

**CHESTER ARCHAEOLOGICAL SOCIETY**

**COMMENTS ON PROPOSED GORSE STACKS BUS INTERCHANGE  
(APPLICATION [14/04539/FUL](#))**

**Summary**

*This part of Chester includes below-ground archaeology that is now judged to be of national significance. The remains should therefore be preserved in situ as far as possible and appropriate mitigation agreed where preservation is not possible. We consider that the proposed design is a considerable improvement on other recent developments in this part of the city but suggest that it could be enlivened by artwork making reference to the history of the area. Our concerns and suggestions regarding the operational aspects of the bus exchange remain as expressed in our response to the recent consultation.*

**Detailed comments**

**1.0 Buried Archaeology**

1.1 *Character and Importance of the Site*

1.1.1 This site falls within [Character Zone 33](#), one of the ‘Primary Zones’ of the [Chester Archaeological Plan](#) (page 15, fig 7). Under ‘Key Considerations’ for the zone it states (*our italics*):

- This zone has preserved archaeological remains that may influence *national perspectives* with the potential for further discoveries of significant archaeological remains, with particular regard to the *inhumations* recorded at the George Street Centre.
- This zone is a key area within the Area of Archaeological Importance and planning and development here should be approached with particular sensitivity to the *potential for archaeological remains of at least a national level*.
- Key areas for medieval archaeology would be the Gorse Stacks common, where small-scale activity may have occurred throughout the period.
- There is also a strong likelihood for industrial activity around the Gorse Stacks as the area gradually became developed with yards, housing and market space.
- Recent discoveries of Roman to medieval features along George Street indicate a good level of preservation in an area of previously unknown activity – with the potential to influence our understanding of the immediate hinterland surrounding the city in the Roman to medieval periods.
- Strong potential for [*sc ?Saxon*] *human remains* at the George Street Centre area.

1.1.2 The *Historic Background and Assessment of the Site’s Archaeological Potential*, prepared by Earthworks Archaeological Services to accompany the present application, adds more detail. It records that significant archaeology has been encountered at depths ranging from only 0.3 m at the west end of the site to 1.1 m at the east end; at the east end archaeological deposits extended to a depth of 3.4 m below present ground level and apparently filled a natural depression. A *Roman*

*drain*, perhaps running from the north-east corner of the fortress (King Charles Tower) has been found at the west end of the site, and a *Roman road and buildings*, possible Roman clay extraction pits, a further late- or sub-Roman *burial* and late medieval tile- and brick-making waste a little further to the west. The natural depression at the east end of the site, which would lie under the terminus building, was noteworthy for the preservation of medieval *organic artefacts* – a rare occurrence in Chester. The limits of the remains discovered just outside of and to the west of the development site were not found, and they therefore may well extend onto the site. The ?Roman clay extraction pits may be related to the debris from Roman pottery-making found in the area from 1970 onwards, and the kilns themselves could be situated nearby .

1.1.3 The preparation of the [Chester Archaeological Plan](#) (adopted in 2014 as an Evidence Base document for the CWaC Local Plan Part 2) necessitated a systematic and consistent assessment of the relative importance of archaeological remains across the city, using clear criteria. Among the criteria for ‘national significance’ on page 10 are:

- Well preserved remains of the Roman fortress and civilian settlement
- Saxon structures and features
- Cemeteries and burial groups
- Well-preserved organic remains

It is immediately clear from the evidence italicised in 1.1.1 and 1.1.2 that the remains already found on the Gorse Stacks site meet these criteria and that more could survive.

1.1.4 On the same page of the [Chester Archaeological Plan](#) we read: ‘... it should be remembered that in cases of national significance the removal of heritage assets should be considered wholly exceptional ...’. Notwithstanding any previous permissions, there is therefore a *prima facie* case for the preservation *in situ* of the archaeological remains on this site.

1.1.5 It is important to emphasise that what we have learnt from the trial excavations carried out so far – the hints of orderly Roman occupation in an area outside the fortress previously expected to be largely vacant, possible localisation of pottery manufacture, ?Saxon burials, medieval tile- and brick manufacture – represent significant advances in knowledge that could not have been predicted.

## 1.2 *The Threat from Development*

1.2.1 In the absence of detailed information on the groundworks that will necessarily accompany the proposed development it is impossible to be certain as to the precise threat to the below-ground archaeology. However, at this stage we have two general concerns:

- The vulnerability of the remains at the west end of the site because of their minimal depth below the existing ground level. It is unfortunate that these are the remains of the greatest significance. Ideally we should like to see new surfaces constructed at a higher level so as to avoid damage.
- The threat to the organic (presumably waterlogged) remains at the east end of the site. These may well be at a sufficient depth to avoid damage from new

foundations, but we are concerned that the construction of a covered building and impermeable surfaces may cause the archaeological deposits to dry out, with the consequent loss of organic material.

- 1.2.2 As the detailed design progresses, we should like the architects to carry out any further evaluations that the Development Control Archaeologist deems necessary, to hold timely discussions with him to minimise any threats, and to agree an appropriate programme of archaeological mitigation. (The 'watching brief' referred to in the *Design and Access Statement* page 13 is wholly inadequate).

## **2.0 Design**

- 2.1 We are pleased to see that the architects have taken seriously the design guidance relating to the area in the [Chester and Approaches Characterisation Study \(L\)](#) (LEB 29) and have recognised the poor quality of recent developments in the city, especially in George Street/Delamere Street area, that has resulted in negative public attitudes, including among historicist bodies such as this Society (*Design and Access Statement*, pages 8–12).
- 2.2 In terms of design we consider that in general the proposal meets the aspirations voiced in our response to the recent [Chester Bus Exchange Consultation](#), section 5.0.
- 2.3 Para 3.9 on page 8 of the *Design and Access Statement* makes reference to public art. We suggested in our response to the [Chester Bus Exchange Consultation](#), para 5.2, that any decoration of the building (eg possible etching of glass panels) should make reference to the history of the area. For example one might think of Roman pottery-making, medieval tile manufacture, extracts from historical maps, illustrations of the canal. We think this particularly appropriate for a building that will be situated in a part of the city where wholesale redevelopment in the 1960s swept away most reminders of the past.

## **3.0 Operational Matters**

- 3.1 For concerns about the suitability of the site for a bus interchange in terms of location, and suggestions as to how it might operate, we refer to our previous response to the [Chester Bus Exchange Consultation](#), especially sections 3.0 and 4.0.

Dr P Carrington FSA  
*For Chester Archaeological Society*  
9 November 2014