

## CHESTER ARCHAEOLOGICAL SOCIETY

### COMMENTS ON NORTHGATE DEVELOPMENT (16/02282/OUT) – PART 1

#### SUMMARY

*The Chester Archaeological Society continues to welcome many aspects of this development. However, important elements of the scheme seriously damage the city's unique character and 'drive a coach and horses' through clearly worded Council policies on urban design and conservation areas. These relate to the retention of historic streets on their traditional alignments; the height of buildings; and respect for topography, skyline and views of landmarks.*

*We are seriously concerned that determination to bring this long-delayed scheme to fruition could result in objections and policies that stand in the way of the present design being ignored. The result would be a development that might initially be welcomed but whose faults would soon be regretted and would be very difficult to rectify in the future.*

*We therefore call on the Council to require the improvements listed below:*

#### KEY RECOMMENDATIONS\*

- Retain Trinity Street in its current position as a highly significant part of Chester's historic street plan, which is of national importance. If possible relocate displaced parking to second underground level at east end of site. (Paras [3.3](#), [3.4](#), [3.8](#))
- Maintain other historic streets (Princess Street, Hamilton Place, Goss St) on their present alignments and levels. (Paras [3.3](#), [3.4](#))

*Maintenance of the current/recent alignments of historic streets should be a parameter in all phases of the development.*

- Restore the northern section of Crook Street to help create a townscape more sympathetic to topography. ([Para 3.5](#))
- Ensure a falling roofline from east to west and from north to south of c 45 to 38 AOD to restore and enhance the city's skyline and views into and out of the area. ([Section 4.2](#))

*These maximum heights should be a parameter in all phases of the development.*

- Accordingly reduce the height of hotel frontages to 38 m by relocating the plant room, by slightly curtailing the amount of parking and so enabling hotel facilities to be dropped one storey, and by stepping back upper storeys. ([Section 4.3](#))
- Locate the department store to the east of the present Trinity Street to reduce the impact of its bulk and height. ([Section 4.4](#))
- Retain existing Watergate Street facades of 14-20 Watergate Street properties and make other, detailed, changes to the proposal as argued in comments already submitted by the Conservation Area Advisory Panel. ([Section 5.0](#))
- Give more prominence to the display of the Roman Strongroom and integrate it with other Roman remains in the area. ([Section 6.0](#))

\* We have not attempted to deal with the phases of the development separately as the issues are too intertwined.

## DETAIL

### 1.0 Processes, Policies, Precedents and Problems

- 1.1 This is the third set of comments that the Chester Archaeological Society has prepared in respect of the current (H2) scheme over the past six months.\* Regrettably these earlier comments have been ignored. The points made here therefore largely repeat our earlier comments addressed to the planning consultants, in which we spelled out the weaknesses of key parts of the scheme in terms of its disregard for local character and its failure to comply with detailed Council policies and guidance.†
- 1.2 In a Council-led development scheme in the heart of the Chester city centre conservation area we would have hoped for an exemplary observance of planning policies. If these policies are ignored in such a case then clearly their credibility is damaged and one cannot expect other developers to respect them. We are aware that the Northgate development has now been under discussion for many years and carries many hopes for a revival of Chester's retail fortunes. We are therefore naturally concerned that determination to bring this long-delayed scheme to fruition could result in objections and policies that are perceived to stand in its way being ignored in desperation to 'get something done' and in case financial backers walk away.‡
- 1.3 Because of the poor quality of the present buildings, this is a development that might initially be welcomed. However, we consider that it would soon be regretted as in parts grossly out of scale, destructive of the historic grain and insensitive to the topography of this part of the city. In some ways its crude approach represents little advance on the comparable developments of the 1960s (the present Forum, built for the then County Borough Council, and the Grosvenor Centre), which were highly praised at the time of their construction but are now criticised for their 'transitory' architectural style, for their scale, and for having destroyed large areas of the historic grain of the city, ... leading to the 'hope ... [for] replacements ... that are genuinely innovative in their design whilst preserving and enhancing the city's character' (*Sustainable Growth of Cathedral Cities and Historic Towns*, pages 63 and 122). Some recent major developments in the Chester city centre conservation area have been of disappointing quality (to say the least), for example the former Northgate Travelodge and the Delamere Street health centre (with a senior local NHS officer echoing earlier criticisms made by this Society, the Chester Civic Trust, English Heritage and others: <http://www.chesterchronicle.co.uk/news/chestercheshire-news/nhs-bosses-admit-delamere-street-7779546>), which have reduced the

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\* See previously [Comments on Northgate Summary Masterplan Report 2015](#) and [Comments on Northgate March 2016 Iteration](#). Here it is appropriate to thank the project team, especially G L Hearn, for their courtesy during the consultation period.

† especially [Chester District Local Plan Retained Policies](#); [Chester and Approaches Characterisation Study. A: Central Area](#); the Chester Archaeological Database [Character Zone 7: Princess Street](#); the draft [Houses in Multiple Occupation and Student Accommodation SPD March 2016](#).

‡ The Historic England report *Sustainable Growth of Cathedral Cities and Historic Towns*, pages 64 and 129, referring specifically to Chester, states the issue baldly: '... in a buoyant economic climate, planning authorities feel themselves able to take a much more robust approach in their negotiations with developers either in terms of the scale of proposals or the overall quality of design. When markets are depressed it is much harder to achieve this as there is a fear that if pushed too hard, developers will simply walk away from a scheme.'

intervening street to a canyon. In such a central and prominent site as Northgate it is essential that the Council insists on the highest design standards; the present scheme should not be accepted with regret as the best that can be achieved.

- 1.4 The proposed development attempts to compete with out-of-town retail parks head-on. In so doing it effectively treats the Northgate area as a greenfield site rather than as one in a highly sensitive part of one of England's major historic cities, with the constraints and opportunities that should imply. The city may need new retail spaces and more parking, but that does not justify over-intensive development of this key area; there are other areas that would benefit from renewal and would be less problematical. Chester will not succeed in the longer term by sacrificing the character of its historic core; rather it needs to 'play the heritage card' as hard as it can, not just in the form of specific monuments such as the City Walls, amphitheatre etc but through far more general qualities that contrast with the globalised blandness of retail parks.

## 2.0 Character of the Area and Summary of Concerns

- 2.1 The Chester Archaeological Database '[Character Zone 7: Princess Street](#)' summarises the area as being historically defined by its medieval north-south streets that formerly gave access to small townhouses and cottages and later to several chapels, Victorian courts and industrial buildings – all swept away, except for the streets themselves, by the 1960s redevelopment. The below-ground archaeology consists of Roman barracks at the north and south ends of the area with workshops in the middle. Saxon reuse of the Roman defences was found under the Trinity Street car park. Despite the 1960s redevelopment, there is the potential for archaeology of at least national importance to survive under streets and other open areas. The [Chester and Approaches Characterisation Study A-L](#) writes the whole of the area off in its present state as 'negative' with the exception of buildings on its periphery (pages 64, 66): 'City centre edge, indoor market, shopping mall, theatre and open bus station. 1960s buildings with some interesting artwork. Large scale uses out of scale with the townscape within the Walls'.
- 2.2 Our concerns relate primarily to the loss and/or realignment of the historic streets of the area, with consequent threats to buried archaeology, and to the excessive height of the proposed buildings along St Martins Way. These problems arise in large part from the strategy of imposing a level floorplate across the site, obliterating the slope that is a characteristic of the western side of the city and gives it a distinctive skyline.

## 3.0 Historic Street Plan

*It is perverse that the development should revive random elements of short-lived industrial-era streets that were swept away in the 1930s while destroying or substantially altering much older, more meaningful, streets that survive to this day. In accordance with Council policy the latter should be preserved, enhanced and restored where necessary for their heritage value and to improve the integration of the Northgate area into the rest of the city.*

***[Retained Policy ENV 39](#) states unequivocally: 'Development proposals which would result in the loss of any historic routes in the city centre will not be permitted. ... The plan form of Chester has remained mostly intact since Roman times and there should be no further loss of any routes, however small'.***

- 3.1 The [Townscape Heritage and Visual Impact Assessment](#) states (page 38): ‘the Market area suffered gradual erosion throughout the middle of the 20th century. Th[is] area neither retain[s its] street patterns, built form or many historic buildings within [its] core’. As regards the loss of historic streets this statement is seriously misleading. What was lost were largely short-lived industrial-era courts. The much older streets that formed the long-term framework of the area – Goss Street, Crook Street, Trinity Street, Hamilton Place and Princess Street – survive little altered, albeit with the loss of the northern half of Crook Street.
- 3.2 Streets are archaeological monuments in their own right, regardless of the quality of the buildings that happen to line them at any particular time, and even when new surfaces are laid and earlier ones partly destroyed by the insertion or renewal of services, their alignments are still precious evidence for the history of the city; they are the ‘fabric’ on which the ‘tapestry’ of Chester has been woven. The survival of so much of its historic street plan is fundamental to the city’s character and is of national importance; it and should be preserved, restored where appropriate and enhanced. The origins of Eastgate Street, Watergate Street, Bridge Street and part of Northgate Street in the major streets of the Roman fortress are well known. However, many other streets are also of ancient origin and reflect important stages in Chester’s evolution.
- 3.3 Trinity Street is one of the most significant minor ancient routes of the city. Along with St Martins Way it ‘sandwiches’ the line of the lost Roman western defences. Similar pairings are found further south with Weaver Street/Nicholas Street and Whitefriars/Cuppin Street, the latter sandwiching part of the lost southern defences. These streets were clearly established when the defences were still a significant landscape feature, perhaps in the late Saxon period, when we know that the defences at Linenhall Street were refurbished, but certainly by the early Middle Ages. The southern part of Crook Street is Roman in origin and was reused in the Saxon period; Goss Street and Hamilton Place are possibly also Saxon. The northern (lost) part of Crook Street was probably laid out in the Middle Ages to connect with Princess Street, another medieval creation, and formed the ‘spine’ around which the area developed; its alignment suggests that it threaded its way between the remains of a series of Roman buildings. These streets are thus part of the long-term plan form of the city (see the Chester Archaeological Database [Character Zone 7: Princess Street](#)).
- 3.4 The abolition of Trinity Street would represent a major loss to the integrity of a highly significant group of streets, and its ‘reinstatement’ on a totally different alignment would have absolutely no historical authenticity or significance. This disregard for an ancient street mirrors the insensitivity shown when the Grosvenor Shopping Centre truncated Newgate Street, which pre-dated the Norman Conquest, and when the current Forum development obliterated the northern half of Crook Street. Even when it is proposed to preserve historic streets, their horizontal alignments are changed significantly (especially Hamilton Place) or their levels, with the insertion of steps at the western end of Princess Street and near the surviving southern end of Trinity Street. Given that these alignments have survived for centuries, if not millennia, we would oppose any unnecessary changes and where practical should like to see the opportunity taken to restore their pre-1960 widths, before large, freestanding buildings began to break down traditional patterns.

- 3.5 The restoration of the lost northern half of Crook Street, which was a feature of the earlier Hopkins scheme, ING Options 10 and 12 and the 2013 Concept Scheme (Acme: *Chester Northgate Masterplan Scheme Presentation*, December 2012, page 32 and section 7), has been dropped: there is now only a narrow alley and courtyard in the block south of Princess Street. This restoration would inevitably lack a degree of historical authenticity but would be invaluable in terms of townscape (see 4.1 and 4.3 below).
- 3.6 A benefit of retaining the historic streets in the area without changes to their levels would be the avoidance of the need for steps near the Guildhall and at the western end of Princess Street. Steps are not only a practical and safety problem (for those with shopping, pushchairs and young children, as well as for those with serious mobility difficulties); they also separate areas visually and psychologically: ie they would mark off the Northgate area from surrounding parts of the city when historically it has always been an integral part of it.
- 3.7 As a result of this disregard for the historic street plan, the surviving southern ends of Trinity Street and Crook Street could become further disused and neglected. One may compare the [Chester Characterisation Study. A: Central Area](#) comments on Newgate Street (page 65): 'Fragmented street remnant amongst Grosvenor Centre. Still some buildings of merit but in a very poor setting'. These streets do not deserve this fate. Rather than being destroyed or sidelined, they should be valued, maintained (and in the case of Crook Street restored) and enhanced for their evidential heritage value and as contributing to the overall historical character of the city.<sup>§</sup>
- 3.8 The retention of Trinity Street would involve the loss of a narrow strip of proposed car parking. If it were deemed essential, could this not be compensated for, at least in part, by a second, lower, level of parking at the eastern end of the site, assuming archaeology has already been destroyed in that area?
- 3.9 Finally, retention of historic streets on their current alignments would minimise damage to underlying archaeology.
- 3.10 Maintenance of the current/recent alignments of historic streets should therefore be a parameter in all phases of the development.
- 3.11 *Relevant Policies/Advice*
- 3.11.1 The Chester Archaeological Database [Character Zone 7: Princess Street](#) states:
- A higher level of preservation may be expected to the north of Princess Street where modern redevelopment has been limited. *Open areas such as car parks and roads to the south [of Princess Street] are likely to have the strongest preservation potential and should be treated with the greatest sensitivity. [Our italics]*
- 3.11.2 This whole area of the city is one of the 'Primary Zones' of the [Chester Archaeological Plan](#), and the presumption is that remains here should be preserved *in situ* (page 15, fig 7 and 16, para 33). In our view, preservation wherever possible is all the more important given that so many earlier excavations in the area have not been published, and thus the understanding that should precede further excavation does not exist.

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<sup>§</sup> 'Power of Place highlighted that people place a high value on the historic environment and see it in its totality, rather than as a series of individual sites and buildings'. (Quoted in [Sustainable Growth of Cathedral Cities and Historic Towns](#), page 53)

3.11.3 [Chester District Local Plan Retained Policy](#) ENV 5:

Development which would result in the loss of streets, lanes and courts, *or an alteration to their widths or alignments* will be permitted only where it enhances or preserves the historic integrity of the urban grain or plan form of the settlement. [*Our italics*]

*Reason/Explanation*

All new development is expected to contribute positively to the urban grain or plan form of settlements. *Historic patterns and routes should be respected, and enhanced where appropriate.* The public realm should be rich in the opportunities it offers, with clear and well designed routes that are open to the public at all times. [*Our italics*]

3.11.4 [Chester District Local Plan Retained Policy](#) ENV 37:

Development in conservation areas or affecting the setting of such an area will only be permitted where it will preserve or enhance its character or appearance. ... hav[ing] regard to the effect of the following criteria and the impact of any development on the immediate surroundings of the site, the broader townscape or its landscape setting:

(*inter alia*)

- the retention of ancient and historic thoroughfares

3.11.5 [Chester District Local Plan Retained Policy](#) ENV 39:

*Development proposals which would result in the loss of any historic routes in the city centre will not be permitted. Development schemes which would result in the reinstatement of any historic routes in the city centre will be permitted as and when they arise.*

*Reason/Explanation*

*The plan form of Chester has remained mostly intact since Roman times and there should be no further loss of any routes, however small. The tight historic grain of the city centre is key in defining its character and should be retained and strengthened wherever possible. [Our italics]*

3.11.6 The [Chester Characterisation Study A: Central Area](#), page 104 states:

The Market area offers potential for a more comprehensive redevelopment. This needs to be mindful of the following considerations (*inter alia*):

- re-instating the historic grain of the area by providing north–south routes through the development blocks. *Where possible these should align with historic routes such as the extension of Crook Street to Princess Street. [Our italics]*

#### 4.0 Impact of New Buildings

*The proposed new buildings along St Martins Way are wholly out of scale in elevation and plan: they create a ‘defensive wall’ along the side of the street, impede views into and out of the city centre and diminish local landmarks.*

[Retained Policy](#) Section C Urban Design para 3.33 states: ‘**Some redevelopment schemes in the past have adversely affected the character, and particularly the skyline, of the city, e.g. ... Moathouse Hotel (ie the Crowne Plaza) and Hamilton House. These are not to be used to set the precedent for future development’.**

*This is precisely what the proposed development does. The analysis of long views of the western side of the city in the Townscape Heritage and Visual Impact Assessment makes it clear that the result would be worse, not better.*

*The large, level floorplans of the proposed buildings make it difficult for them to respond sympathetically to the inherited street plan or sloping terrain.*

The [Chester and Approaches Characterisation Study A-L](#) (page 64) clearly warns: ‘**Large scale uses out of scale with the townscape within the Walls’.**

#### 4.1 *Topography*

4.1.1 The existing topography of the development area is domed, with increasing gradients to the west and south. Historically, Crook Street and Trinity Street divided the area into narrow north–south strips, resulting in development that followed the contours in terraces one above the other and producing a rising skyline. Larger buildings such as the Old Market Hall were concentrated on the level ground at the east end of the area. This traditional grain was replaced in the 1960s by the much larger scale, level, Forum development which cut across the contours, resulting in a ‘cliff edge’ on Trinity Street. Contrary to the advice in the [Chester and Approaches Characterisation Study](#) quoted above, the proposed development extends the level floorplate further, west to St Martins Way and north to Hunter Street, to accommodate new, relatively large, buildings again running across the contours, such as the department store and hotel. Thus the natural topography is obliterated, there is no rising roofscape that would provide a context for landmark buildings such the Town Hall and Cathedral, and the new ‘cliff edge’ on St Martins Way is even higher. The damage done in the 1960s cannot wholly be undone, nor could the further damage now proposed. However, the preservation of Trinity Street and the restoration of the northern part of Crook Street, at c 25m and 27.5m AOD respectively (desirable on heritage grounds, as argued above), would once again divide the area into north-south strips into which buildings could be fitted in a way more sympathetic to the topography.

#### 4.2. *Building Heights*

- 4.2.1 The height of the frontage of the hotel along St Martins Way is planned to be 45.7m AOD, rising to 50.7m along Princess Street. Thus the former would be higher than the main ridge of the present Crowne Plaza hotel and the maximum height would be approximately the same as the ridge of the Town Hall.
- 4.2.2 The department store is currently planned to be 45.0–48.5m high, ie equal to or higher than the main ridge of the present Crowne Plaza hotel. Peacock Court is planned to rise to 40-45m AOD. Block NG 16 would rise to about 40m AOD.
- 4.2.3 At close quarters the frontages of these buildings would present a dominating appearance wholly out of scale with other buildings along St Martins Way, existing and projected. Indeed, with their generally slab-like walls rising sheer from the street, they would look even more out of scale than the present hotel, which steps back from the street at a height of c 36m AOD. The prominence of the store is suggestive of a brash commercialism that is out of place in Chester. The cumulative impact of these buildings (especially given their high, massive podia) would be to create an uninviting, ‘fortress-like’ wall along the eastern side of St Martins Way.
- 4.2.4 In long views of the city from the west the cumulative effect of the new buildings with their generally flat roofs would be even more dominant than the existing hotel, providing no contextual roofscape for the Town Hall and diminishing the Guildhall - both landmark buildings. This harm is admitted in the analysis of long views of the development in the [Townscape Heritage and Visual Impact Assessment](#) (THVIA) pages 19-22. Given that it is recognised that the existing hotel damages the skyline of the city, any further damage should be wholly unacceptable; rather, significant improvements should be expected.
- 4.2.5 Extraordinarily, despite recognising that the impact of the buildings on the western side of the development is harmful, the THVIA proceeds to justify their height by

reference to the ridge of the Town Hall roof, the height of the existing hotel and the Guildhall spire (pages 37 and 43-4). This is special pleading for untenable designs and ignores the Council policies that specifically state that the height of the existing hotel is not to be used as a precedent and seek to protect the prominence and contextual roofscapes of landmark buildings.

- 4.2.6 It is also worth quoting parts of the Civic Trust's objection to the proposed student housing at Hunter Street (15/04014/FUL), referring to the threat of a new 'wall of buildings [that] will obscure the older core and erode its nationally important historic character':

*If approved, the proposed scheme is likely to set a most unfortunate precedent for future tall buildings surrounding the city core and in close proximity to the Walls. ... If this gradually increasing height of buildings surrounding the historic city core is allowed to continue then a new city 'wall' of buildings will obscure the older core and erode its nationally important historic character. ... The design and access statement that accompanies the planning application tries to justify the proposed height of the building as 6-8 storeys as being in context with the existing height of the Crowne Plaza Hotel and the proposed height of its replacement at 8 storeys, together with the 5-6 storey height of the proposed student accommodation fronting St Martin's Way at Linenhall. However ... [t]he development opposite is 3 storeys from road level with a further basement level. Therefore the building heights of the Crowne Plaza, its proposed replacement hotel and the un-built Linenhall development are already out of scale with the predominant local and historical 3-4 storeys. Close to the site are other examples of new development that have abided by the scale of the historic city. These are the apartments on the former Royal Infirmary Site and student accommodation on Powys Court. To justify the height of a new student accommodation building by reference to the precedent of those that are already, or (if built) out of scale with the local townscape, is totally inconsistent with good design. [Our italics]*

Planning Committee rejected this application, citing [Retained Policy](#) ENV 37 and specifically expressing concerns about its height, scale and massing. If there is to be any consistency in decision-making, the present designs for the St Martins Way frontage of the Northgate development should also be rejected.

- 4.2.7 The as-yet unbuilt Linenhall student housing (13/03210/FUL) is also prayed in aid of the proposed height of the St Martins Way buildings of the Northgate development. However, whatever faults the Linenhall building may have, it makes some concessions to the landscape and local character: its maximum height is c 38m AOD (ie below the ridgeline of the Guildhall), the roofline steps down from east to west to mirror the prevailing contours, and the St Martin's Way frontage is divided into narrow bays with brickwork in alternating colours and metal-clad attic storeys that rise from a different level on each bay to create variety.
- 4.2.8 We therefore strongly urge that the buildings on the Northgate site fronting onto St Martins Way adopt a maximum height of 38m AOD, with those further to the east being allowed to rise to a maximum of c 45m (approximate eaves level of the Town Hall), reflecting the domed topography of the area.
- 4.2.9 These maximum heights should be a parameter in all phases of the development.

### 4.3 *Hotel*

- 4.3.1 As indicated above we consider the proposed height of the hotel along the St Martins Way and Princess Street frontages unacceptable, while the 7m-high podium is even more defensive than that of the service bay to the south. Advantage should be taken of the excavation for the site of the former St Martins House to locate public hotel

rooms at street level, creating a more active frontage; this would require relocating the plant room. With a small cost in parking capacity other hotel areas, eg the lounge and Princess Street entrance, should be dropped one storey (which would bring the entrance near to the existing level of Princess Street). Finally, the upper storeys of the hotel should be set back from the street frontages, as is the case with the present hotel. Princess Street as proposed looks particularly canyon-like.

#### 4.4 *Location of Department Store*

4.4.1 Accommodating the relatively large floorplate of this store, at over 50 x 50m, on a central site in a city such as Chester (or indeed any historical city that has preserved its historic street pattern, such as York or Lincoln) is problematical, especially on the edge of an area with an increasing gradient. It would be more easily accommodated in flatter areas of the city, for instance along Pepper Street or Foregate Street, where the urban grain is also looser. It is ironic that such a large building is being proposed on a site that is intrinsically unsuitable at a time when the former Habitat site on Pepper Street has recently been subdivided into restaurants, when the former Marks & Spencer menswear section on Foregate Street has likewise been subdivided, and when BHS is closing. If such a store is to be included in the Northgate development it would be better sited between Trinity Street and a reinstated Crook Street, where the gradient is rather less and its height would be less obtrusive against the backdrop of the Town Hall. Even so its height should be kept to a minimum.

4.4.2 We have previously suggested that the block between Trinity Street and St Martins Way could instead be used for housing (as is already proposed for a small area of it, at Peacock Court). Such a use would be far more in keeping with the scale of other buildings along St Martins Way and could incorporate on-site parking for residents and perhaps a terrace along the top of the podium.

#### 4.5 *Relevant Policies/Advice*

4.5.1 The [Chester District Plan Retained Policy](#) Section C Urban Design para 3.33 states:

Some redevelopment schemes in the past have adversely affected the character, and particularly the skyline, of the city, e.g. Commerce House, Moathouse Hotel (ie the Crowne Plaza) and Hamilton House. *These are not to be used to set the precedent for future development. [Our italics]*

4.5.2 Likewise the [Chester and Approaches Characterisation Study. A: Central Area](#) page 61 characterises the present hotel building as:

a key detractor ... highly visible because of its size and bulk [with] a very thin and crude veneer of "Chester Black and White". Its design pays no heed to the grain of the city.

Of the market area in general it says (page 101):

Large scale uses out of scale with the townscape within the Walls. *[Our italics]*

4.5.3 [Chester District Local Plan Retained Policy](#) ENV 12:

Development and redevelopment of sites along the inner ring road that would provide a strong and active frontage will be permitted. In determining planning applications the Council will have regard to the degree to which the scheme preserves or enhances the character or appearance of the area.

*Inter alia:*

An active built frontage is one where:

- the ground floor of the development is occupied by uses that generate pedestrian activity and interest to passers-by (such as shops and restaurants).

4.5.4 [Chester District Plan Retained Policy](#) ENV 8 states:

New development in Chester city which would obscure important views or lessen the visual impact of historic buildings, landmarks or landscape features through excessive height, mass or bulk or through the development of key open spaces which provide views through, frame views or provide a setting for them will be refused.

*Reason/Explanation*

*Inter alia*

- *The roofscape is an important factor in defining the skyline of the historic city due to the topography of the settlement. The roofscape reflects the historic fabric and provides a wealth of interest and should be a key element in the design of any new development. [Our italics]*

Key Inward View 18: Roodee, City Walls & skyline from footbridge & railway viaduct, is particularly relevant. The Town Hall, Cathedral and Guildhall are listed among landmarks.

4.5.5 Likewise [Chester District Plan Retained Policy](#) ENV 38:

Planning permission will not be granted for new developments that will obstruct important views within, or views in or out of, conservation areas

4.5.6 Again, [Chester District Plan Retained Policy](#) ENV 40:

Development proposals that would adversely affect the historic skyline of the city centre will not be permitted.

*Reason/Explanation*

The skyline of Chester provides the first impression of the historic city for visitors. *The most important elements of the historic skyline consist of the Cathedral Tower, the Town Hall Tower, church spires and the general roofscape which provides their context.* It has remained relatively unscathed and should be protected to provide an indicator of the quality historic fabric of the city. *[Our italics]*

4.5.7 Finally, the draft [Houses in Multiple Occupation and Student Accommodation SPD March 2016](#) section 3 reiterates many of these principles:

D: The layout, appearance, scale, height and massing of new development must respect its setting and not unacceptably harm the character of the surrounding area.

- ... regard must be had to safeguarding the historic environment of the city centre, including its historic skyline.
- The *cumulative impacts* of the scale, height and massing of new developments will also be taken into account where relevant. *[Our italics]*

We do not see how such principles can apply to student accommodation but not to other developments.

## 5.0 14-20 Watergate Street

5.1 We support the comments of the Conservation Area Advisory Panel regarding this refurbishment. The advice of Historic England should also be heeded. The major points are that Watergate Street facades of these buildings are good examples of their period and should be left unchanged and that the construction of a new ramp at the side of Goss Street, opening up the street, is supported.

## 6.0 Roman Strongroom

6.1 The project website suggests that these remains are to be covered over and viewed through a raised 'porthole' in the pavement. This minimalist approach to heritage is similar to the display of Liverpool's first wet dock, which can normally only be viewed

through a floor-level window in Chavasse Park (if it can be found!). Chester's Roman remains deserve better than this. The Strongroom should be at least as visible as it is at present and ideally should be displayed in relation to the column bases of the headquarters building in the basement of 23 Northgate Street

Dr P Carrington FSA

*For Chester Archaeological Society*

5 July 2016