Dear Ms Armitage

Anglia Square, Norwich, NR3 1DZ. Application No. 18/00330/F

The Council for British Archaeology (CBA) provides comment on the above case.

Summary
We note that the application comprises a very comprehensive list of documents, plans and elevations. We also note that several of these documents deal with heritage and heritage related issues including views and townscape analysis. Whilst this is very welcome, the CBA believes that the current application fails at a fundamental design level. The CBA is deeply concerned about the scale and massing of the proposed development and its impact on the surrounding area and the wider City. We note that many documents related to the application set out to justify the scale and massing but the CBA does not believe this has been successful.

Significance
The application site lies within the Norwich Conservation Area, an area of high archaeological potential and affects the setting of several local designated and non-designated heritage assets. The scale and massing of the proposed development will also impact on the wider City including the Norwich skyline which is dominated by the Listed Grade I Anglican Cathedral and other designated heritage assets.

Comments
The Planning Statement and Design and Access Statement suggest that the overall design meets a requirement to be sensitive to existing character and appearance of the area by incorporating “set back” elements of 9-11 storeys with a step down to 3-4 storeys as an example, adjacent Magdalen Street. 12 storeys are proposed in the “less sensitive parts of the site”. “The design approach to the tower has been based on the key design components of the Anglican Cathedral.

We think the “requirement” is a reference to Norwich City Council’s Anglia Square Policy Guidance Note (PGN) published in March 2017. This document notes that most buildings in the area are 3 to 4 storeys. It also notes that to the north and east, buildings are largely of a traditional character forming terraced streets of 2-3 storeys. It also acknowledges that the existing Sovereign House is 7 storeys and the existing Gildengate House is 6 storeys.
The PGN is clear, in its vision, that the “...development will have a clear relationship in built form with the surrounding area....” (Paragraph 5.4). It also states that “...new development should be sensitive to the scale of existing buildings in its vicinity and must respect the setting of heritage assets.” (Paragraph 7.90).

It is hard to see how the development, based as it is, on structures more than existing heights, can be sensitive to character with the scale and massing that is proposed. The CBA appreciates that the existing site context is challenging and in desperate need of uplift, and that there is much to gain from re-discovering the historic grain of the site. However, we consider that this current proposal is far from being able to bring the kinds of enhancements that we believe are being advocated by the PGN. We consider that the Norwich skyline is at risk from the tower and we believe that the character and appearance of the Norwich Conservation Area and the setting of designated and non-designated heritage assets is also at risk from the overall scale and massing of the development.

We feel that the following statement in the Design and Access Statement is telling, “...The heights and massing has been carefully developed to ensure it suitably respects those heritage assets, whilst delivering a quantum of development that is financially viable.” (Pg. 77).

**Recommendation**

The CBA believes that this proposal should be scaled down and should deliver a more thoughtful enhancement of the area that better connects neighbourhoods and delivers placemaking opportunity suited to the character of Norwich rather than a financially viable quantum of development that is perhaps better suited to the London Docklands. The CBA objects to this application.

I trust these comments are useful to you; please keep the CBA informed of any developments with this case.

Bob Sydes MCIfA
Listed Buildings Caseworker for England

The Council for British Archaeology (CBA) is the national amenity society concerned with protection of the archaeological interest in heritage assets. Local planning authorities have a duty to notify the CBA of applications for listed building consent involving partial or total demolition, under the procedures set out in ODPM Circular 09/2005 and in Welsh Office Circulars 61/96 & 1/98.