

Consultation response to Anglia Square planning submission

Summary

While welcoming the principal of demolishing the existing buildings on the site and re-developing Anglia Square, the Norwich Society believes that this application should be rejected for the following reasons:

- The application does not meet many of the policies or aspirations set out in the 2017 Planning Guidance Note and other key planning policies adopted by the local authorities after lengthy public consultations
- The proposed density is far too high and the resulting mass and scale of development and poor architectural design would damage the unique character of Norwich
- No relevant justification has been provided to support the level of harm that will be imposed on heritage assets local to the site nor the harm to sensitive and important views of heritage assets throughout the City
- The proposed 25 storey tower would spoil many valued views of the City and overpower neighbouring areas, as well as setting a precedent for more London-Docklands style developments unsuited to a city such as Norwich
- The proposed residential provision fails to meet the needs of local people
- The illustrations provided to show the impact of the development are misleading
- The justification for the proposed hotel and level of retail provision is unclear and the latter may impact on the viability of businesses in Magdalen Street and elsewhere in the City
- No proper provision for displaced artists and craftsmen has been guaranteed
- Some of the key proposals to meet sustainability targets are flawed
- The residential parking provision is too high for a well-serviced edge-of-city-centre site
- The phasing proposals mean that the most profitable elements will be built first, opening the potential for the whole development never to be completed and thus leaving a similar legacy to the existing incomplete Anglia Square
- No viability assessment has been provided, making it impossible to assess the developers' claims
- Overall, this proposal risks turning Norwich into yet another clone high-rise city, damaging its attractiveness for those who live and work here, for visitors, and for specialist and skilled staff considering moving to the City

Introduction

The Norwich Society shares the aspirations of the City Council and the developers for the successful regeneration of this important city site in a manner which preserves and enhances the special historic character of the area.

The developers' consultants have referenced the Conservation Area Appraisals and Historic England's research into the historic development of Norwich which set out the civic and built heritage we enjoy in our city today. Importantly, the consultants have also recognised the damage wrought on the area in the 1960's and 1970's by the inner ring road alignment with its flyover, with the excessive bulk of buildings erected for H M Stationery Office, and with the subsequent but never completed Anglia Square development.

The Norwich Society also welcomes the developers' consultants' awareness that the current buildings on Anglia Square are out of scale with the 2-3 storey buildings in the Conservation Areas surrounding the site. Many of these buildings are listed as heritage assets that have significant settings within a historic city that is recognised nationally as having the largest extant area of medieval streets enclosed by a defensive wall.

The Norwich Society acknowledges that the developers have produced a master plan design that is, at least in site layout terms, a distinct improvement on the 2009 and 2013 permissions. The improvements made to the site's permeability and the re-establishment of historic routes provided by St George's Street and Botolph Street are welcomed.

However, there are many aspects of the proposed scheme about which the Norwich Society has serious concerns and reservations:

1.0 Design Objectives and Urban Design

We support the four principal design objectives set out by the developers and consider that the scheme has made a contribution towards achieving them:

1. Re-establish the two primary historic routes through the site;
2. Retain and enhance Anglia Square as a public space and create the new St George's Square;
3. Provide new frontages along new routes and enhance existing edges;
4. Reinforce and enhance historic visual links.

Policies DM3 and DM9 in the Development Management Policies Plan and repeated in the 2017 Anglia Square Policy Guidance Note give 'significant weight to a number of key design principles including the need to protect and enhance significant long views of major landmarks identified in Appendix 8 of the local plan, including the St John's Roman Catholic Cathedral, Norwich Cathedral, and City Hall' and 'ensure that development has regard to the historic environment and takes account of the contribution heritage assets make to the character of an area and its sense of place.'

We do not believe that the proposals in the application meet these requirements.

The developers' premise for the mass and scale of development is that:

'The impact of new development within the wider context can be minimised by broadly following the datum established by the existing buildings which have been found not to impact on the setting of historic city landmarks or harm their overall high significance.'

This is a false premise. There are numerous examples, as the images below demonstrate, where the existing 1960's and 1970's buildings on the Anglia Square site have had a detrimental effect on the townscape. It is a missed opportunity that the design does not seek to mitigate these by reinstating more of the views that were harmed by building these previous developments. For example, the Planning Guidance Note points to the awkward protruding 'lift plant' on the roof of Sovereign House as 'undesirably dominating its surroundings'. Any new development should not use the existing buildings as a baseline but seize the opportunity to reduce the bulk and height of any new buildings on the site and begin to repair the damage inflicted upon this historic area of Norwich.



View of Gildengate House from Doughty's Hospital



Sovereign House at St Crispin roundabout

Likewise, we do not consider that the design achieves the aim, stated in the Heritage Guidance in the Design & Access Statement, that 'New proposals which seek to maintain a scale comparable to the existing building, while allowing some graduation down towards the edges of the site, will help to integrate the new buildings into the historically sensitive surroundings'.

Far from graduating down towards the edges, apart from towards Magdalen Street on the east, the scheme presents 10-12 storey high continuous blocks along the south and west edges that create a fortress wall to St Augustine's Street, the area of Gildengate, and historic streets to the south of the flyover. These all contain small-scale heritage buildings that should retain their wider historic settings and outlooks. For example, while the new proposal hopes to cash-in on the view from within the site to the tower of St Augustine's church, the reverse view is not favourable to the heritage asset, nor does the proposed scheme make any attempt to mitigate the harm that the development would create.

We also do not consider that the scheme complies with the ambition within the Aspiration and Vision', for 'a clear relationship in built form with the surrounding area'. As the Design and Access Statement confirms, the predominant development around the site is 2-3 storey buildings: these bear no relationship to the scale of the proposed buildings and which would have an un-neighbourly and overbearing appearance.

2.0 Scale and density

With 1,250 units on 4.51 hectares, the density will be 277 dwellings per hectare. Assuming two people per home, Anglia Square would have a density of around 550 people per hectare; this compares with an average for Norwich of 33 and 44 for the City centre Mancroft ward.

Under the London Plan, the recommended density for an urban area is 70-60 dwellings per hectare. Leeds – a city considerably larger than Norwich – has a housing policy that stipulates a maximum of 65 dwellings per hectare for the edge of the City centre, a quarter of what is proposed here.

The density for Anglia Square is therefore well in excess of the maximum for a well-served urban area in London and demonstrably totally out of line with an Anglia Square development intended to be a local centre in Norwich.

The damage that such out-of-scale development will cause is exacerbated by the uninspiring architectural quality of the proposed buildings.

3.0 Residential Provision

The Design Brief states that this proposal provides 'much needed housing for Norwich'. However, the accommodation includes only 9 family houses (3-bed), with all the remaining 1,241 being one or two-bed flats. We question if this number of non-family flats is required for Norwich in view of the numbers being built elsewhere in the City, including those being created from permitted development through conversion of offices. The developers themselves point out that the adjacent Beckham Place development is made up of 12 one or two-bed apartments and 17 three-bed town houses, indicating a completely different type of demand from that being suggested for Anglia Square.

We note that the Leeds housing policy referred to above proposes a mix for edge-of-the-city centre of 40% houses and 60% flats and believe that, without evidence to the contrary, this kind of ratio would better meet the needs of Norwich.

Further, this scheme would make only a limited contribution to the affordable housing provision, comprising just 10% of the total. Policy 4 of the Joint Core Strategy suggests that 33% of all housing on larger development sites be delivered in the form of affordable housing and requires all proposals for housing to contribute to the overall mix of housing required to provide balanced communities and meet the needs of the area. We do not believe that the Anglia Square proposals come anywhere near meeting these policy requirements.

3.1 The Tower

We consider that even suggesting building a 25-storey tower in Anglia square is insensitive because it is far too high for its context, both locally and in relation to the wider cityscape; according to the submitted Built Heritage documents, the tower will cause harm to many heritage assets. The visual impact of the tower on the historic City skyline is also a critical factor when judging the scheme. In distant views from, for example, the Mottram Monument, the top of the proposed tower will sit well above the horizon.

The developers have said, during the previous consultation, that there was 'some support for the tower'. However, we wonder how many of those who responded actually supported the tower, as the evidence of public comment that we have received points strongly in the opposite direction?

The Design and Access Statement acknowledges that landmark tall buildings are absent in the area and are not a feature of the Norwich skyline. The argument that the larger industrial buildings that previously occupied the Anglia Square area act as a precedent for the height of the proposed tower is a fiction, as these buildings were completely different in configuration and visual impact. The majority of factory buildings demolished in the 1960's were single storey shoe factories and engineering works with associated office buildings on the street frontage of two or three storeys. These buildings were often surrounded by open storage areas for materials and lorry parking. The Odeon Cinema was the biggest building in the area and replaced a calico works which was, again, single storey.

It is incorrect, as the submitted documents suggest, that the area was heavily bomb damaged during WW2; the only major bomb fell on the Heatrae Works and was so insignificant that it did not stop production. The area of Anglia Square was not, as claimed, affected by the Baedeker Raids and did not need to be redeveloped. The single cause of widespread demolition in the area was for building the flyover.

It is also argued that views of the new tower will be peripheral to the Cathedral spire and therefore not compete. This, of course, is also erroneous, as it will depend on the direction of view. When approaching from the north, for example (which is stated to be a 'gateway to the City'), the tower will be seen close to or even in front of the spire. Instead of opening up views of the Cathedral spire the proposed new development is either narrowing or removing the view.

We suggest that it is misleading to compare the height of the new tower with the overall height of the Cathedral spire. The tower in fact appears more massive than the Cathedral despite being slightly lower due to its sheer bulk and the fact that, unlike the Cathedral, it does not gracefully diminish in size as it rises. We believe that no new building in Norwich should be higher than the lower of the two rows of large decorative roundels on the Cathedral tower that are well below the base of the spire itself.

Section 3.37 of the Planning Statement states: 'The design approach to the tower as discussed within the Design & Access Statement, is that it has been based on key design components of the Anglican Cathedral. These include principles such as the general proportions, the changing nature of the footprint as the height increases, the breaks and groupings of fenestration and the special detail treatment evident in the Cathedral building.' We see little evidence of this in the designs submitted for the tower. The change in footprint is minimal and can in no way be compared with the elegant tapering spire of the Cathedral.

The provision of a 25 storey tower will neither make Anglia Square a destination nor is it ever likely to be considered of sufficient merit to be selected as a heritage asset.

The developers argue that the tower is critical to the viability of the whole project, not least because the apartments on the top floors will sell for around £1 million each because of the views that they will provide. We do not believe that providing millionaires with wonderful views of the City should be at the expense of spoiling the views of everyone else.

4.0 Daylight and Sunlight

A further adverse result which arises directly and inevitably from the scale and mass of this development is the effect

on the daylight and sunlight enjoyed by neighbouring areas to the north-west, north and north-east.

The consultants' own vertical sky component analysis concedes that 29% of the existing windows in these areas will experience noticeably reduced levels of daylight but dismisses this as only 'natural' in an urban development of this scale. Their sunlight analysis also demonstrates the substantially greater degree of overshadowing that will be experienced by properties and in the public realm around Pitt Street, St. Augustine's Street and Edward Street.

In section 7.1 of the Planning Statement, the developers state: 'Naturally with such a development of this scale, there are areas that do not meet the guidelines'. This is a dangerous argument: any acceptance that a large development can ignore the guidelines is the opposite of what should be the case as the damage caused is, of course, exacerbated for a large development.

The Norwich Society submits that these effects are avoidable and have arisen from the excessive scale of development being placed around the periphery of this site. In our view, the development fails to give sufficient respect to the amenities of its neighbours and to the public realm on the northern boundary of the site.

5.0 Methodology

5.1 Heat map

Heat Maps have been utilized by the architects to suggest the heights and mass of buildings on different parts of the site. As they are being used to justify the design layout and the heights of buildings, it is essential for these to be generated from factual data and not, as it would appear, an interpretation of value judgements or post-rationalisation to fit an already-predetermined maximum number of storeys and location of the 25-storey tower within an already-proposed master plan.

Heat Maps are normally based on properly collected factual and verifiable data to explore serious issues such as pedestrian flow around streets in a locality to help discover, for example, how to redirect people into using safer routes, to improve the evacuation of a large sports stadium in an emergency, or to identify crime patterns, etc.

By providing these Heat Maps within the planning application documents without any clear explanation of the data they are based on, we are unconvinced of their veracity and remain of the opinion that the scheme is an over-development of the site and totally out-of-scale with its surroundings.

The example shown below well illustrates how out-of-scale the proposed development would be:



Current view from St Augustine's Churchyard

What it would look like if the development goes ahead

5.2 Verified views

The EIA Appendix 13.1: *Townscape and Visual Impact Assessment* confirms that the methodology used for the Verified Views is the *Design Manual for Roads and Bridges Vol II Environmental Assessment (2007)*:

'This Advice Note provides guidance on the assessment of the impacts that road projects may have on the cultural heritage resource. The cultural heritage resource is sub-divided for the purposes of this guidance into three Sub-Topics: Archaeological Remains, Historic Buildings and Historic Landscape.'

We would query if this is a suitable methodology and explains why, for example, the view from Catton Park is

described as having a 'High Sensitivity', whereas the views across the City from the Mottram Monument and elsewhere - which include the Cathedral and other heritage buildings - are only consistently described as having 'Medium' or even 'Low Sensitivity'. With the Cathedral being recognized in the submitted documents as the most important heritage asset in Norwich, views that include any part of it can only be described as having a 'High Sensitivity' in every case.

Among the suggestions in the same documents it is said that Norwich Cathedral is not quite as important as Salisbury Cathedral because the latter has been the subject of paintings by John Constable – therefore some degree of harm can be applied to the wider setting of the Norwich Cathedral tower and spire from the construction of a 25-storey tower in Anglia Square. This suggests that judgements made in the documents regarding the impact on the setting of the Cathedral and of many other heritage assets have been written with a bias towards supporting every aspect of the new development.

We would also query whether in so many instances it is feasible to suggest that, because existing streets consist of poor quality buildings, this can be corrected by harming the existing views with the imposition of an alleged improvement in Anglia Square comprising a 'high quality design applied to a point block tower in mitigation of inter-visibility in long range views'. We see little evidence for the claim that the tower block is 'a high-quality design'.

While the visualisations are useful, they tend to minimise the apparent impact of the development for the following reasons:

- (a) The apparent use of low camera position compared with average adult eye-line;
- (b) The viewing position chosen sometimes hides high or mass elements;
- (c) The use of wide-angle camera lens has the effect of increasing the foreshortening in the perspective view and reduces the apparent size of distant or tall elements, such as the tower; an effect noticeable, for example, in the view of the development seen with the tower of St Augustine's church in the foreground;
- (d) Making use of static viewpoints (often just from near historic buildings or choosing the narrowest view of them) does not take account of the potential increased impact of the development from various other viewpoints – for example as seen from the wider setting of an historic building such as the rear garden or the window view from an historic interior, or the view to another historic building or visually connected group of buildings;
- (e) The use of line outlines of massive buildings or impressions of light reflective surfaces on sunny days with good light reducing the actual impact of the structure itself.

The impact of the new buildings is minimised in the verified views by being lightened in appearance by using, for example, windows that reflect sunlight even when they don't face the sun. Any visuals from the north should be based on natural light coming from the normal southward direction, from behind the development.

We contend that the scale of development is better illustrated by simply blocking out the developer's visuals in grey, as shown elsewhere in this submission. Such block drawings more clearly illustrate the mass and scale of the proposed new buildings and are more realistic of what people will actually see.

In other words, the building visuals work up to a point but many are misleading. In the following image, for example, it is particularly misleading for the tower to be positioned immediately behind the pub sign, as shown below. A photograph taken from just 4 or 5 steps to the right gives a completely different and more realistic perception of the impact of the tower when viewed from a slightly different point. There is therefore a strong argument that the visuals do not properly represent the major impact of these new proposals.





The following view demonstrates the increased impact of the scheme when viewed from the higher ground at the Aylsham Road/Drayton Road junction. The view is from the bus stop opposite Buxton Road – an important approach to the City – from where the development appears to blot out the existing long view of the Cathedral spire and introduce the obviously-alien tower.

The Society remains particularly concerned about the elevated views from the east and north, for example the view of the city wall along Magpie Road which, with a 16th century building behind, represents the only view in Norwich of what it would have been like to arrive at the city in the medieval period. This unique aspect of the City's heritage would be irretrievably harmed by the imposition of a 25 storey tower into this view and with the loss of a view of Norwich Cathedral spire, as it would have been first seen by pilgrims arriving from Walsingham.

The Verified Views documents also fails to provide a view of the harm that will be caused to the setting of Cow Tower and ignores any potential impact on nearby Bishops Bridge and views from Riverside Road.

The document also dismisses the harm to the Grade II* Registered Waterloo Park by suggesting 'The development will result in a very small change to the skyline within the extended setting of the heritage asset. The degree of change is considered to be virtually imperceptible in terms of impact on the assets heritage significance.' Yet a terrace was built as part of the Park Pavilion design so that visitors to the park could enjoy a wide view from within Waterloo Park of the north side of the roof, tower and spire of Norwich Cathedral; this having been because it was recognized by the park's designer, Captain Sandys-Winsch, as being a view comparable with and as the east view as seen from the Mottram Monument and elsewhere. This unique view of the Cathedral will not be hidden by the leaves of trees, as suggested in the documents.



Norwich Cathedral from Waterloo Park – the 25-storey tower will probably be directly in front of the spire

6.0 Precedent

Giving planning permission to a tower of this height and an overall development that is so dense and comprises so many dominant high-rise blocks would set a precedent for similar London-scale developments elsewhere in the City. It would change the unique character of Norwich for ever and begin to turn it into yet another clone of cities around the world where the same architects have designed similar developments.

The economic benefits of the City's unique character – combining as it does a wealth of historic buildings and mediaeval streets while incorporating such gems of modern design as The Forum – come both from making it an increasingly-popular destination for tourism and from playing an intrinsic role in the science and creative industries on which the future of the City lie. A year ago, the Norwich Society commissioned an independent report into the problems that local companies were facing recruiting skilled and specialist staff from elsewhere. One of the key findings was that more than a third of those who had moved here were attracted by the City's 'beauty and heritage'; 90% of those who considered moving here thought that Norwich was 'a good place' to live and bring up children.

As we have pointed out above, the Anglia Square developers themselves use the precedent of the existing development as part of their justification for their application, so cannot argue that precedent is not an issue.

7.0 Commercial Elements

7.1 Hotel

Given that a new hotel is also proposed for St Marys Works, we consider that a full demand and viability assessment from a hotel consulting specialist is necessary at outline stage to justify including this in the application. Presumably the hotel is another element that is crucial to the viability of the whole project and knowing whether or not it is actually likely to materialise is important even though it is not planned until a later phase.

For a detailed application, we would normally expect to see an updated demand study and information about the

proposed operator so that the style of operation and the way this would match the needs of the City could be evaluated.

As it stands, we do not understand if the demand for a 200-bed hotel comes from current unsatisfied demand in the City. It seems unlikely that much demand for such a facility would be generated from the new development itself.

7.2 Provision for artists and craftsmen

The 2017 Planning Guidance Note pointed out that 'the artistic community currently based in Gildengate House and the surrounding area has the potential to bring some benefits to the redevelopment in terms of complementing the cultural and leisure offer and suggests the provision of some flexible studio/workspace accommodation for artists or makers in order to complement the existing cluster within the wider northern city centre area. The PGN also suggests that 'The development also offers the potential to include some live/work units for this and other live/work requirements.'

Although such provision is referenced in the application, no guarantees are provided and no information is given about the level of rents and so on, which would be a particular issue for these uses. We believe that providing satisfactory accommodation for those businesses currently in Gildengate House should be an explicit requirement and that the provision of live/work units – which would provide a valuable enhancement to the burgeoning creative businesses in the area – should be specifically provided.

The creative industries are likely to be a key factor in the future economic vitality of the City and Anglia Square should be seen as an opportunity to provide for their growth as the area around it is already the main focus for such businesses and is home to the Norwich University of the Arts which is a prime source for the entrepreneurs who will develop the businesses of the future.

7.3 Retail

We have reservations about the need for retail provision on the scale proposed and are curious about the idea that Norwich is missing a high-end furniture shop when there are already several in the City. We have two fears: first, that not all the shops proposed would be occupied given that Castle Mall and other areas of the City have many empty units. Second, we are concerned that the new retail provision may undermine the existing shops along Magdalen Street and St Augustine's Street. It is conceivable that both could happen to the detriment of the area's role as a district centre.

We can see little in the proposed development that would make it a 'destination' in its own right. It would need the provision of something like a 'Tate East' gallery to attract local and outside visitors to a genuine 'destination'. Anglia Square is now, and will remain, no more than a district centre.

8.0 Landscaping

Whilst supporting the ecological benefits of the green roofs and provision of roof gardens we are concerned that there is a lack of green spaces for the public realm areas which will only have superficial 'greening'.

It would be beneficial to have a public realm area of vegetation for relaxation and possibly including a performance space (as provided, for example, by the bandstand in Chapelfield Gardens), possibly near the site of the old St Botolph's churchyard.

Concerning cycle routes on the public streets, we would like assurance that these rights of way remain public and do not become 'privatised'. There should be access at all times.

The strategy for providing access for emergency vehicles entering the site, and routes through the landscaped areas, needs to be clarified. The design includes the placing of security bollards around the perimeter, controlled by the site management team. The operation of these must allow for ambulances to attend residents and pedestrians for incidents unknown to the management team, and to prevent cycle or foot-based criminal activity or provide an escape route for moped- or scooter based theft.

It is unfortunate that no children's play space is being provided within the development; the proposals only allow for improving links to and encouraging the use of the existing nearby children's playgrounds on Gildengate and behind St Augustine's Street. The communal gardens at higher floor levels for residents to use could well be too small in

comparison to the numbers to be catered for and in many instances appear to be in shade and therefore not particularly inviting. Some of the communal gardens seem to have glass balustrading that would hardly be a deterrent to children intent on climbing.

It appears that there are no public toilets planned for the Square: we would suggest these are provided in sufficient numbers for disabled and family use. There should also be the provision of more than one Changing Places facility.

We are also concerned that there is no cover provided from the elements in bad weather, as is provided in the current Anglia Square. None of the shop fronts or building entrances is recessed or has a canopy to provide any form of shelter.

9.0 Sustainability

9.1 Energy

The National Planning Policy Framework, the Joint Core Strategy and the 2017 Planning Guidance Note all lay emphasis on the need to minimise reliance on non-renewable energy sources; the PGN also calls for consideration of the use of passivhaus insulation standards.

The developers are proposing slightly higher than minimum Building Regulations insulation standards. However, there is no reference to passivhaus in the application. It is worth noting that the City Council is the UK leader in building passivhaus social housing and homes for sale on the open market and that the Hastoe Housing Association has recently published a report demonstrating that residents in passivhaus homes 'benefit from much lower energy bills and a comfortable environment' and recommend the much greater use of the passivhaus standard for new developments.

The requirement to produce at least 10% of energy from renewable sources is met by the proposed use of air source heat pumps for the commercial and retail space, which the developers claim equates to 18% of the whole site being powered by renewable energy. But this begs the question as to why air source heat pumps have not been considered for at least some of the residential apartments.

However, the proposals do not meet the Planning Guidance Note demand that the development should demonstrate how the scheme has seized opportunities to make the most of any available local economies of scale.

The potential for district heating is dismissed on out-of-date and misleading information. It appears that the only form of Combined Heat and Power considered is one that 'allows all the electrical power and heat output to be used to satisfy the building loads'. This is then dismissed for Anglia Square on the basis that 'the heat load is weighted to the winter months when there is a space heating demand. A CHP engine would therefore be sized to meet the hot water load of the site, which stays relatively consistent throughout the year. The commercial units would not have a heat load / dump high enough, all year round, to enable a CHP to work effectively, and match the electrical load... Combined Heat and Power is therefore considered totally inappropriate for the Proposed Development.'

This belies the fact that there are a growing number of satisfactory district heating systems now operating in large residential and mixed-use developments throughout the UK. The huge residential and commercial development at King's Cross is the country's largest CHP district heating system and provides all of the heat required and some of the electricity. Like many modern systems, this also features absorption chillers that use waste heat to provide the energy needed to drive the cooling system for the offices (part of the Anglia Square developer's case for air source heat pumps acknowledges that cooling will be needed for some of the commercial buildings). Other examples include the St William Homes development of 955 apartments in London and the Westfield Avenue development in Edinburgh which has 193 affordable flats that use a CHP system and saves each household an average of £150 year relative to a conventional mains supply/ boiler system.

An article in a recent *Energy in Buildings & Industry* magazine points out that 'CHP remains a popular choice in multi-storey residential apartments... Influencing factors (for installing CHP) include financial savings and environmental benefits'.

The developers also claim that parts of large buildings heated by CHP systems tend to overheat. While this was true in a few cases some years ago it is no longer a problem for modern systems which are both better insulated and well-controlled.

9.2 Ecology

Whilst no flora or fauna of any note have been identified on the site, there is no mention of anything that may be found in the surrounding areas such as the historic St Augustine's churchyard, in the historic Gildencroft, in the historic Quaker Cemetery, or the gardens of the Norfolk and Norwich Association for the Blind.

At the very least, consideration should be given to providing swift boxes and nesting facilities for other species that are being driven out of urban areas by new developments that have none of the looks and crannies that have previously and incidentally provided sites for them.

On a more detailed note, the report points out that there is a mulberry tree in St Augustine's churchyard and others nearby that were a symbol of the Huguenots who settled in Norwich and directly connected with the historic Norwich silk weaving industry that was a feature of the local area - as evidenced by the survival of long attic workshops over adjoining properties. Mulberry trees prefer full sunlight but will tolerate light shade. However, there is no analysis of whether the new shadows from the development and especially that of the 250-foot-tall tower would cause harm to these mulberry trees.

9.3 Flood Risk

The submitted report describes the risk of flooding across large areas of the site and the potential for shop units, ground floor plants rooms, ground floor delivery bays, and the underground cinema to be flooded. It would appear that the paving levels and ground floor slab levels are still to be finalised, in which case they will need to be monitored to ensure levels and building heights are not increased further or used to direct flood water to previously unaffected areas.

9.4 Contamination and remediation

The developers report is based only on a desk study of a limited history of the site and, while assessing that the risk to human health from soil contamination is considered to be moderate at present, it recommends that a soil investigation and analysis is undertaken to assess the risk to human health, buildings/services and the environment and that a geotechnical investigation should also be undertaken. It is possible there may be contamination from copper and lead used by Heatrae in the manufacture of hot water cylinders and zinc from making water tanks. A river may run in a culvert through the site.

We await sight of the investigation and what assumptions about the need for remediation have been included in the viability assessment.

9.5 Air Quality

The developers point out that 'High levels of pollution are expected along the A147 flyover, affecting the living spaces located at the road level and suggest mitigation in terms of mechanical ventilation, although this will, of course, add to the energy consumption.

Interestingly, the consultants suggest that: 'to further reduce pollution levels, efforts should be made to promote the use of electric vehicles and to reduce use of private cars by residents of the Development and those visiting or working within the retail and commercial premises at the Site.' Neither the master plan and design proposals nor the transport report appear to go very far in meeting these objectives.

10.0 Transport

10.1 Parking

We do not understand why the parking provision is so high at three spaces for every four dwellings. As a city centre scheme with good public transport and close to amenities, we would suggest that this is reduced to 50%.

If tackling air pollution is a priority, then providing just three electric charging points for the 600 public parking spaces and only seven for the 365 the residential spaces is grossly inadequate, especially in view of the likely rapid switch in the next decade to electric vehicles and the eventual phasing out of diesel and petrol. The explanation at the public consultation session was that every bay in the residential parking area would have ducting to enable charging points to be installed later when residents request this, which begs the question of who then pays and why go for piecemeal installation which would be much more costly than installing more in the first place.

The developers also say that they aim to reduce car use by, for example, encouraging home delivery of groceries. But this is rather undermined by very little thought having been given as to where vehicles delivering these will park: most of the available parking spaces for deliveries are some way from the residential areas.

10.2 Pedestrian & cycle movement

In the Design and Access Statement the visualisations do not indicate defined pedestrian or cycle routes but rather a series of squares with no clear routes through them. The Transport Assessment refers to cycle routes but gives no detail of the nature of the routes. Suitable routes need to be defined and provided as part of the proposals. The cycling proposals appear to meet the guidance requirements, as do the proposals for pedestrian movements. It also appears to be the case that following removal of the pedestrian underpass that walking along Magdalen Street under the flyover will remain the quickest and most pleasant way of crossing the ring road between the Anglia Square site and the area of Colegate.

One area of concern is how pedestrian-friendly will be the crossings so essential to navigate the St Augustine's gyratory and access the nearest play areas and green spaces and therefore likely to be used by children and their parents, including those with pushchairs, especially as no children's play areas are being provided within the development.

Delivery of many of the transport objectives will rely on the travel plan, stated to have the 'primary aim of reducing reliance on the car by promoting, and thereby encouraging the use of alternative modes of travel including walking, cycling and public transport'. However, this is only currently provided as a framework and is presented almost as a wish list. If this is properly implemented, then it would be satisfactory, but the devil will be in the detail. There needs to be proper consultation on this once the details are available. Similarly, details of car club provision are described as to be 'discussed during the determination process'.

Referring to the illustrative masterplan layout, the residential and hotel car park entrance is very close to St Crispin's roundabout. We fear that this would add to traffic flow problems at what is already a very congested junction at busy periods.

Finally, there are also concerns about the impact on Magpie Road, Esdelle Street, Edward Street, Pitt Street and St Augustine's Street and Magdalen Street of increased vehicle numbers during construction and afterwards and the heavier axle weight of delivery lorries (full or empty) on the road substructures and the structural integrity of all the heritage assets, many of which have basements or cellars, which are not fully identified or considered within the Built Heritage Statement.

10.3 Public Transport

No analysis is given of the existing Public Transport network passing through the area and having bus stops at Stump Cross in Magdalen Street. The current bus services stopping there are already intensively used and it is unlikely the existing services could cope with any additional number of residents from Anglia Square at morning rush-hour and any additional shoppers who may be encouraged to come from outside the area. Many of the current bus services have a very limited evening timetable with services being reduced from 6 pm onwards and all finishing between 9 and 10 pm.

The report suggests there will be some benefit to public transport from providing a bus lay-by at Stump Cross. The report does not explain whether this is to replace the existing bus stops and lay-by or is an entirely new facility.

11.0 Fire and Safety

The guidance encourages the installation of sprinklers in all domestic and commercial development'. There appears to be no reference in the application documentation to the provision of sprinklers anywhere in the development although we were told at the consultation that these will be provided. This needs confirmation.

12.0 Viability

Viability is the argument used to justify many of the components of the proposed scheme: indeed, Weston Homes has claimed that anything less than the application as submitted would not be viable.

However, as no viability assessment has been provided by the developers, it is impossible to verify any of these claims. We assume that no decision on the application will be made until a full viability assessment has been received. We

urge that the public consultation be reopened at that point so that those interested in this application can comment on the assessment and note that, in March this year, the Government announced its intention to insist that viability assessments be made public.

Much lower density developments have been successfully developed or are under construction both within and around the City centre in recent years and within other historic cities similar to Norwich. For this reason, evidence of exceptional site costs need to be submitted by the developer to justify the statements throughout the application that the scale of the proposals are necessary to achieve viability when it does not appear to be the case almost anywhere else.

These should take account of the £12m grant promised by the government to the Council for use in relation to Anglia Square, although it is noted these funds are for spending on local infrastructure to unlock a site and not for use to subsidise the building of homes.

A particular issue concerns the potential costs of site decontamination and remediation. As no on-site tests have been carried out, any costs attributed to this are highly questionable.

In the Society's view, any claim that there is no viable alternative to what is being proposed in this application seems highly unlikely and suggests a lack of creativity and research on the part of the applicants.

13.0 Phasing

We recognise that, for such a large development, phasing is inevitable. However, this does raise the issue of what is included in the early phases and what is left to the final phase. For example, we note that the tower – which has been claimed by the developer as one of the keys to viability due to the high prices of the apartments – is in the first phase while much of the community benefits are left until later phases. We are concerned that, in the event of a changing economic climate or other financial issues, the future phases may be curtailed or abandoned. The final two phases of the existing Anglia Square development were never delivered. This failure is a major reason for the understandable and long-term pressure for the site to be redeveloped.

At worst, the result of the proposed phasing could be an unwanted tower standing in the middle of nowhere and providing a future headache for another developer.

Our concerns are heightened by the developers' claims that any diminution of the profitable elements of the scheme threaten its viability, implying that it is highly vulnerable to changes in the economic and financial climate.

14.0 Conclusion

In summary, while there are aspects of the proposals which are welcomed by the Society, we consider that the scheme would be an over-development of the site and cause permanent damage to the cityscape, destroying some of the uniqueness that makes Norwich such an attractive place to live, work and do business. The development would have particular impact on the heritage values of the City as a whole.

In our view, this development would damage the essential character of the City and set a precedent for a style of development that is more suited to London than Norwich. In particular, allowing the tower as proposed would set a precedent. The City Council needs a policy to protect important City view corridors from this and any future high buildings that are proposed.

The density and mass of development has been attributed to arguments of viability, yet no evidence has been presented to support this.

It is not a valid argument to say that anything is better than what is there now. The size and impact of this scheme as submitted will dominate the City. It is important that the community as a whole works together to ensure that Anglia Square is developed in a way that is appropriate in scale, enhances its context, and respects the character and heritage of the City of Norwich.

Experience from the current unfinished Anglia Square shows the dangers of phased developments. We are concerned that the first phase of the application includes sections that are likely to be the most profitable, putting in doubt the likelihood that the whole proposal will ever be completed.

It is important to bear in mind that planning policy at national and local levels requires new development to achieve high standards of design. For the reasons given above we consider that the scheme as proposed falls far short of that requirement.

For these reasons, we believe that planning permission should be refused.

APPENDIX

The block visualisations shown below (as well as those shown in our submission above) indicate the impact of the mass of the buildings.

The developers' visualisation of the block overlooking St Crispin's roundabout also indicates the overpowering size of much of the development.



