considered planned future growth and assessed water supply capacity, wastewater capacity and associated environmental capacity. In relation to water supply, the WCS states that the latest Anglian Water 'Water Resource Management Plan' indicates that through the introduction of strategic demand management options and supply side schemes adequate water supplies up to 2045 and will cater for the proposed levels of growth. Water use policies that achieve higher standards of water efficiency are important in managing future demand. Furthermore, in relation to this scheme Anglian Water has indicated that 65% of the water supplied in the Norwich Heigham zone, in which the development falls within, is fed by Heigham water treatment works which is not groundwater fed.
764. The proposed development exceeds JCS requirements in relation to both energy and water.

Archaeology

765. DM Key policies and NPPF paragraphs – DM9, NPPF paragraphs 184-202
766. 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.
767. 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.
768. Norfolk County Council Historic Environment Service (HES) have advised the imposition of a planning condition that is tailored to reflect the phased nature of the development and allow demolition of existing structures to existing ground level/floor slab level without the need for an approved archaeological Written Scheme of Investigation and associated discharge of condition application being in place. The starting point for agreeing the scope and nature of post-consent mitigation for each phase will be an overall deposit model, or heat map detailing the depth and nature of impacts from previous construction, which differ significantly across the site.
769. In relation to the warehouse building on Pitt Street, HES recommend the imposition of a condition requiring the agreement of a programme of historic building recording (bespoke, to be agreed by condition) and a written scheme of investigation for the controlled and supervised dismantling of the building.

770. Subject to the imposition of a planning condition and agreement of a comprehensive strategy the development would comply with DM9. Following an agreed programme of archaeological work, the development is judged to have a minor/negligible residual effect which is not significant in the terms of the EIA Regulations

Flood risk and surface water drainage

771. Key policies and NPPF paragraphs – JCS1, DM5, NPPF paragraphs 100 and 103.
772. A Flood Risk Assessment (FRA) 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.
773. The site is in a critical drainage area and surface water mapping information shows parts of the existing 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. Mapping data shows locations on Cherry Lane and on Botolph Street as areas prone to flooding. To the north there is a continuous flow path along Heath Street as far as Magpie Road in a medium risk event this flow path continue along Beckham Place to Edward Street, Cowgate, Magdalen Street and through Anglia Square.
774. The FRA considers the new development and flood risk in a range of rainfall events. In a 1:100 year (+45% CC) event the following locations are assessed as at negligible or low risk; blocks B, D, E, F, H, G , J,K and L. Locations/parts of blocks at greater risk include Edward St service yard, basement car park, blocks A, C, M and J3. The FRA proposes mitigation measures for these parts of the development. These are set out in the table below.

Location	Water depth in 1:100 year (+45%CC)(after mitigation measures)	Mitigation measures
Edward Street Service yard Basement car park	0	Raised hump at entrance Water proofing methods Drain/sump
Block A & M S/SE Block J	0.06– 0.11m 0.0	Evacuation Flood resilient construction
Block C	0.0	Raised floor level (0.3m) Evacuation

775. The proposed surface water drainage strategy is set out in an accompanying report. The strategy is based on sustainable principles and aims to provide significant betterment to the existing situation. Currently the site does not benefit from any attenuation features and as such surface water runoff flows freely into the adopted sewer network unrestricted and untreated. The proposed strategy relies on connection to the Anglia Water sewer system but has been designed to reduce flows as close to greenfield runoff rates as is practicable. It is proposed that this is achieved through a combination of measures including green roofs, bio retention swales and tree pits, areas of permeable paving and a network of geo-cellular attenuation storage devices. Rainwater harvesting is proposed to provide filtered water supply to bin washdown areas. These measures are designed to limit the volume of surface water entering the sewer system and improve water quality. A maximum surface water outfall rate of 242 l/s has been agreed with Anglian Water to manage all storms up to and including the 1:100yr + 45% Climate Change Event. This will be the equivalent of 49.5% of the existing 1:1yr surface water run-off rate, a significant reduction.
776. In the event of a flood event off-site flows would enter the site and pass through it. It is proposed that pedestrian walkways within the site will be graded to allow runoff to be directed away from new building frontages while also acting to route surface water through the site. It is proposed to fit alarms to the network of attenuation tanks serving the development. These along with information from meteorological warning systems would alert the site managers when action is required.
777. An offsite impact study has assessed how the development is likely to effect flood risk in areas surrounding the site. Most of the areas identified are already at risk of flooding however in some locations flood depths may increase (sections of the road in Magdalen St towards Cowgate and south of Whitefriars roundabout) and in other areas a reduction in flood depth is predicted (south of St Crispins and properties north of Block C).
778. Officers at the lead local flood authority (LLFA) have reviewed the flood risk assessment and the proposed drainage scheme. Following a detailed consultation response to the original submission, the applicant's consultants have undertaken further assessment, responded to technical questions raised and submitted more comprehensive drainage specifications. As a result, the LLFA have confirmed no objection to the application subject to the imposition of a number of planning conditions. For the detailed blocks these include, but not limited to: implementation of the surface water scheme in accordance approved scheme; submission of evidence that raised humps at the entrances of basement car park and service yard will be protected as flood defence structures; submission of details of flood resistance measures. In relation to off-site flood risk, they have recommended a condition which would secure an appropriate highway drainage scheme and further survey work to establish any need for the installation of flood resistance measures. In relation to the outline parts of the site, full detailed of a surface water drainage scheme will be required prior to commencement and prior to occupation of each block verification of surface water run off rates. Subject to these conditions the development is accordance with the requirements of development plan policies and NPPF in relation to flood risk management.

Contamination

779. Key policies and NPPF paragraphs – JCS 1, DM11, NPPF paragraphs 178-179-122.
780. A Phase I Desk Study/Preliminary Risk Assessment (PRA) has been submitted as a document supporting the application. An updated version of this assessment was subsequently submitted with the July set of amendments. The council's contamination consultant is satisfied that the PRA sufficiently characterises the site. The report identifies 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 contamination consultant 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.

Equalities and diversity issues

781. 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 10% 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

782. Key policies and NPPF paragraphs – JCS4, DM33, NPPF paragraphs 54-57.
783. The applicant has agreed to entering into a S106 Obligation with the council to secure the following:

Planning requirement	Details	Cost (where applicable)
Affordable housing provision	<ul style="list-style-type: none">• Provision of min of 10% affordable dwellings	

Planning requirement	Details	Cost (where applicable)
	<ul style="list-style-type: none"> 85% social rent, 15% intermediate tenure. Phased delivery of affordable units - with blocks B and C in phase 1, KL in phase 2 and the remaining in phase 4 	
Viability Review	<p>At the following stages:</p> <ul style="list-style-type: none"> reserved matters stage in the event of substantial delay in the development commencing in the event of the development not being built out at an agreed rate. fixed reviews at 30%, 60% and 90% occupancy of the development. <p>In the event of improved viability (profit level reaching /exceeding 16.5% of GDV) additional housing units to be secured on site unless the council agrees to financial contribution instead. In the case of final review additional affordable housing provision would be in the form of an affordable housing commuted sum.</p>	
Nutrient Neutrality	<ul style="list-style-type: none"> Prior to the commencement of each phase of development purchase mitigation credits sufficient to mitigate the nutrient budget requirement for that phase Not to commence until the council has confirmed available mitigation headroom and the payment for credits had been made. Cost of credits to be indexed linked to CPI 	<p>£ 3,790,393.7</p> <p>(estimated using base cost only)</p>
RAMS Recreation Avoidance	£185.93 per dwelling - indexed linked	£231,924

Planning requirement	Details	Cost (where applicable)
EGI (Enhanced Green Infrastructure)	Payment to fund EGI on Wensum and Gildencroft Parks	£61,140
Car club	<ul style="list-style-type: none"> Provision of car club spaces – min of 3 and subject to review up to 5. Active EV provision. Funding of car club incentives for new (first) households (£100 per household) Management and maintenance arrangements 	£110,000
Under the Flyover	<p>Phase 1 - Delivery of a public realm scheme for land under the flyover</p> <p>Either delivered directly by the developer or by the council with a commuted sum</p>	£288,688 (only payable in the event of the council delivering the scheme)
Public Toilet and Changing Places facility.	<p>Submission and agreement of Management Plan.</p> <p>Requirement for owners to construct, manage and maintain or procure the management and maintenance of the Public Toilets and Changing Places Facility in accordance with the agreed plan</p>	
Community Hub	<p>Submission and agreement of a management plan. To include</p> <ul style="list-style-type: none"> Provision of 'village' hall (approx. 146 sqm (NIA) floorspace) for hire by public and residents. Scheme for fit out to include: fixtures - accessible toilet facilities, kitchen area and suitable furniture to provide for flexible use. Community hub (approx. 550sqm (NIA) floorspace) for use by public and residents including: <ul style="list-style-type: none"> Toilet Social spaces – to include social gathering areas, bookable meeting rooms/hot desk areas cafe / kitchenette for refreshments 	

Planning requirement	Details	Cost (where applicable)
	<ul style="list-style-type: none"> ○Lift and stairs to mezzanine floor ○Managed parcel and foodshop deliveries (for onsite residents only) ○Reception area to manage bookings and residents deliveries • Management arrangement for all public facilities • 	
Anglia Square Management Plan	<p>Agreement and implementation of a strategy: measures to mitigate the impact of the development on existing businesses and tenants. To include:</p> <ul style="list-style-type: none"> • Payment of commuted sum to fund independent business advice and information regarding tenants and vacant floorspace. • Reasonable endeavours to allow continued occupation of current business premises (up until vacant possession is required on either health and Safety grounds or to allow demolition) • Reasonable endeavours to identify vacant floorspace (on site) and make available for displaced tenants. • To support continued access to site and business premises. • Provision of temporary signage • Proactive marketing including holding of events. • Updating and communication with tenants within the site and the local business community. 	£30,000
Employment and Skills Strategy	<p>To optimise the local labour supply chain and procurement:</p> <ul style="list-style-type: none"> • Reasonable endeavours to source site-based staff from the Norwich policy area • To liaise with local agencies for eligible staff positions • Covenant to offer training (NVQ or other work-related training) 	

Planning requirement	Details	Cost (where applicable)
	<ul style="list-style-type: none"> • Monitor and report. • Requirement to apply to subcontractors. <p>To optimise engagement with education - covenant to liaise with local agencies to arrange for secondary school pupils who are considering choice of GSCEs to visit the Development construction site.</p>	
Sustainable Communities Strategy	<p>Agreement and implementation of a strategy: measures for achieving an inclusive community and encourage social cohesion between the new and existing communities. Strategy to include (but not limited to) arrangements and measures for new residents, proactive marketing of Anglia Square as a shopping and community destination; measures to optimise community use of public spaces (including for events and cultural activities); measures to foster communication and engagement with the existing community (including residents, businesses, local organisations and charities).</p>	
Public access rights	<p>Agreement of a Public Realm Strategy and the requirement to manage and maintain the public realm for the lifetime of the development.</p> <p>Strategy to include: Delivery quality; maintenance and management body; delivery timeframe; construction period; use of the entire public realm (including access rights for the public at large on foot and bicycle and to foster use as a social and civic space); arrangements for carrying out works.</p>	
Healthcare Floorspace Reservation	<p>Blocks J3 (in phase 2) and F (in phase 4) Owner to notify Waveney ICS of commencement of phases 2 and 4</p> <p>Owners to undertake reasonable endeavours to liaise with ICS and enter into contract for lease of units within each phase for medical and health services.</p>	

Planning requirement	Details	Cost (where applicable)
	Owners to reserve the units for 6 months	
Total cost		£4,512,145.7

784. Planning obligations are required to meet statutory tests in regulation 122 (CIL Regulations 2010 as amended by the 2011 and 2019 Regulations). All the above matters are considered to pass these tests, being necessary to make the development acceptable in planning terms, directly related to the development and fairly and reasonable related in scale and kind to the development.

Local finance considerations

785. 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.

786. The scheme proposed represents an approximate £280m 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.

787. 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 £7.74m. 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.

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 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 'chargeable development and it is expected that an initial application will relate only to the detailed element of the application and be a claim for full relief from £2.38m 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 relevant to note that the City Council has entered a contract with Homes England and secured grant from their Housing Infrastructure Fund for £15m. As set out earlier in this report at paragraph 266, the Council is in technical breach of this contract at current time. In the event of planning permission being granted for a scheme which could benefit from this time limited funding, the council would immediately enter into discussions with Homes England to expedite an early review of the contract and seek amends to both milestones and deadlines, update the contract in light of the changes to the scheme and request an extension of time to the HIF funding Availability Period (to March 2025). Homes England remain supportive of the scheme and are positively engaged with officers but they have indicated that they will await the determination of the application before entering into detailed discussions about revisions to the contract. Should the funding be received it will be ring fenced specifically to fund the delivery of infrastructure designed to support delivery of the proposed development. How the Council can deploy

this funding is tightly controlled. Legal advice has been sought so all parties have absolute clarity on restrictions to ensure the funding is spent appropriately.

788. 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

789. 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. Under paragraph 11d of the NPPF, in the event of a deficit in the 5-year housing land supply the tilted balance applies, planning permission should be granted unless there are 'adverse impacts which would demonstrably outweigh its benefits'.
790. Following the expiration of the Northern City Centre Area Action Plan and prior to the GNLP process concluding, there is no adopted policy specifically addressing the redevelopment of Anglia Square. Notwithstanding this, development plan policy is strongly supportive of the principle of redevelopment of this brownfield site and regeneration of this area is a long held strategic objective of the Council as expressed through prior development plan policies, associated guidance, and emerging Greater Norwich Plan policy.
791. The site was first identified for comprehensive redevelopment in the City of Norwich Local Plan (adopted 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. More detail is given in the Anglia Square policy guidance note (PGN) although this dates back to 2017 and carries a lesser weight in the decision-making process as it is not part of the development plan.
792. The history of Anglia Square is pertinent. In the early 1980's Sovereign House was the workplace of 2400 people working for Her Majesty's Stationery Office (HMSO) and Gildengate House was full of office-based staff working for the Cabinet Office agencies. The positive impact of this level of employment should not be underestimated not only for the Norwich economy but importantly for footfall and vibrancy of Anglia Square as a busy office and shopping precinct. In contrast, looking at the situation today although economic activity exists at Anglia Square, it is limited and does not fulfil the potential of this key city-centre site. The current condition and vacancy of the buildings and site are 'synonymous with failure', creating challenges for both local businesses and the image of the wider city as a place for investment. Taken in a wider context, in the past decade sustained population growth in the city has not been matched by job growth. The Economic Development Manager in her comments to the application states: that to address deprivation and to foster sustainable growth, Norwich must support the growth of its business base and the increased economic participation and wellbeing of its residents. This will be achieved by increasing the number of jobs available and by delivering an appropriate modern housing offer and sufficient local amenities in vibrant city centre locations. Therefore, it must attract investment and businesses to redevelop redundant brownfield sites and buildings,

revitalising the city centre and presenting an attractive and successful city in which to live, work and study.

793. The steady deterioration in the appearance of the site and the condition of Sovereign House and the multi-storey car park in particular makes the case for re-development even stronger now than when the JCS was first adopted and since the determination of the last application nearly three years ago. The National Planning Policy Framework advocates maximising the efficiency in the use of land and increasing densities in central locations which are well located. However, the planning application history for Anglia Square, is one that has failed to unlock this site for regeneration despite the agreed consensus that redevelopment is needed and is a priority. The Secretary of State in his decision letter agreed with the findings of the planning inspector that the current condition of the site is a barrier to investment and that significant weight should be attached to the public benefits of securing regeneration of this strategic brownfield site. This history of failed planning applications adds to the considerations developers have when contemplating whether to bring forward schemes for brownfield sites within the city and which are already constrained by physical and environmental complexities. The site is large, highly constrained and supports an operational district shopping centre. Comprehensive redevelopment requires the demolition of one of the largest buildings in Norwich (riddled with asbestos), extensive archaeological investigation, and contamination remediation. The costs of developing this site are therefore exceptionally high. However, 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 and subsidies to be provided. A scheme that is not viable will be unlikely to be delivered at all.
794. The Economic Development Manager has stated that a continuance of failed planning applications will mean that 'Anglia Square will be cited as a high-profile failure which sends a negative message about the city to owners/developers of other sites and to prospective purchasers. Semi-derelict, empty buildings and undeveloped brownfield sites send a message of neglect, underinvestment and deprivation; they do not demonstrate a vibrant, successful city with a great lifestyle offer that will attract new businesses and talented workers'. In this context, a positive decision on a scheme, where it is shown that there is a very good prospect of delivery, is capable of reversing the process of decline and increase confidence in the northern city centre for wider development. The prospect of delivering a scheme which unlocks development leading to regeneration benefits within the northern city centre is capable of being attributed significant weight in the planning balance.
795. The proposal represents the largest development scheme proposed in the city centre for decades. The £280million investment will: enhance the physical appearance, the retail 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 city centre 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 mixed development and the proposal in terms of scale and ambition is capable of delivering the policy objective of comprehensive regeneration.

796. The proposed 1100 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 2.3 years of Norwich's annual housing delivery target at a time that the Greater Norwich authorities cannot demonstrate a five-year housing land supply against the JCS housing targets. Housing delivery is afforded substantial weight in the planning balance. Furthermore, although the amount of affordable housing is below policy compliant levels, the 10%, mostly social rented tenure, will make a very substantial contribution to addressing housing need in this part of the city. The proposed 10% level of affordable homes is an absolute development requirement, and the proposed S106 Obligation makes provision for this number to be increased in the future if viability of the scheme improves in time.
797. This quantum of housing delivery relies on building at both high densities and at heights taller than other residential development in the locality. The NPPF in terms of achieving well designed places, indicates that planning decisions should ensure that developments are sympathetic to local character and history while not preventing or discouraging appropriate change (such as increased densities). In relation to promoting effective use of land in meeting the needs for homes, the NPPF requires this to be achieved while safeguarding and improving the environment and ensuring safe and healthy living conditions.
798. Heritage impact, design and residential amenity were at the centre of the assessment of the previous call-in application. The Secretary of State (SofS) in his decision letter referred to a number of aspects of the scheme which he considered conflicted with the adopted development plan. These have been addressed in paragraphs of this report and it is material to hold in mind which policies the SofS found conflict with when assessing the extent to which the proposed development is judged to comply with the adopted plan. The SofS found the previous scheme was not in accordance with the development plan as follows - policies JCS1, DM1 and DM9 in relation to the preservation and enhancement of heritage assets; with JCS2 and DM3(a)(c) and (f) concerning design, DM12(b) in relation to heritage impacts, DM18 as it relates to DM1, and DM2 and DM13 in relation to residential amenity. The resubmitted scheme seeks to address these issues and officers consider that, in the main, it does this successfully.
799. In the following paragraphs the DM1 Sustainable development principles for Norwich, are used to assess and provide a concluding overview of the proposed development along with compliance with related DM policies.
- DM1 - 1st bullet point - enhance and extend accessible opportunities for employment, education, and training, stimulate competition and support business whilst enabling balanced, sustainable economic growth in the Norwich economy:**
800. The existing shopping centre is outdated, has limited capacity to serve a large district centre function and the office buildings are no longer fit for purpose and have no viable future. The replacement of the existing commercial floorspace with modern premises suitable for a mix of town centre uses and new housing, will enable the new centre to support the long-term viability and vitality of the wider Anglia Square/Magdalen Street large district centre. Although the development will result in a reduction of commercial floorspace on the site, the proposal which

focuses new units around a newly configured community/shopping square and along the frontages of primary routes, will enable the location to continue to act as a focal point with the range of units sizes and uses proposed and the delivery of a new food store in phase 1 meeting day to day shopping needs. Significantly the introduction of a new residential quarter to the large district will increase the demand for retail and other services boosting footfall and expenditure.

801. Following development, a net gain of around 104 FTE jobs is predicted. Taking into account indirect job generation this gain increases by around 70FTE jobs (average).

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 and employment. During the eight-year construction programme the development is predicted to create 204 direct construction jobs per annum and a further 207 indirect and induced jobs. In addition, the duration of the construction project will enable a number of fully completed apprenticeships to be delivered. This is particularly important as it will provide the opportunity for local residents to benefit from training and career opportunities.

The benefits to the broader Norwich economy have already been described in paragraph 205 of the report. The development is likely to act as a catalyst attracting further new investment into the city which could transform the myriad of stalled brownfield city sites.

802. In terms of DM 1 i), it is judged that the development will have a significant long term beneficial impact on the Anglia Square and Magdalen Street Large District Centre, the northern city centre and the wider Norwich economy. Accordingly, the development positively shows compliance with the following policies – JCS policies 5, 8,11,19, DM1, 16, 18 and 20. Significant weight should be attached to these economic benefits in the planning balance.

DM1, 2nd bullet point - 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:

803. The preceding assessment has considered in detail the extent to which the current proposals for the development of Anglia Square fulfil the legislation and policy that govern planning decisions in relation to matters of heritage impact and design quality. The key development plan policies are JCS2, DM1, DM3 and DM9. NPPF sections 12 and 16 are also material considerations. The Planning (Listed Buildings & Conservation Areas) Act 1990 requires local planning authorities to have special regard to the desirability of preserving listed buildings and to give special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.
804. This exercise necessarily acknowledges that the current condition of the site and the judgements made by the Secretary of State when he refused planning permission for the previous call-in scheme are material considerations.
805. There is a consensus that the Anglia Square site is in a poor condition and is capable of being dramatically improved by development. The current site condition is the baseline against which judgements of improvement or harm should be

made. Currently present on the site are bulky buildings of up to eight storeys that are empty or underused and visually and physically deteriorating (especially Sovereign House, the cinema, and the multi-storey car park). The historic street pattern was obliterated when Anglia Square was built and people moving through the site on foot encounter dark and convoluted passages, interrupted sightlines and a split-level circulation arrangement with staircases leading to little used car parking spaces at the upper level. The west part of the main site and the land to the north and west of Edward Street lack buildings and host visually intrusive surface car parking.

806. The site lies within the city centre conservation area and the setting of a range of listed buildings within it. The development will necessarily change the setting of those assets and the contribution the setting makes to the appreciation and significance of those assets, albeit to a much lesser extent than the call-in scheme.
807. Harm to the significance of two designated heritage assets due to a change to their setting has been identified (at the lower end of the spectrum of less than substantial) – St Augustine’s Church and 2-12 Gildencroft. This needs to be given great weight in the decision, especially in relation to St Augustine’s Church with its grade I status. The complete loss through demolition of the non-designated assets 43/45 Pitt Street and the warehouse to the rear of 47-51 Pitt Street will also arise. The Framework requires any harm to, or loss of, the significance of a designated heritage asset (including from development within its setting) to require clear and convincing justification.
808. Set against this harm are benefits to the historic environment, and wider regeneration benefits. The following listed buildings benefit through the replacement of poor-quality buildings or surface car parks that harm their setting currently with better-quality buildings and new active street frontages: 71 Botolph Street, Former Church of St Saviour, 31-35 Magdalen Street and Gurney Court, Former Church of St James, Colegate Group and the Anglia Square Group. It is acknowledged that the buildings proposed on the site are generally of a larger scale than those that characterise the conservation area generally. This is in part a response to viability considerations and a desire to optimise the quantity of accommodation in this highly sustainable location, but also reflects the more heterogeneous nature of the Anglia Square character area and its recent history as a place of bold architecture that elicits affection from many people who live and work in the area.
809. Several aspects of the development mean that even with this scale and density of buildings the development has been found to have a moderately beneficial effect on the heritage significance of the Norwich City Centre Conservation Area. In forming this conclusion, the management and enhancement policies in the City Centre Conservation Area Appraisal have been considered:
 - **Reinstate historic street patterns, especially an historic route between Magdalen Street and St Augustine’s Street** which is achieved to a large extent and is a considerable benefit to the conservation area through the proposed alignment of Botolph Street and St George’s Street, celebration of Stump Cross and the echo of Rose Yard.

- **Remove negative landmarks, such as Sovereign House and Gildengate House** which is achieved by demolishing both and also the multistorey car park
- **Preserve and enhance views of citywide and local landmarks and visually reconnect the northern City to the area south of the river through development at Anglia Square** will be partly achieved by celebrating the tower of St Augustine's Church in the restored alignment of Botolph Street. Views of citywide landmarks are preserved.
- **Appropriate scale of new buildings– In areas of low significance (such as Anglia Square) the prevailing scale of existing traditional buildings should be respected but the careful siting of taller buildings and use of larger scaled buildings in appropriate locations will be encouraged, provided they do not negatively impact on important views of citywide and local landmarks or affect the setting of listed buildings.** The proposals have been informed by a detailed study of the historic context of the area, which has enabled the taller and larger scaled buildings(?) to be appropriately located in a way that is consistent with the qualified encouragement for such buildings in this management policy. The scheme minimises the potential for jarring relationships with neighbouring streets and buildings through more modestly scaled buildings on the site edges. However, some harm to the significance of St Augustine's Church and 2-12 Gildencroft has been found though the effect on their setting, to the lower end of the scale.
- **Respect existing scale of buildings where Anglia Square meets existing development along Magdalen Street** is achieved through the development of a well-designed new four storey building on the Magdalen Street frontage on a recessed building line that replaces the visually poor building that currently occupies this part of the street.
- **Appropriateness of large-scale buildings near the ring road** is a permissive policy approach that was not supported by the Secretary of State in relation to the call-in scheme and therefore the current scheme features buildings that range between four and eight stories, with the tallest element set well-back from the road.
- **Retain the significant open space of Anglia Square** is a key part of the scheme and its new incarnation will be much more attractive space than the current space.

810. There are several other benefits to the city centre conservation areas that are not explicitly derived from management policies within the conservation area appraisal: planting trees and other vegetation across the site; developing surface car parks into positive built frontages, including the site to the north and west of Edward Street where blocks B and C are proposed; providing St George's Gardens as a residential open space to complement the more commercial Anglia Square public space and disconnecting Anglia Square from the flyover by demolishing the Upper Green Lane bridge.

811. The judgement made by the Secretary of State in relation to the call-in scheme are a material consideration in relation to the assessment of the current scheme, bearing in mind the reduced scale and impact of the current proposals. The Secretary of State found that while the benefits of the call-in scheme were sufficient to outweigh the less than substantial harm to the listed buildings when considered individually, they did not do so when considered collectively, given the range and number of heritage assets that were affected. He therefore found the proposals would conflict with policy DM9 DM1 and JCS1.
812. The applicant has sought to address these objections to the call-in scheme in both the commercial development brief and design of the proposed scheme. Of particular note is the absence of a twenty-storey tower, the general reduction of the amount and height of development and the breaking down of the previous 'monoliths' into smaller blocks. Compared to the call-in scheme the total amount of development proposed in GIA terms has been reduced by 35%. The height of blocks on Pitt Street and St Crispins have all been reduced to fit in terms of scale with surrounding development. Blocks on St Crispins of 4-8 storey (previously 7-10) are now comparable in scale to St Crispins House (extended up to 8 storey) and Cavell House (5 storeys). Given the reduced massing the 'zone of visual influence' has also reduced. It is therefore notable and disappointing that Historic England and (to an even greater extent) SAVE have failed to acknowledge the benchmark judgements of the Secretary of State and the planning inspector when asserting that heritage assets will be harmed in the current scheme to a greater extent than the secretary of state and planning inspector found the call-in scheme would have harmed them. Examples are Doughty's Hospital, buildings on Magdalen Street and the city centre conservation area as a whole.
813. When comparing the Council's assessment of the call-in scheme (in the planning committee report and proof of evidence at the inquiry) with the current scheme it is concluded that many listed buildings that would have had their significance harmed under the call-in scheme will now experience no harm, including several that were cited by the Secretary of State in his decision letter. The two listed buildings that will still experience harm under the current scheme are St Augustine's Church and 2-12 Gildencroft and this should be given great weight.
814. In the call-in scheme there was no break in the frontage and there were six height modulations overall rather than nine as proposed now. The height of the buildings directly on Pitt Street ranged from five to twelve storeys, with a twenty-storey tower strikingly prominent within the view from the churchyard and the setting of the buildings in the call-in scheme. Given the dramatic reduction in the scale and mass of building within the setting of these heritage assets it would follow that the assessment of impact and harm will be commensurately lower. In the case of both heritage assets the degree of harm in NPPF terms is now towards the lower end of the less than substantial category.
815. When considering the impact on visual receptors modelled in relation to the forty viewpoints, twenty are beneficially affected, nineteen experience no, negligible or neutral effects and only one is adversely affected.
816. In regard to heritage impact, the requirement in DM9 to "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" and to "maximise opportunities to

preserve, enhance, or better reveal the significance of designated heritage assets” is considered to be met.

Design

817. The scheme has been assessed against a design quality framework that organises local plan policies under the thematic structure of the National Design Guide and National Model Design Code. These connections between the design policy criteria are expressed in the table immediately after paragraph 514 in section 7 of this report.
818. **Context** (incorporating DM3b, DM3c, DM3e, DM3h, DM9) – Although the buildings are generally taller and have a larger footprint than historic buildings near the site, the scheme responds to the surrounding context by reducing the height of the buildings at the edges where they relate most closely to historic streets and heritage assets; keeping all buildings below the height of the tallest building currently on the site and constructing building facades from brick, which is the most common local building material. There are areas of relatively intact historic townscape adjacent to the site, but the overall context is heterogenous, and the “gritty” and “robust” character of the existing Anglia Square contributes to its sense of place and has influenced the bold approach to the design of some of the proposed buildings in gateway locations. The (re)introduction of a street network that integrates with historic streets and frames views of historic buildings and streets will make a considerable and positive contribution to integration of the scheme into the context. The assessment of impact on heritage assets concludes that most experience a beneficial or neutral impact, which demonstrates that integration with the surrounding context has been handled sufficiently well.
819. **Identity** (incorporating DM3a, DM3b, DM3c, DM3e, DM3f, DM3h, DM7, DM9) - Attributes that create an attractive and distinctive identity are the strong network of streets, alleys, yards and squares, with Anglia Square itself to feature a bold paving treatment and canopy design; the consistent use of a brick palette; and focal buildings with a distinctive architectural treatment (especially block D, block K1 and block L). More variety within the architecture is needed and reserved matters applications for the outline part of the scheme present an opportunity to achieve this, with particular attention needed to the balcony design and the way the thresholds to residential entrances meet the public realm.
820. **Built form** (incorporating DM3a, DM3c, DM3d, DM3e, DM3f, DM9, DM12) - The built form mostly offers a coherent pattern of development by positioning buildings as perimeter blocks framing streets and squares that connect well to the surroundings. The resurrection of Stump Cross on Magdalen Street with its new buildings and building lines framing the north and west edges of the space will be a notably beneficial aspect of the built form. Taller buildings within the site follow a predominantly north south axis. There are places where taller north south building elements meet each other across streets and alleys and this creates an uncomfortable height to width ratio that could feel oppressive in places, although could have benefit in accentuating the thresholds to entering large spaces such as St Georges Gardens. The least coherent part of the site will be the south-west because the new buildings will have an awkward relationship with the retained Surrey Chapel.

821. **Movement** (incorporating DM2, DM3d, DM3g, DM3i, DM28, DM31) - The accessible movement network is a particularly strong feature of the scheme design, which maximises the benefit derived from the density of development in a highly sustainable location and is a radical improvement on the current impermeable site condition. On the edge of the site there will be improvements to the capacity of bus stops on Magdalen Street; new crossings on New Botolph Street and Magdalen Street; a new route along the south edge of the development that benefits from the removal of the bridge connection to the flyover; widened footways on Pitt Street, Edward Street and Magdalen Street and improvements to the design of the northern approach to the St Crispins crossing that include the conversion of the slip road from St Crispin's Road into public realm. Within the development new primary street connections between Magdalen Street and St Augustine's Street (Botolph Street) and between the St Crispin's crossing and Edward Street (extension to St George's Street) will create convenient and attractive traffic free movement routes. The extension to St George's Street will provide a high quality (LTN1/20 compliant) section of the yellow pedalway where cyclists and pedestrians have their own space. Several secondary and tertiary routes will add to the traffic free movement options.
822. **Nature** (incorporating DM3d, DM3g, DM3h, DM3i, DM3j, DM5, DM6, DM7) - The features of the scheme that enhance and optimise nature and the extent to which safe, social and inclusive public spaces will be created are explained in the comments made by others on the scheme, which are generally positive, especially by comparison with the barren, convoluted and semi-derelict spaces that currently exist on the site.
823. **Uses** (incorporating DM2, DM3c, DM3d, DM3e, DM3g, DM3h, DM12) - A residential population will be introduced into Anglia Square for the first time with a positive effect on the mix of uses. It will likely increase footfall and vitality to the businesses within Anglia Square and the wider large district centre; community safety will improve due to the passive surveillance provided by people looking out from their homes and moving to and from them in the public spaces; and there will be more people to care about the place. Better quality replacement commercial space within buildings will be provided, lining Botolph Street and Anglia Square and animating those key public spaces. The infusion of activity and vibrancy should help Anglia Square return to its prime that was to some extent lost when the office populations in Sovereign House and Gildengate House disappeared. The community hub will provide valuable meeting space and a Changing Places toilet will offer a vital facility for people with disabilities and their carers. There to be scope for live / work accommodation to be introduced into yards that form part of the outline application.
824. **Homes and buildings** (incorporating DM2, DM3d, DM3g, DM3h, DM3i) - All homes will meet nationally described space standards and all new residents will have access to private and/ or communal amenity space. Where homes are not accessed directly from the street, they will be accessed via a communal core serving around nine homes. On-site communal facilities including; residents' gardens and the community hub along with entrances and bike stores, provide the opportunities for neighbours to meet and interact. Internal amenity conditions are considered in paragraph 836 of the conclusion but overall the new homes are judged to be satisfactory in terms of their function and design and capable of promoting a healthy and sustainable community.

825. **Resources** (incorporating DM3i, DM3j, DM4) - Developing intensively in a highly sustainable location is the main aspect of the scheme that will make an efficient use of resources by avoiding extra development on greenfield land that would generate much higher levels of vehicular movement. Policy requirements for energy saving in operational use will comfortably be exceeded by the deployment of air source heat pumps throughout the development. The technical guidance on avoiding overheating is met. The material employed in the construction process will have high embodied energy, but there are no adopted planning policies that would allow this to be resisted.
826. **Lifespan** (incorporating DM3i, DM3j, DM12) - The scheme's lifespan is connected to the risk of future obsolescence. The original Anglia Square development failed in part because of its complicated, inter-connected and high maintenance servicing infrastructure. A replacement scheme that reverted to more traditional plot-based individual buildings lined along streets would have maximised future adaptability and resilience. However, this would constrain the potential density of development on the site that provides the homes to serve residential need, boosts the economy of the large district centre and exploits the opportunities for sustainable movement patterns. The proposed scheme is more adaptable than the current development because it features thirteen freestanding buildings and two retained buildings, surrounded by attractive public realm exploiting natural desire lines, with servicing mainly on the street and no upper-level vehicular routes that depend on the continued existence of the flyover.
827. The scheme has been assessed against the design and historic environment legislation and policies that apply, particularly the Planning (Listed Buildings & Conservation Areas) Act 1990 and development plan policies JCS2, DM3 and DM9, in association with the latest government guidance on design in the National Design Guide and National Model Design Code. Sections 12 and 16 of the NPPF have also been treated as key material considerations. The importance of optimising the density of the scheme in a highly sustainable location to provide homes to meet demand and commercial space to support the function of the large district centre has to some degree compromised aspects of the design. However, the scheme is sufficiently well-designed, enhancing most heritage assets, including the city centre conservation area, by responding to its surroundings and development history, establishing visual connections to assets outside the site as extensions of new streets on similar alignments to their predecessors, providing attractive public spaces and featuring distinctive buildings that mark significant locations. Construction will transform a blighted and underperforming part of the city centre. Opportunities for further improvement exist through the submission of any reserved matters applications.

DM1 3rd bullet point - help to combat the effects of climate change and achieve national and local carbon reduction targets by making the most efficient practicable use of resources, minimising the overall need to travel, reducing dependency on the private car and high-emission vehicles and ensuring ease of access to facilities and services for all users both now and in the future:

828. 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 conveniently access the city centre for employment, higher order shopping, leisure and cultural activities. 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 removal of public parking, a significant amount of which is used as commuter parking will promote more sustainable travel to both the district centre and city centre. The level of residential parking is low in policy terms. A range of measures are proposed to promote sustainable travel, including residential and commercial travel plans, cycle parking, the provision of car club spaces and EVCPs.

829. The energy strategy for the development includes the provision of air source heat pumps to meet 56% of the required energy for the whole development, exceeding the minimum requirement set out in JCS 3. It is proposed to exceed the requirements of current/amended Building Regulations. Although the proposed scheme development relies on the demolition of substantial existing buildings and structures, the retention and re-use of these buildings would be impractical and militate against comprehensive redevelopment.
830. A comprehensive landscape scheme for this site which is currently devoid of green areas is included in the proposed scheme. The landscape is multi-layered including soft planting at ground, podium and roof level. A substantial level of tree planting is proposed within and on the edges of the scheme, beneficial to the streetscape, air quality and the environment. The landscape strategy, which also includes podium gardens and extensive green roof provision, will contribute to sustainable urban drainage management, biodiversity net gain and reducing urban heating. These environmental aspects of the development positively support this DM1 principle as well as other the following development policies JCS 1,2, 3, 6 and DM3 i) j), DM5, DM6, DM7 DM11, DM28 and DM31

DM1 - 4th bullet point - provide for a high level of safety and security, maximising opportunities for improved health and well-being and safeguarding the interests of the elderly and vulnerable groups:

831. The existing precinct is split level with poor access to the upper deck. The re-planning of the site provides the opportunity to create well used streets and public spaces which are accessible to all and, alongside natural and passive surveillance from new residential uses, 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% affordable homes, 10% of homes to be adaptable and accessible, public toilets and a Changing Places facility. These measures in combination are beneficial to health and wellbeing and inclusivity. These aspects of the scheme positively support this DM1 principle and the following development plan policies JCS2, 6, 7 and DM3 d) and g)

DM1 - 5th bullet point - help to promote mixed, diverse, inclusive and equitable communities, by increasing opportunities for social interaction, community cohesion, cultural participation and lifelong learning.

832. The development will result in the creation of a substantial new residential community. It is proposed that a minimum 10% of new homes will be affordable.

The local letting policy, the Sustainable Community Strategy, the Anglia Square Management Plan, and the Local Employment Strategy are important to the achievement of 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 levels of deprivation in this part of the city and significant weight can be attached to this outcome.

833. When judged against the sustainable objectives set out in DM1 the development performs well in regeneration terms. Furthermore, many of the objectives identified in the Anglia Square PPGN are also met by the development. These include; improving open spaces and public areas, reinvigorating the local economy; revitalising the retail and service provision; providing significant levels of housing; enhancing community facilities, improving public transport facilities pedestrian and cycle movements.
834. The assessment has identified a number of negative impacts resulting from the development or aspects of the scheme that would benefit from being improved. These include: daylight/sunlight conditions in certain location within blocks; impact of the development on existing residents living in close proximity to the site and the impact of the construction phase on existing tenants and users of the site.
835. Given the importance of living standards and the criticism directed towards the call-in scheme, this scheme, proposes a design and layout which achieves: a higher number of dual aspect units (around 50% rather than 25% as previously); smaller residential clusters and shorter access corridors with at least one window providing natural light (aspects the SofS identified as deficient). A greater effort has been made to provide flats with external amenity space either at street, podium, terrace level or through the provision of a balcony. These design measures have increased the variety of flats and added value to prevailing amenity levels. Notwithstanding, the number of single aspect dwelling remaining relatively high and the constrained light levels in parts of the development, the overall approach is considered acceptable given nature of scheme and densities which would be expected in a city centre scheme such as this. Although it would be beneficial for improvements to be made to a number of the proposed flats, the overall internal and external amenity conditions achieved are considered appropriate for city centre living and in accordance with DM2 and DM13.
836. In terms of impact on neighbouring properties this is one area where some conflict has been found with DM2 and DM13. Paragraph 666 sets out the constraints that some of these properties themselves pose in terms of light levels. Avoiding such impact would require very substantial changes to the height of development with a knock-on effect on viability. Furthermore, the negative impact on these properties needs to be weighed against the benefits of neighbouring unsightly land and buildings being developed and subject to public realm improvements.
837. In relation to the impact of the construction phase on existing tenants and the surrounding neighbourhood. Existing buildings on the site do not have a viable future. The vacant buildings blight this part of the city centre, and the condition of the shopping premises creates significant uncertainty for existing businesses. Both the scale and linked form of construction of the existing precinct present considerable challenges in terms of minimising disruption. Phasing will allow parts of the centre to remain open and operational for as long as possible and limit the

scale of demolition and construction taking place at any point in time. However, a consequence is that periods of large-scale demolition will feature over a 5-year period, and construction operations will be continuous for even longer. Furthermore, given the physical linkages of parts of the precinct, demolition in one sector of the site can impact on the function of another, meaning that disruption associated with one phase spills over to other parts. A number of planning conditions and S106 requirements are proposed to limit environmental nuisance and business disruption but a long build out project such as this will have a local impact and at times this may be challenging. However, in terms of the lifetime of the development and the wider benefits it will bring these impacts will be short-lived.

838. To weigh against these matters are the broad regeneration benefits of the scheme. The proposal represents a highly significant inward investment. With developer costs in the order of £280million, the council's Economic Development Manager has stated this level of investment will be a 'statement of confidence in the city of Norwich and boost the city's profile and attractiveness to inward investment'. The investment will:
- after two decades, unlock a large-scale brownfield site for regeneration
 - remove highly prominent unsightly vacant buildings, that currently blight the northern city centre;
 - enhance the physical appearance of the site through the construction of high quality buildings, streets and public realm that have regard to both the historic environment and the unique character of Anglia Square
 - boost the city's housing supply through the creation of a highly sustainable residential quarter which will have good connectivity to the existing surrounding community
 - provide much needed affordable homes, the majority of which will be delivered in the first two phases of the development (46 in phase 1 and 28 in phase 2)
 - through the introduction of new housing and improvements to the quality and viability of the retail offer at Anglia Square, support the long-term role and vitality of the Anglia Square and Magdalen Street Large District Centre
 - create much-needed local employment for Norwich residents including construction jobs with apprenticeship opportunities and skills training in the eight-year building development stage.
 - deliver outcomes capable of having a permanent, moderate to major beneficial impact on levels of deprivation in this part of the city.
 - supply a much-needed stimulus to rejuvenate other neglected or derelict sites within the city.
839. Due to the nature of the development proposal considerable evidence has been provided in relation to both development viability and alternative development options.

840. The applicant's previous and latest viability assessments have been thoroughly reviewed by Avison Young on behalf of the Council. They advise that at this stage there is no reliable viability evidence to substantiate the provision of higher levels of affordable housing than the 10% proposed and at this level, profit is well below industry targets. The applicant has indicated that the scheme is viable and deliverable and that in the event of planning permission being approved they will bring the scheme forward. Given reliance on HIF funding development would start later this year. There is no evidence that in the event of this development not proceeding that a viable alternative development would follow in short succession.
841. There can be no certainty about what would happen in the event that the proposed scheme does not proceed. The site has 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 and 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.
842. Approval of the previous scheme was finely balanced. The situation now is more heavily weighted towards an approval. The extensive regeneration of this site, as proposed, offers significant benefits to this part of the city centre, and would undoubtedly draw additional investment into the wider city. The scheme, which is considered to include a beneficial mix of uses for the site, delivers against a number of planning policy requirements and the social, economic, and environmental benefits which would arise are positive, multiple, and demonstrably outweigh the harm that arises from the development to the setting of 2 listed buildings (both at the lower end of less than significant), the loss of a locally listed building, and impacts on neighbouring amenity in terms of daylight levels. The scheme represents a noticeable improvement on the call-in scheme, which itself was recommended for approval by planning applications committee, and an independent Inspector upon first call-in. Furthermore, applying the tilted balance (based on NPPF paragraph 11d) the weight would be significantly in favour of approval.
843. For the above reasons the scheme is recommended for approval subject to conditions and a Section 106 agreement.

Recommendation

844. To **approve** application no. 22/00434/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 paragraph 784 and subject to the following conditions:

No	Conditions
1	Time limits
2	In accordance with plans, drawings and details

No	Conditions
3	Details to be approved (detailed blocks) – external materials, windows/ reveals, eaves and verges, louvres, doors, balconies, external flues etc, rainwater goods, street signs and lettering and shopfronts,
4	Details to be approved (detailed landscape) – hard and soft, play, ecology enhancements, public art, street furniture and management arrangements
5	Details to be approved - new canopy for Anglia Square
6	Detailed blocks - noise attenuation (for dwellings)
7	Details to be approved - Block B: boundary wall treatment /gateway leading to St Leonard play area
8	Blocks B - small mammal gaps
9	Outline elements – reserved matters to be approved layout, external appearance and landscaping
10	In accordance with parameter plans – additional details at RM, noise assessment (external spaces), BNG report, fire statement, Arboricultural Impact Statement formation of access from St Crispins Road
11	In accordance with phasing plan
12	Limits - maximum quantum of floorspace and dwellings
13	Reserved matters for blocks G, H and E to include a minimum amount of floorspace for commercial uses: Block G – min 420sqm GIA on the Anglia Square/Botolph Street frontage; Block H – min 360sqm GIA on Anglia Square frontage + min of 160sqm GIA on Botolph Street frontage; Block E – min 80 sqm GIA on Botolph Street frontage
14	Block M - provision of foodstore (min 559sqm) limitation on sale % non-convenience goods
15	Block D – provision of community hub floorspace (550sqm hub, 146sqm community hall)
16	Block A and KL - provision of 3 x large format units - limited to Class E(a)
17	Provision - minimum of 200 sqm. (Gross Internal Area (GIA)) of floorspace for purposes within Use Class E(b) food and drink and/or Sui Generis drinking establishments with expanded food provision
18	The commercial floorspace shall include a minimum of ten units, each with a ground floor area between 70 and 150sqm (NIA)
19	Construction and Environmental Management Plan – submission, approval, implementation
20	Demolition statement - submission, approval, implementation
21	Clearance of trees/hedges etc - outside of nesting season (standard condition)
22	Demolition and Construction Traffic Management Plan and Access Route
23	Archaeology - requirement for written scheme of investigation (WSI). Implementation in accordance with WSI
24	Warehouse to rear of 47-51 Pitt Street - historic building recording – bespoke, to be agreed
25	Warehouse to rear of 47-51 Pitt Street – requirement for WSI for the controlled and supervised dismantling
26	Three parish boundary markers on the side wall of 53-55 Pitt Street - to be stored and reinstated on the new buildings in as close to the same location as possible
27	Lifting, safe storing and re-using of the cobble setts on Botolph Street
28	Contamination - investigation, remediation, verification

No	Conditions
29	Unknown contamination – standard condition
30	No drainage system for the infiltration of surface water drainage into the ground is permitted other than with the express written consent
31	Piling operations requirement for Piling Method Statement shall be submitted to and approved
32	Surface water drainage / flood risk condition as required by LLFA
33	Flood warning and evacuation
34	Scheme for on-site foul water drainage works, including connection point and discharge rate,
35	Phases 3 and 4 – further noise impact assessment to establish noise attenuation requirements
36	Phase 4 – further air quality monitoring to establish need for mitigation measures
37	<p>Conditions required by local highway authority in relation to phasing of off – site highway works</p> <p>Including (but not limited to):</p> <p>Phase 1 – New Botolph Street and Edward Street crossings</p> <p>Phase 2 - Magdalen Street improvements including to bus stops and passenger waiting and new crossing</p> <p>Phase 3 - Cherry Lane and new St Crispins access</p> <p>Phase 4 - Pitt Street frontage</p> <p>Plus: street frontage improvements, protection of visibility splays</p>
38	Details (each phase) bike and bin stores
39	Details (each phase) Delivery and Servicing Management Plan
40	Electric vehicle charging provision
41	Limitation on use of residential parking - no use as commuter or contract parking
42	Demolition of Sovereign House prior to any part of Blocks E, EF, F
43	Details - crime prevention measures
44	Details - flues/extraction for any food/drink uses
45	No PD - Plant/machinery – details required
46	No PD – Communication apparatus /antennae
47	Compliance - 10% - M4(2) of the 2015 Building Regulations for accessible and adaptable dwellings.
48	Compliance - 110 litres/person/day water efficiency set out in part G2 of the 2015 Building Regulations for water usage.
49	Scheme – water efficiency for non-residential units
50	Compliance – National described space standards
51	Travel plan - residential
52	Travel plan - commercial
53	Scheme – Heritage interpretation

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.

Those required by local highway authority and utility operators.

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.