

CHESTER ARCHAEOLOGICAL SOCIETY

COMMENTS ON CHESTER URBAN ARCHAEOLOGICAL PLAN

- 1.0 Given the acknowledged international archaeological importance of Chester, the Society welcomes the production of this Plan. We have the following comments.
- 2.0 Throughout it is assumed that CWaC will continue to employ heritage professionals/ planning archaeologists who are masters of the intricacies of the city's historic environment and possess the detailed local knowledge to recognise the full potential of development sites and the significance of new discoveries. In the light of ongoing cost-cutting in CWaC (eg the recent 'Make or Buy' consultation), can we be assured that this will continue to be the case? The vast amount of information summarised in the Urban Archaeological Database (UAD) is no substitute for understanding. We commend the temporary staff who have compiled the UAD and associated documents (including the one in question here) for their extremely efficient and effective work, but the various errors in historical and archaeological facts and interpretation commented on here *passim* reinforce the need for CWaC to retain and make best use of the services of the very knowledgeable and experienced permanent archaeological staff that it is fortunate to employ.
- 3.0 The language still needs occasional polishing: eg there are sentences separated only by commas, odd words missing etc.
- 4.0 *Preface* – the Plan is hardly a 'key evidence base': it is very much a summary of the evidence contained in the UAD and associated documents. The core of the document is the Guidance Notes and the maps of the Character Zones.
- 5.0 *Para 1* – Again, it needs to be emphasized that the Plan is merely the 'tip of an iceberg' (the UAD) and that people need to dig deeper to really understand the significance of the heritage assets in an area.
- 6.0 *Para 8* – See our comments on the relevant sections of the Draft Local Plan (http://www.chesterarchaeolsoc.org.uk/CAS_PlanConsult13_CWaC_LocalPlan_PublicationDraft_PC_comments_V02_web.pdf section 6).
- 7.0 *Para 8* - Have the archaeological policies in the City Council Local Plan been saved, as have those relating to conservation? In the Consultation Draft of the Local Plan they had not been.
- 8.0 *Figure 1* - The Salmon Leap Flats are actually on the other side of the Old Dee Bridge, in Handbridge!
- 9.0 *Figure 2* - Under 'Evidence base' surely 'Historic Environment Record' should read 'Urban Archaeology Database'?
- 10.0 *Para 10* - Chester was *the* largest Roman fortress in Britain, not *one of* the largest. It was a Saxon *burh* that was founded in the 10th century ('town' is too vague a word to mean anything, although *burh* could be glossed as 'fortified town').

- 11.0 *Para 11* – There is a good assemblage of Mesolithic flint from the amphitheatre excavations which appears to have been overlooked.
- 12.0 *Para 13* - ‘the foundation levels along the north and eastern walls are part of the original fortress defences’. What does this mean? Does it refer to timber strapping under the original timber rampart, or the Roman masonry (of uncertain date but certainly not primary) that survives up to 15’ high (cornice level) within the City Wall?
- 13.0 *Para 13* - ‘Chester was one of the few [Roman military sites] to be rebuilt completely in stone’. Is this true? What about the Hadrian’s Wall forts? Is it not possible that the barracks at Chester had timber superstructures on stone footings?
- 14.0 *Para 13* - It was not just the defences that were modified, it was many of the internal buildings as well.
- 15.0 The fortress did not suffer periods of abandonment, it had fluctuations in the intensity of occupation.
- 16.0 *Para 14* - Are ‘the character of the Roman harbour below the Roodee, and the extent of the cemeteries that surrounded the community’ .. ‘ examples of important Roman features that continue to be better understood with each new project’. Surely they are examples of features about which we continue to know little?
- 17.0 *Para 14* - Are the excavations at Lache (1930s) ‘early 20th century’? – A strange chronological perspective!
- 18.0 *Para 15* - What evidence is there for any population, agricultural or otherwise, within the former Roman fortress walls in the 7th century?
- 19.0 *Para 16* - Surely the lines of the Saxon defences are hypothetical?
- 20.0 *Para 16* - There is reference to ‘intensive’ late Saxon settlement. This is overdoing it. The relevant sentence would read much better if that one word were dropped.
- 21.0 *Paras 19 and 20* – There is too much emphasis on the Civil War, and the text on the rest of the post-medieval period is very general and not Chester-specific. The paragraphs would benefit from being re-written to focus more on Chester, how/why it largely missed out on industrialisation, and what it became instead.
- 22.0 *Para 20* - Include a reference to Western Command HQ and the underlying bunkers as exemplifying the final stage of Chester’s military history.
- 23.0 *Para 21* – ‘Research projects’ are not sources of information in the same way that excavation reports are. Again ‘articles’ can be excavation reports. The wording needs to be tightened up here.
- 24.0 *Para 22* - We find, *a propos* of the *Chester and Approaches Characterisation Study*: ‘The characterisation of the built environment consists of 16 General Areas, with 113 Sub-areas, and considers the number and quality of the historic buildings present and whether the overall character of each area (derived largely from its heritage) is

considered in a positive light by the community'. In fact, the evaluation of the character of an area, so far as we can see, is one made by the compilers, not by the community (*Chester and Approaches Characterisation Study*, para 2.22). We do not dissent from their judgements, but to say it is a community judgment seems to be misleading.

- 25.0 *Para 25* - Surely it is the significance of the heritage assets within them that define the significance of the zones, not *vice versa* (unless in the case of Group Value)? Is this not the place to introduce scheduling, listing and the grades thereof, rather than in paragraph 84? It also needs to be stated that ideas on significance change (archaeology is an iterative process), so what is said in this document is not true for all of eternity. This is all the more important because it is easy to become fixated with the highly visible monuments (eg the Walls, Rows, Cathedral) that attract tourists, to the detriment of others.
- 26.0 *Table 1* - This might profitably be accompanied by a reference to the section in the English Heritage document *Conservation Principles, Policies and Guidance* (2008) on 'Understanding Heritage Values'. In a city with so many high-profile monuments, the community value of lesser monuments could perhaps be emphasised.
- 27.0 *Table 1* - What does 'Contain significant elements of well-preserved historic character' mean?
- 28.0 *Guidance Notes 2 and 3* - We do not consider that the difference between the ways that developers should deal with heritage assets in Primary and Secondary zones is sufficiently clear.
- 29.0 *Para 33* – The sense might be clearer if the substance of this paragraph were amalgamated with paragraphs 34 and 35.
- 30.0 *Para 58* - Surely it is 'foundations and infrastructure works' that may be the most intrusive and may occasionally need to be excavated archaeologically? We suggest that the role of watching briefs (WBs) is for sites/stages of a development when archaeological remains are likely to be slight, infrequent or wholly unpredictable. We understand that IfA Guidance states that WBs are to observe and detect archaeological deposits, the presence and nature of which could not be established (or established with sufficient accuracy) in advance of development, so if there is thought to be some archaeological potential to a site but there is not enough evidence to justify an evaluation excavation or to attach a condition to the planning permission for excavation then a WB will be advised.
- 31.0 *Para 62* - Surely post-excavation work *normally* extends well beyond the on-site work?
- 32.0 *Para 72* - 'Due to the nature of the urban deposits in Chester, finds assemblages can be significant and provision for their consideration should be made in project designs and WSIs as well as in post-excavation assessment and analysis, as appropriate'. The meaning of this sentence is obscure. What should be stressed is the potential significance of deposits and the assemblages of artefacts, environmental material and craft/industrial waste they may contain and that these may survive independently of

structural remains. Post-excavation costs and timetabling need to take account of dealing with the potentially large assemblages of material that are likely to be found in urban environments. There is sometimes a misunderstanding that archaeology is about structural remains and their excavation so post-excavation costs and timetables need to be emphasised as much as on site provisions.

- 33.0 *Para 73* - Does this not duplicate paragraph 61?
- 34.0 *Para 77* - Is it worth mentioning the requirement for 6 weeks' notice for groundworks within the AAI in Guidance Note 1, where the emphasis is on planning ahead?
- 35.0 *Para 84* - the grades of Listing should have been explained before, eg under paragraph 25.
- 36.0 *Para 86* - Research *investigations* are not necessarily intrusive. The paragraph really refers to research *excavations*.
- 37.0 *Para 92* – Surely the classic Chester example of modification of design to allow excavation and display *in situ* is the amphitheatre? (where a planned road was moved).
- 38.0 *Para 93* – For above-ground archaeological features, one could cite the foundations of the Roman fortress wall that survive in front of the eastern side of the City Walls and the South-east Angle Tower.
- 39.0 *Para 93* - Are there any earthworks within the area in question?
- 40.0 For rock-cut features, one could cite Rock Lane between Parkgate Road and Liverpool Road.
- 41.0 *Para 100* - Did not Donald Insall do a Conservation Management Plan for the amphitheatre?
- 42.0 *Paras 108-9* - Is the implication that CWaC, by adopting the Archaeological Plan, will formally adopt the advice referred to in this section?
- 43.0 *Paras 108-9 and general observation* - A major deficiency of the report is that it fails to tackle what many see as the most important archeological issue in Chester, namely the future of amphitheatre, which has huge public interest. There is very little reference to it in the report but it was and is one of the most controversial sites in the City. It was the subject of a 3-year research excavation and post-excavation analysis is on-going.. In this context we find the section on disposal of heritage assets by the LPA very ominous given their current ownership of Dee House and its grounds. An archaeological plan without clearly dealing with the hugely important issue in a major section would be negligent.

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