# Objection to Anglia Square proposals from Cllr Martin Schmierer (Green Party Councillor for Mancroft Ward)

As a councillor for the area who has represented the Anglia Square area for almost eight years and as someone who has lived in Norwich for 25 years, I feel I have a strong understanding of the north city centre area of Norwich. I wish to strongly object to this application, which displays a lack of concern for the local character and context and the needs and desires of local residents.

While some areas of the scheme outlined have improved noticeably since the 2018 proposals, I still feel that Norwich can and must do better than this. The key reasons for my objection relate to the lack of affordable housing, the egregious height scale and massing of the buildings, the lack of sensitivity for the historic nature of the wider area and the impact this will have on the cultural offering of our city. I will deal with these in turn.

### Affordable housing

The proposed figure of c.10% affordable housing is very low, compared to the local policy requirement of 33%. I share Shelter's concerns that "this is letting down local people who need affordable housing and breaches the council's own local policy, JCS4, which states that developments of over 16 units should offer 33% affordable housing."

As the Norwich Society stated, "It is very much to be welcomed that the majority of this provision is currently scheduled for the earlier phases of the development, though this does unfortunately require much of it to be located outside the main body of the development and in a relatively busy road-side environment. Less welcome is the intention to provide only 32 further units among the 733 homes that will follow. It is not easy to see how this small element would be successfully integrated into the later phases and in due course the Council may possibly be invited to take the benefit off-site as a cash contribution." Affordable housing contribution must not be in the form of a commuted sum. This is currently a relatively affordable area of the city, and the new dwellings should meet local need. On such a large site, there is no justification for not providing more affordable units on site.

The applicant's Financial Viability document outlines that they are have "secured £15 million (m) of Marginal Viability Funding from Homes England's Housing Infrastructure Fund (HIF) in 2020." It seems strange that with this level of government support, the scheme could still only provide 106 affordable units. This represents exceptionally poor value for money for taxpayers and local residents who are already struggling with the cost of living crisis, rising rents and issues of getting onto the property ladder.

If Weston Homes think they can take all this public money, for land which will remain privately owned; evade all their obligations to provide public infrastructure through CIL (equating to an enormous amount of money, on such a large development), and still only produce 106 affordable homes (effectively all paid for by the HIF grant), they need to be told in no uncertain terms to think again.

### Public amenity and public realm

When looking at the plans, it is striking how little greenery is proposed for the site. Most of the green space is in the form of roof gardens or ornamental hedges, which, while in themselves a welcome feature, do not meet policy requirements on enhancing appearance and character (since they will largely not be visible except from higher buildings) or on enhancing habitat links (policy

DM3 i), will not be accessible to the general public, and will not help to alleviate air pollution at ground level or break up the imposing mass of tall buildings.

I do not believe the proposals are in line with Policy DM8 of the Norwich Local Plan (Open space), which requires the provision of informal publicly accessible recreational open space on-site and provision for younger children's play space in developments with in excess of 100 child bed spaces. The north city centre area is already lacking in open spaces, with only two existing off-site play areas (Gildencroft and Leonards St) springing to mind nearby. These two play areas are across a busy road and do not compensate for the lack of playspace on site. By the council's own admission currently "the ecological value is currently relatively poor even for an urban area" and while these proposals may improve matters, they do not go nearly far enough for such a large development.

I am very concerned about the impact on listed residential premises, ecclesiastical buildings and commercial properties nearby. I fully concur with Historic England's assessment that the scheme "would cause a high level of harm to listed buildings in its immediate environs, including St. Augustine's Church (grade I), Gildencroft (grade II) and harm to other listed buildings including those on St Augustine's Street, Magdalen Street and to Doughty's Hospital (grade II)".

# Scale and mass of buildings

Norwich is not a high-rise city. It is distinctively low-rise and this should be protected. The entire proposal is of a mass and height which would completely dominate the area, and has no particular architectural merit which might help to justify such dominance.

Policy DM12 of the development plan 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". The proposed densities are far from in keeping with the character of the area and do not respect the nearby heritage assets. It is worth noting that most building in the vicinity are two or three stories tall. This is the lead that the developers should have been looking to rather than seemingly taking inspiration from the height, scale and massing of Sovereign House and other similar buildings, which as the Norwich Society note "were unfortunately dropped onto Norwich in the 1960s."

The proposed density, is typical of some of the more densely populated developments in London, and is way out of keeping with anything found anywhere in Norwich. High-density urban housing is what we need to be building, but this kind of 'superdensity' housing requires very careful consideration to be given to the impacts on infrastructure and amenity.

Massive, dense seven storey blocks, such as the ones proposed can be detrimental to quality of life if they are not exceptionally well planned and designed, well maintained, and accompanied by sufficient funding for infrastructure. I see nothing in the application to reassure me on these points. Infrastructure for tall buildings, such as lifts and sprinkler systems, is expensive; smaller scale buildings would be cheaper to build and would be more in keeping with the historic nature of Norwich.

# Design and character

Perhaps the most disappointing aspect of this highly controversial application is the total disregard it seems to display for the unique character of the area. There is little evidence that any meaningful consideration has been given to respecting the conservation area and the setting of the ancient listed cottages on St Augustine's Street, and no indication that the features of the local area, its layout and

architecture, have been taken into account. The plans show a collection of soulless identikit blocks that claim to be inspired by the courts on St Augustine's and Magdalen Street. However, these blocks could be taken from any other excessive housing development. If anything, they look like parts of London. They certainly don't look like Norwich.

Lowering the height of some of the buildings does not address the problem of a development that is fundamentally too massive and out of place in this part of the city. The overall effect is still of an imposing blocks. Some of Norwich's most historic and attractive streets will be overshadowed, overpowered and spoiled by this insensitive design.

The proposals simply cannot be said to comply with the council's policy DM3 of the development plan, which states that "Proposals should respect, enhance and respond to the character and local distinctiveness of the area. The design of all development must have regard to the character of the surrounding neighbourhood and the elements contributing to its overall sense of place, giving significant weight to the uses and activities around it, the historic context of the site, historic street patterns, plot boundaries, block sizes, height and materials."

The current proposals pay little or no regard to the character of the conservation area and – rundown mistake as the existing Anglia Square undoubtedly is – would actually have a negative effect on the sense of place through their sheer disregard for local context. I am therefore not surprised that heritage organisations like Historic England, SAVE Britain's Heritage and the Norwich Society are so forthright in the opposition.

Policy DM3 also states that "The density of development must take account of the need to protect and enhance heritage assets and their settings, where these would be affected." This is clearly not the case with this proposal, which does not properly consider the listed heritage assets on St Augustine's Street and Magdalen Street, and how significantly their setting would be harmed by this development. Such is the excessive scale of this development that it would also harm the setting of Norwich Cathedral, currently the focal point of the Norwich skyline when looked out from Kett's Heights or Mousehold Heath.

### Transport, traffic and air quality

It is difficult to see how air quality will not be adversely affected by the development, which includes the creation of 450 car parking spaces in a city-centre site of this size. Any new development should start from an aim to improve air quality - not worsen it. If Anglia Square is to be a place where people can safely and enjoyably linger and socialise, the air needs to be fit to breathe outdoors as well as indoors. Stricter laws on air pollution especially in urban areas are clearly coming sooner or later. The council will make life more difficult for itself if it approves applications like this which could well have a negative effect on air quality in already polluted areas.

The scale of the development will also have a major impact on traffic congestion, in an area of the city that is already extremely congested. The cumulative impact of all the proposed developments in this area needs to be given more careful consideration – planners need to ask themselves whether, given the constraints of infrastructure, air quality concerns and climate change, we can really afford to create new parking spaces for so many new homes in the city centre. Given that 25% of Norwich households do not own a car, and that this figure is likely to be higher in central areas, the proposed 75% residential parking provision is not low enough to reduce car ownership or make a positive difference to travel patterns.

I welcome the proposed high levels of provision of cycle parking. It will be important to separate

cycle and pedestrian routes through the site as far as possible to minimise conflict and make the routes safe and practical for both. I also would like to see the car parking spaces future proofed for when we embrace a less car dependent transport system as they do in places like the Netherlands for instance.

## Retail, leisure and commercial uses

I am pleased to see the the amount of retail and commercial space has been reduced from the previous application. This is important as it would have endangered the retail hierarchy of the city and keeping existing shops there will be a relieve to local residents fearing gentrification

However, I remain concerned that the thriving artistic community currently based in and around Gildengate House will be lost. In line with policy DM22, the applicant must show how these community facilities will be protected or suitable alternatives found. The provision of affordable studio space has enabled art graduates to stay in the city and develop their own businesses, while organisations such as Print to the People, Men's Shed and FarmShare provide valuable services to the local community. Any consideration of possible economic benefits from the redevelopment needs to also take into account the cost to the community of losing these assets. The site needs to be redeveloped, but the council must not allow this to result in another soulless development at the expense of the existing community.

#### Conclusion

While improvements have been made compared the previous schemes, notably in terms of the height of the buildings and the nature of the retail development, this sadly remains a deeply disappointing and unimaginative proposal which fails to take inspiration from the wealth of historic character surrounding the site. Anglia Square is a key site in the city, and it is so important to get its redevelopment right. Having represented the area for many years, I understand the desire to start work on redeveloping this large brownfield site in the city, but listening to residents the vast majority are rightly concerned about the current proposals and the impact this scheme would have on their lives.

The current proposals represent significant overdevelopment which would result in poor amenity for neighbours and future residents as well as harm to the conservation area and the setting of listed heritage assets. They would be completely out of place in Norwich and significantly damage the unique character of this part of the city. Additionally, the proposed level of affordable housing is much too low for a scheme that will be receiving millions of pounds of public money — especially if it is seeking exemption from CIL as well.

All this means that the question I have long asked about the various iterations of the designs remains unanswered; namely who is this development actually for? It does not meet the needs of local residents, who will be priced out or their neighbourhood spoiled, their independent shops and art studios lost, their roads clogged and their green spaces put under pressure from massively increased use with no accompanying investment. The developer has ticked the 'community involvement' box by giving various presentations, but has not adequately listened to the salient points of the feedback given.

Precedent elsewhere in the country suggests that the flats will be largely investment properties. They are sure to be financially beyond the reach of most Norwich residents. If these proposals go ahead, I fear this part of Norwich will be blighted by mistake that takes 50 years or more to rectify. The people of Norwich and especially the people who currently live, work and shop in the area