

## CHESTER ARCHAEOLOGICAL SOCIETY

### COMMENTS ON REPORT TO [STRATEGIC PLANNING COMMITTEE](#) 16-12-14 ITEM 6 RE PROPOSED GORSE STACKS BUS INTERCHANGE (APPLICATION [14/04539/FUL](#))

- 1.0 Our concern relates to the lack of any mention of the recently prepared [Chester Archaeological Plan](#) and the supporting [Archaeological Character Zones](#) document among the policies cited in the report, despite the fact that they were adopted by the Council in January 2014 as part of the Evidence Base for the emerging Local Plan, and the fact that the Local Plan is itself given weight in the report together with other supporting documents (paras 4.3 and 4.4). We consider that this is an important omission. These documents were intended to serve as starting points for the assessment and treatment of the archaeology of the city and we would now expect to see them cited in the consideration of all development proposals that may have archaeological implications.
- 2.0 The Gorse Stacks site falls within [Character Zone 33](#), one of the 'Primary Zones' of the [Chester Archaeological Plan](#) (page 15, fig 7). *Inter alia* the text concerning [Character Zone 33](#) states: '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' - a value judgement which is borne out when one compares the information in the *Historic Background and Assessment of the Site's Archaeological Potential* with the criteria set out on page 10 of the [Chester Archaeological Plan](#). The *Plan* goes on to say '... it should be remembered that in cases of national significance the removal of heritage assets should be considered wholly exceptional ...'. (See our [response](#) to the present application for the argument in detail).
- 3.0 Para 6.37 of the report states that wholesale excavation of archaeological deposits on the site had earlier been accepted in order to make possible the construction of new offices for the former Chester City Council. It would seem, therefore, that the perceived archaeological significance of the site has been considerably upgraded as a consequence of the preparation of the [Chester Archaeological Plan](#), and the desirable outcome of the present application should therefore be as much preservation *in situ* as possible. The preparation of the [Chester Archaeological Plan](#) necessitated a systematic and consistent assessment of the relative importance of archaeological remains across the city to replace the former reliance on *ad-hoc* judgements, and we therefore consider its assessment of significance to be preferable. Unfortunately English Heritage in their comments of 14 November, page 3, have made no substantive comments on the buried archaeology on the site and have effectively left the matter to the Cheshire Archaeology Planning Advisory Service; the content of the Development Control Archaeologist's comments on the present application is not available on the Council's website.
- 4.0 You may, of course, consider that, for some reason, [Chester Archaeological Plan](#) and the [Archaeological Character Zones](#) are irrelevant to the present application, in which case we believe that this should be openly stated and justified rather than their being simply ignored. Alternatively you may consider that the previous acceptance of wholesale excavation (ie without any attempt at preservation *in situ*) should prevail over the more recent assessment of the remains as having 'national significance' and therefore warranting preservation *in situ*; if so, again we consider that this should be

openly stated and justified. As a third option, given the completely different nature of the previous and present development proposals, we hope that you may conclude that the previous acceptance of wholesale excavation is now simply irrelevant and that, through discussion between the Development Control Archaeologist and the project architects and engineers, it is practical to seek a high degree of preservation which reflects the latest assessment of the significance of the archaeological remains on the site.

Dr P Carrington FSA  
*For Chester Archaeological Society*

13 December 2014