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GREATER NORWICH LOCAL PLAN (GNLP) EXAMINATION

HEARING FURTHER STATEMENT MATTER 9: RESIDENTIAL BASED ALLOCATIONS – NEW SITES WITHOUT PLANNING PERMISSION THAT ARE ALLOCATED FOR MORE THAN 500 DWELLINGS

ISSUE 1 – ANGLIA SQUARE (REF GNLP 0506) PREPARED ON BEHALF OF WESTON HOMES PLC AND COLUMBIA THREADNEEDLE INVESTMENTS

“5. Has the effect of a scheme for 800 homes on the historic environment, and the implications for infrastructure, been properly assessed and can appropriate mitigation be achieved ?”

Iceni's Built Heritage and Townscape team have been asked to respond to the heritage part of the above question on behalf of Weston Homes Plc.,(WH), and Columbia Threadneedle Investments, (CTI). We have a deep knowledge of the site from involvement in the project since 2017. The infrastructure part of Question 5 is addressed by Peter Luder under separate cover.

It is my understanding that the current 800 unit figure is predicated on an indicative analytical exercise, undertaken by NCC to inform the GNLP Partnership, by 'shaving off' height from the 'Call-in' scheme. Because this exercise removed height from the higher levels of the scheme, and was undertaken before any pre-application discussions commenced in respect of the new scheme which is to be submitted, it was based on a reduction of housing numbers only, with the wider mix and scale of other uses remaining unchanged. Accordingly, the hypothetical 800-unit scheme tested by NCC officers also includes the entire ground level commercial floorspace from the Call-in scheme; a 600 space decked public car park, and cinema and hotel space. The NCC hypothetical scheme also related to a smaller site since the south eastern 'corner' to Magdalen Street did not feature in the Call-in scheme. Additionally, the above exercise did not assume any revisions to the layout to reduce the scale of individual blocks as seen across the city centre.

This is, accordingly, a very simple process, with limited assumptions of what overall block layout, height, scale and massing of development may be acceptable, and might alter the way in which the development interacts with its surroundings. The residential unit numbers would also be impacted by the extent of non-residential uses included. I do not understand that it was informed by a detailed Heritage Impact Assessment, (HIA), but rather NCC officers' knowledge of the historic context of the site and the Secretary of State's (SoS)'s conclusions on the Call-in scheme.

This process however needs to be compared with the findings of our analysis, and detailed consideration of the Call-in decision. Our evaluation of the new scheme has been based on verified views, zone of visual influence assessments and a review of the significance of settings of heritage assets, the equivalents of which are not presented as evidence to support the NCC assessment. Our assessment shows that setting a 'ceiling' for development within the site (in our view of around the height of the water tower of Sovereign House), and stepping down to the site edges, creates a three-dimensional space within which a scheme of scale can be developed, which would have a considerably reduced, and indeed acceptable, impact on the historic environment, compared to the SoS's conclusions of the Call-in scheme. This approach would set the scheme's potential visual impact at a level similar to or less than the present position.

The Call-in decision, where it identified harm, often did so because of the tower; this was the case in terms of the Anglican Cathedral, a Grade I listed building and Scheduled Monument; and for St Andrew's Church, a Grade I listed building, as well as the Grade II listed Natwest Bank, both identified as experiencing harm arising from 'competition' with the tower from the Castle Ramparts. The removal

of the tower, and an overall reduction in scheme height, therefore clearly sets a lower maximum level of 'potential' harmful impact that sits considerably below that of the Call-in scheme.

The way in which the three-dimensional space between the ground level and the 'ceiling' is then used within the scheme is for the consideration of the applicant and their design team, in consultation with NCC and others, and it is our experience thus far that 800 units comprising mostly flats could be comfortably delivered well within this ceiling, within a balance of wider uses. This needs to be assessed against other national and local plan policies to make efficient use of this brownfield site, since it is also our experience that a scheme can be delivered within this physical ceiling that has the potential to deliver a considerably higher number of flats without creating increased heritage harm, and in fact being capable of delivering greater heritage benefits than the Call-in scheme, through a reconsideration of its disposition on the ground. For example, reductions in certain land uses, or in parking provision, might not only reduce the height of the development overall, but might also provide opportunities to increase dwelling numbers whilst enabling the disposition of the blocks to be altered, thus increasing scheme permeability and reflecting surrounding historic character in the scheme's grain and ground scale. The heritage benefits that might be delivered by the recreation of historic routes and spaces within the site, or the creation of views of heritage assets (for example), would uplift the scheme's public benefit delivery, and offset heritage harms, within the context of an overall reduction in these harms from the Call-in scheme. This allows sufficient flexibility to the applicants to find opportunities for heritage benefits, and to consider how the scale and massing of the development might be balanced and amended to respond to more localised impacts and to reflect local character and secure public benefits. This process will ensure appropriate mitigation of any harm identified in an overall balanced manner.

In our view, therefore, by comparison, the assessment that has been undertaken by the GNLP Partnership, which has led to the proposed 800-unit figure for the site allocation, is flawed in methodology, since it does not take account of the upwards impact on residential unit numbers resulting from proposed reductions in non-residential floorspace nor the reduced visual impact of the scheme derived from smaller blocks, reflecting the improved permeability of the layout, both of which must be integral to the review of the scheme. The NCC appraisal of the impact of the 800 unit scheme is not therefore based on a comprehensive consideration of an alternative scheme and its HIA. However, it is our view, supported by our own detailed analysis, that the numerical conclusion reached by the GNLP Partnership is not one that should be dismissed; the site is indeed, according to our analysis, capable of taking 800 units and more, with a range of potentially enhancing factors potentially also being incorporated into such a scheme.

Laurie Handcock
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