

**CHESTER ARCHAEOLOGICAL SOCIETY**

**COMMENTS ON PLANNING APPLICATION FOR 15-19 NEWGATE STREET  
(18/01456/FUL)**

**1.0 Introduction**

1.1 The Society welcomes the proposal to bring these Grade II Listed eighteenth-century town houses back into use for residential accommodation, with apparently minimal alterations to the exteriors and sympathetic restoration of the interiors. A new rear extension is also in principle acceptable; however, as shown in the planning application, the proposed extension adjacent to the City Walls gives rise to a number of serious concerns.

**2.0 Impact on the City Walls and related archaeology**

2.1 In this sector, Chester’s defences are complex, with the medieval/present-day wall running behind its Roman predecessor, over the remains of the Roman turf rampart and interval towers. To the west of these features would have lain rampart buildings and the *via sagularis*/intervallum road that ran around the inside of the Roman defences. In other sectors the *via sagularis* is known to have been partially overlain by a late Saxon road. This road may not have existed here, its role being filled by Newgate Street, but late Saxon occupation along the latter is attested in Domesday Book. Archaeological investigations in this sector have tended to be outside the walls, and insufficient is known of what lies immediately to their west; this includes the character and significance of the bank that lies against the inner face of the walls within the development site.

2.2 One submitted plan suggests that the extension would come to within c 1 m of the City Walls. (No gap at all is shown in the plan on page 36 of the heritage assessment). Depending on levels and state of survival, the foundations of the proposed extension could damage the tail of the Roman rampart (preserved within the bank against the walls?), an interval tower and possibly the *via sagularis* and associated roadside drain, as well as any Saxon remains. Given that the medieval/present City Wall may only be founded on the soft material of the Roman rampart, there is also a risk that it could be destabilised by any earthmoving.

2.3 The City Walls are a Scheduled Ancient Monument, and any impact on them would require Scheduled Monument Consent. It is unclear whether consent would be required for the other elements of the defences that might be affected. In the past Historic England have required consent for works within 5m/15’ of designated monuments. In addition, the whole of the Abbey Green area, which contains similar elements, is scheduled.

2.4 NPPF para 132 states: ‘Substantial harm to or loss of designated heritage assets of the highest significance, notably scheduled monuments, protected wreck sites, battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.’

Para 139 states: ‘Non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.’

2.5 To comply with the requirements of NPPF, the proposed extension and any other new works should therefore be designed to avoid damage to the City Walls and associated below-ground archaeology. This can only be achieved with detailed information to be gained from pre-determination evaluation. As a matter of good practice, maximum use should be made of existing foundation trenches.

### **3.0 Visual impact**

- 3.1 The heritage assessment submitted in support of the planning application states (page 36): 'The extension will only be seen from the City Walls and the adjoining car park, both of which are not considered key views.' This assertion cannot be allowed to stand. In fact, it is probable that more people will see the extension from the City Walls than will see the frontages of the original buildings on Newgate Street, which is now a dead-end.
- 3.2 NPPF para 137 states: 'Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.'
- 3.3 Between the Eastgate and the Newgate there are several modern buildings backing onto and dominating the City Walls that are of undistinguished or poor design, especially the multi-story car park. For instance, the *Chester City Centre and Approaches Characterisation Study*, page 61, states: 'The multi storey car park offers a brutal frontage to the street, detracting from some pleasant buildings and concealing a listed church.' By contrast, on the development site the present outriggers, admittedly undistinguished but low-rise and unobjectionable, permit intriguing views from City Walls of the small-scale, staggered backs and varied roofscapes of the street-front buildings.
- 3.4 It is essential that the views from the City Walls are enhanced rather than further damaged. The proposed extension is deliberately contemporary in design and presents a single, relatively large, plain cuboid that contrasts with the staggered back walls of the town houses with their rhythmical pitched roofs. The horizontal emphasis of the new block, created by the long straight lines of the balconies and roof, reflects the car park beyond rather than the street-front buildings of which it is supposedly an extension. It might be more sympathetic to these latter buildings if these horizontal lines were broken up and the façade given more of a vertical emphasis. In terms of scale, the extension does not dominate the existing buildings but one may question whether, as an extension, it should not be lower. 'Green walls' are shown on the north and east walls of the building. These are an admirable idea, but if they were not maintained the result would be very poor.
- 3.5 In conclusion we are not convinced that enough thought has been given by the developers to producing the high-quality design needed for this sensitive location.

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*For Chester Archaeological Society*

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