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by email



1 October 2018

Dear Graham Nelson,

**18/00330/F | Part Full/Outline application for the comprehensive redevelopment of Anglia Square and adjacent land on Edward Street. Anglia Square Including Land And Buildings To The North And West Norwich.**

SAVE Britain's Heritage writes to strongly object to the revised planning application for this scheme. We consider that this proposal would cause substantial harm to the City of Norwich and its designated and undesignated heritage assets. This would be as a result of the impact of the new buildings on the city as a whole and the setting of many surrounding heritage assets. The application is in clear contravention of national and local planning policy and we recommend that it be refused.

**Proposed scheme**

The revised planning application is for a mixed-use scheme which includes a tower, now reduced to 20-storeys, and blocks of 4-12 storeys on the site of the former Anglia Square shopping centre. It would replace a series of buildings, ranging from two storey Edwardian houses to larger post-war structures such as the multi-storey carpark or Gildengate House, both 7 storeys high. The site sits entirely within the Norwich City Centre Conservation Area.

**Substantial harm**

The harm caused by this scheme is twofold. Firstly, it fundamentally changes the skyline of Norwich. Until today Norwich remains one of Britain's best-preserved mediaeval cities, where the outstanding role of cathedral and church spires, castle and town hall is still legible. Largely unaffected by 19<sup>th</sup> and 20<sup>th</sup> century additions, this unique tableau would be irrevocably destroyed by the new tower. The tall building would be visible in the city views and challenge the prominence of the cathedral and therefore cause substantial harm. This is clearly demonstrated by the applicant's townscape assessment (Addendum August 2018) and particularly by viewpoints 8 and 9.

The document states that the magnitude of change in relation to the view from the Motram Monument for example (Viewpoint 8) is medium and that the residual effect is moderate-beneficial. We do not concur with this. In our view, the tall building in this view stands for a high magnitude of change, and the proposed tower would substantially harm the character of the City of Norwich as a whole and specifically the setting of the grade I listed cathedral.

Secondly, the proposal would cause substantial harm to some of the city's iconic streets and squares, including Castle Rampart, Elm Hill, Princess Street and Upper Street, lined by outstanding grade I, II\* and II listed buildings, and the surrounding Norwich City Centre Conservation Area. The magnitude of the scheme's detrimental impact is obvious from a range of viewpoints in the applicant's townscape assessment (Addendum August 2018, for example VP 12, 20, 22, 25, 32). The tower would seriously compromise the character of the historic streetscape and cause substantial harm of grade I listed St Augustine's Church and the Church of St George or the grade II\* listed Bacon's House.

The applicant's townscape assessment includes a number of viewpoints which demonstrate how the proposed tower affects the setting of the Norwich City Centre Conservation Area. The proposal sits uncomfortably in this low-rise context and substantially harms its setting as illustrated by viewpoints 15 to 19 and many others.

### **Planning policy**

The current National Planning Policy Framework (NPPF) provides the principles to assess this application on the extent of harm which would be caused to the designated assets (the grade I, grade II\* and grade II buildings and the conservation areas) surrounding the development site.

Para 194 states that: *"Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:*

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;*
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional."*

In our view, the proposal would substantially harm the setting of many grade I and II\* buildings such as the ones listed above. In our view, the proposed new flats do not provide a convincing justification for the harm to the setting of the designated heritage assets.

The local planning authority's Local Plan (2014) provides policies on heritage (Policy DM9 The historic environment and heritage assets) which states that: *"All development must have regard to the historic environment and take account of the contribution heritage assets make to the character of an area and its sense of place."* In our view, the proposal does not comply with local policies as it clearly does not have regard to the historic environment. It

substantially alters and damages the setting of one of the finest medieval cities in England, its cathedral and castle as well as many highly listed buildings.

As set out above, the historic city would be fundamentally altered by the introduction of this 21<sup>st</sup> century tower. We urge Norwich City Council planning committee to save Norwich from this short-sighted development which would ruin this beautiful city in the long term, and we recommend you refuse planning permission.

I trust these comments are useful to you. Please contact me at this office should you need further comment or clarification.

Yours sincerely,

A handwritten signature in cursive script that reads "Thomas Bender".

Thomas Bender  
Conservation Adviser