



**Examination of Greater Norwich Local Plan
Matter 9 Issue 1 Anglia Square (Ref GNLP0506)
Historic England, Hearing Statement
February 2022**

Introduction

- 1.1 This statement addresses the Inspector's questions for Matter 9, Issue 1 of the Local Plan.
- 1.2 This hearing statement should be read alongside Historic England's comments submitted at previous stages of the Local Plan.

Matter 9 Issue 1 Anglia Square (Ref GNLP0506)

Is the proposed site allocation soundly based? In particular:

1. **Is an assumed site capacity of 800 dwellings justified? How does this relate to the recent refusal of planning permission by the Secretary of state for a higher density mixed use scheme (Ref APP/G2625/V/19/3225505)?**

Is the assumed site capacity of 800 dwellings justified?

- 2.1 It is Historic England's view that the assumed site capacity of 800 dwellings is **not sufficiently justified** as it is **not based on robust supporting evidence**.
- 2.2 At Regulation 18 and 19 we questioned the site capacity. We appreciate that the capacity has been reduced from 1200 at Regulation 18 to 800 dwellings at Regulation 19.
- 2.3 However, that still translates to **approximately 167dph** (of residential development), without accounting for any other uses that are also listed in the policy (retail units as part of large district centre, offices and flexible workspace, hotel, leisure and hospitality uses and community facilities).
- 2.4 It is our view that this very high density would be out of character with the surrounding area and the grain of Norwich and would cause harm to the significance of heritage assets. It would necessitate large, tall structures which are out of scale with the surrounding cityscape.
- 2.5 Whilst we appreciate the emphasis in national policy on high density development in sustainable locations, we would also highlight paragraph 11b and footnote 7 of the NPPF (2021) which states that there may be circumstances where the application of policies in the framework that protect areas or assets of particular importance (including designated heritage assets) provides a strong reason for restricting the overall scale, type or distribution of development in the plan area.
- 2.6 Norwich is one of England's great historic cities, and its architectural and historic character, and the sense of place associated with that, make a profound and wholly beneficial contribution to the city's well-being. However, we consider that this character is under pressure from recent developments and also the scale of growth envisaged both at this site and elsewhere in the Plan. We contend that the circumstances identified in para 11b of the NPPF apply here; and that the overall scale of development should be informed by, and conserve and enhance, the historic environment.

- 2.7 Therefore, to inform and explore the capacity of this site (and others in the Plan) Historic England have, over several years, suggested the preparation of two separate pieces of evidence:
- 2.8 **i) Site Capacity Evidence Document** - outlining the site capacities and the assumptions that have been made in reaching these figures, particularly for the sites in the City. The evidence should set out the indicative site capacity, site area, density (as dwellings per hectare dph), assumed maximum height, surrounding heights of development, other on-site and off-site capacity considerations (e.g. heritage, natural environment etc.).
- 2.9 To our knowledge, no such evidence has been prepared to support this or other allocations in the Plan. The closest evidence is the [Site Assessment booklet for Norwich B1.2](#) and [Appendix A Tables of Allocated Sites B1.52](#) but these simply give site area and capacity and don't really explore density, height and contextual considerations.
- 2.10 **ii) Heritage Impact Assessment** To inform the capacity of the site (and the allocation policy) we also advocated the preparation of a **Heritage Impact Assessment (HIA)**, in line with the advice given in the Historic England Advice Note on Site Allocations [HEAN3](#).
- 2.11 Our Growth Options response in 2018 highlighted the importance of assessing potential sites using the 5 step HIA methodology in HEAN 3. We reiterated this advice in subsequent Local Plan consultations at Regulation 18 and 19.
- 2.12 At Regulation 19 we continued to recommend that an HIA should be undertaken prior to EiP to inform the allocation and policy wording. We advised that the HIA should look more broadly at the impact of potential development as expressed in the allocation (rather than simply the previous application) upon the significance of heritage assets and consider the capacity of the site including issues of height.
- 2.13 In June 2021 the Councils issued a series of Heritage Statements, including one for [Anglia Square](#).
- 2.14 However, the City Council's heritage statement provides factual information and lists heritage assets.
- 2.15 By its own admission the Council's heritage statement '*does not attempt to describe how these heritage assets derive their significance in relation to Anglia Square or analyse the impact on the significance of those heritage*

assets that would result from the development of Anglia Square (para 1.2 GNLP 0506 [Anglia Square – Heritage Statement](#)).

- 2.16 In essence, it is not an assessment. Without an HIA, **the allocation is not sufficiently justified** as the potential impact on the historic environment has not been sufficiently assessed.

Relationship of current allocation to previously refused mixed -use scheme APP/G2625/V/19/3225505

- 2.17 The mixed-use scheme refused by the Secretary of State was for 1250 dwellings, hotel, ground floor retail and commercial floorspace, cinema, multi-storey car parks, place of worship and associated highway works and public realm areas.
- 2.18 In our Statement of Case at Inquiry we considered that the proposals would 'be profoundly unsympathetic to the character of Norwich. Their effect would be severely to compromise the character of Norwich, to damage its cityscape and in consequence to impair people's appreciation of the historic buildings and spaces which make up the city. The proposed development would also fail to respond to or reinforce the characteristics which are now held to make historic cities especially conducive to social and economic vitality.'
- 2.19 The Secretary of State refused the scheme in 2020 having identified harm to heritage assets and finding the scheme contrary to the Development Plan.
- 2.20 Clearly the allocation is for a reduced scale of development than that previously proposed. However, the revised capacity has not been based on evidence, and the potential impact on the historic environment has not been sufficiently explored, as outlined above.

Alternative Scheme put forward by Historic England at Inquiry

- 2.21 In our Local Plan representations, HE has suggested that a figure closer to 600 dwellings might be more appropriate in terms of density and historic grain of the City. This was based on the evidence put forward by Historic England at the Planning Inquiry (and referenced in our Reg 19 representations) for an alternative 600 dwelling scheme, known as the [Ash Sakula scheme](#). This remains our view.

Relationship of current allocation to emerging scheme

- 2.22 We have been involved in pre-application discussions for a scheme for 1100 dwellings and other mixed uses with the Council and developer (see [SOCC between GNLP and Weston Homes](#) for further details). However, Historic England has again expressed our strong concerns about the scale of

development and consider that it is not in keeping with the character and grain of the City and would harm the historic environment.

Summary

- 2.23 In summary, we consider that the capacity of 800 dwellings is **not sufficiently justified** as it is **not based on robust supporting evidence**. There is no detailed evidence on site capacity or heritage impact assessment to support a capacity of 800 dwellings. It is also **not consistent with the NPPF** para 11b.

2. Would a scheme for around 800 dwellings be viable and deliverable?

- 2.24 Questions of viability are outside Historic England's core remit. However, we can make the following general observations on the matter.
- 2.25 Historic England has not seen detailed evidence to verify whether a scheme on this site for 800 dwellings would be viable.
- 2.26 The various Viability Appraisals / Studies for the Plan as a whole ([B26.1-5](#)) do not explore such issues to that level of detail for individual sites. By their own admission, these are high level studies which seek to assess general development viability of the Plan rather than site-specific issues.
- 2.27 The site is complicated and likely to be expensive to deliver in terms of brownfield site clearance and potential archaeology. A consideration of viability should anticipate the value of the land reflects the planning constraints of the site including the conservation and enhancement of the historic character of Norwich. The potential need for and availability of public subsidy should also be taken into account. We contend therefore that the viability issue needs further exploration and justification. We have not seen evidence of this for an 800-dwelling scheme.
- 2.28 Finally, we understand that previous and current schemes have been reliant on Homes England HIF grant to support viability. We understand there is a time limit on the availability of this funding.
- 2.29 To summarise, there seems to be an absence of clear evidence to confirm or otherwise the viability of the site for 800 dwellings.

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?

a) Has the effect of a scheme for 800 homes on the historic environment been properly assessed?

- 2.30 In Q1 we explained our view that the effect of an 800 home scheme on the historic environment has not been sufficiently assessed.
- 2.31 Over several years we advised that an HIA should be prepared for Local Plan sites including Anglia Square in line with our advice note [HEAN3](#).
- 2.32 In June 2021 the Councils issued some Heritage Statements, including one for [Anglia Square](#). However, the City Council's heritage statement provides factual information and lists heritage assets.
- 2.33 By its own admission the Council's heritage statement '*does not attempt to describe how these heritage assets derive their significance in relation to Anglia Square or analyse the impact on the significance of those heritage assets that would result from the development of Anglia Square*' (para 1.2 GNLP 0506 [Anglia Square – Heritage Statement](#)).
- 2.34 In essence, it is not an assessment. Without an HIA, **the allocation is not sufficiently justified as the potential impact on the historic environment has not been sufficiently assessed.**

b) Can appropriate mitigation be achieved?

- 2.35 One of the purposes of HIA is to identify what mitigation might be appropriate and to explore how that could be achieved.
- 2.36 In the absence of an HIA, we lack clear, specific recommendations regarding what mitigation might be appropriate.
- 2.37 Therefore, it is difficult to determine whether appropriate mitigation can be achieved.
- 2.38 What is evident is that the policy as currently drafted does not include clear specific mitigation measures to address historic environment impact. This will be considered further in question 6.

6. Are the detailed requirements set out in Policy GNLP0506 justified and effective? Are they supported by the evidence and deliverable?

Policy, Guidance and Advice in relation to scope of policy wording

- 2.39 It is important that policies include sufficient information regarding criteria for development. Paragraph 16d of the **NPPF** states that policies should provide ‘*a clear indication of how a decision maker should react to a development proposal*’.
- 2.40 **Planning Practice Guidance** Paragraph: 002 Reference ID: 61-002-20190315 Revision date: 15 03 2019 also makes it clear that, ‘*Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interested parties about the nature and scale of development.*’
- 2.42 **Historic England’s Advice Note on Site Allocations** [HEAN3](#) includes advice on site allocation policies at paragraphs 3.1 – 3.2. It states, ‘*The level of detail required in a site allocation policy will depend on aspects such as the nature of the development proposed and the size and complexity of the site. However, it ought to be detailed enough to provide information on what is expected, where it will happen on the site and when development will come forward including phasing. Mitigation and enhancement measures identified as part of the site selection process and evidence gathering are best set out within the policy to ensure that these are implemented.*’

Analysis of current policy requirements

- 2.43 Our response will focus the mix of uses (criterion 1) and historic environment criteria (criteria 6, 7 and 14) and the extent to which the wording meets the requirements and recommendations of the NPPF, NPPG and our advice note, and is justified and deliverable.
- 2.44 **Criterion 1** lists the ranges of uses for the site including residential development, student accommodation, retail units as part of a large district centre, offices and flexible workspace, hotel, leisure and hospitality uses and community facilities. Elsewhere the policy indicates that the site will deliver in the region of 800 homes.
- 2.45 Even from these broad indications, it is evident that the site is being expected to deliver a wide range of uses and large number of dwellings which will inevitably lead to very high density development, at a scale which, in our view, is likely to be out of character with the surrounding area and historic grain of the City.

- 2.46 As discussed in questions 1 and 5 above, it remains our view that the site capacity and uses is not supported and justified by sufficient evidence with respect to impacts on the historic environment.
- 2.47 **Criteria 6, 7 and 14 all relate to the historic environment** and provide a useful starting point for site-specific criteria for the site.
- 2.48 **Criterion 6** notes that design should be high quality and locally distinctive and that a landmark building should be sited to conserve and enhance the significance of heritage assets and their settings.
- 2.49 Whilst we maintain our concerns regarding landmark buildings of height at Anglia Square, we welcome the reference to the protection of heritage assets. We also welcome other new proposed modifications to policy 3 and paragraph 204 in relation to taller buildings (see [SO CG1](#) p31 – 35).
- 2.50 We welcome the mention of named heritage assets in **criterion 7** and the requirement to conserve and enhance these assets.
- 2.51 In our [SO CG2](#) The GNLP authorities stated they would not object to a proposed modification being put forward by the Inspector to add '*including those*' before '*at Magdalen Street*' in Criterion 7'. Historic England supports this modification as it ensures that other heritage assets not specifically mentioned by name are not excluded. The criterion would then read,

7. Conserve and enhance the significance of the City Centre Conservation Area and nearby listed buildings including those at Magdalen Street, Doughtys Hospital, Doughtys Cottages, St Augustine's Street (including grade I listed Church of St Augustine), Gildencroft including any contribution made to their significance by setting.

- 2.52 **Criterion 14** We welcome the requirement for heritage interpretation measures and see this as positive enhancement of the historic environment.
- 2.53 In our [SO CG2](#), the Council have suggested an additional modification to add an **additional criterion** relating to Archaeology to read:

The site is located within the Area of Main Archaeological Interest. An archaeological assessment will be required as part of a planning application.

- 2.54 Historic England welcome this proposed modification.

Capacity issue not properly addressed – implications for historic environment

- 2.55 One of the biggest factors undermining the effectiveness of the policy in protecting and enhancing the historic environment is the site capacity, including densities and building heights. For the reasons outlined above, we have concerns regarding the capacity of the site indicated in the Plan and consider it is likely to have a detrimental impact on the historic environment. Not only is the assumed residential density very high, but the site is also being expected to deliver a wider range of other uses. We consider that such a scale of development is unlikely to deliver sustainable development in line with the core planning principles of the NPPF (para 8c).
- 2.56 In line with paragraph 199 of the NPPF, great weight should be given to the conservation of a heritage asset; this applies in all cases. Setting is an important aspect of significance and harm to the significance of designated heritage assets should be avoided in the first instance. Indeed, paragraph 200 of the NPPF makes it clear that harm to the significance of a designated heritage asset may be caused by development within its setting, and that any harm should require clear and convincing justification.
- 2.57 It is our view that the proposed scale of the development is likely to cause harm to the historic environment and so is not consistent with the NPPF.
- 2.58 We consider that issues such as impact on significance of heritage assets, capacity, height, density etc should more properly be explored through HIA in advance of allocation to inform site capacity, mitigation measures and policy wording.

Potential mitigation and enhancements not included in policy

- 2.59 The policy should also more clearly indicate any heritage mitigation and enhancements needed. This should be informed and evidenced by an HIA. In the absence of this evidence, it is difficult to draft policy wording that effectively ensures the protection and enhancement of the historic environment or that is justified on robust, proportionate evidence.

Conclusion

- 2.60 Therefore, it is our view that the policy criteria, whilst making some helpful reference to the historic environment, should be more detailed, specific and, in particular, informed by an HIA which would provide specific recommendations for mitigation and enhancement opportunities that could then be incorporated into policy wording. This would make the policy more effective in protecting and enhancing the historic environment.

2.61 The fact that no HIA has been undertaken means that the policy criteria have **not been informed by appropriate evidence** and are **not sufficient, justified or effective**. It is also **not consistent with the NPPF** as we consider it is unlikely to deliver sustainable development that conserves and enhances the historic environment. Therefore, we continue to have significant concerns about this allocation – in particular the scale of the allocation and potential to cause harm to the historic environment.