

## CHESTER ARCHAEOLOGICAL SOCIETY

### COMMENTS ON NORTHGATE DEVELOPMENT MARCH 2016 ITERATION

#### SUMMARY

*The Society welcomes the detailed refinements now suggested for the Northgate development but is alert to the fact that most of these relate to Phase 2 of the scheme, for which only outline planning permission is initially being sought and are so merely indicative.*

*We are disappointed that the broader inconsistencies with Council policies on the historic environment and urban design that we pointed out earlier have not been addressed. These relate to the sensitive treatment of buried archaeology; the retention of historic streets on their traditional alignments; the height of buildings, and respect for topography, skyline and views of landmarks and more generally into and out of the area.*

*We consider that these problems could easily be overcome. However, we are 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 effectively being ignored. The result would be a development that might initially be welcomed but would soon be recognised as in parts grossly out of scale and destructive of local character.*

#### DETAIL

##### 1.0 Introduction

- 1.1 These comments refer to the information presented to stakeholders at a consultation meeting on 16 March 2016 and in part available on the project website [www.chesternorthgate.com](http://www.chesternorthgate.com) (accessed 28-03-16).
- 1.2 The Society welcomes many of the refinements now suggested but considers that the wider failure of the scheme to comply with a variety of Council policies and advice statements on the historic environment and urban design will lead to a result that will soon be regretted.
- 1.3 We therefore seek:

##### *Phase 1 Area (Detailed planning permission)*

- Sufficient gap between construction levels and well preserved archaeology to assure avoidance of damage to the latter ([4.1.1](#))
- Reducing the excessive height of the hotel at St Martins Way by moving the bus stop, thus creating the possibility of an active frontage in this area ([6.2.7](#)).

##### *Phase 2 (Outline planning permission)*

- Clear information on the character and condition of archaeology under Trinity Street before there is any acceptance that it can be removed *en bloc* ([4.2.1](#)).
- Requirement for the design of groundworks elsewhere in the area to be agreed with the Development Control Archaeologist before detailed permission is sought ([4.2.2](#)).

- Retention of Trinity Street and other historic streets (Princess Street, Hamilton Place, Goss St) on their present/historic alignments and levels, and the restoration of the northern section of Crook Street ([5.1](#)).
- The relocation of the envisaged parking on the present site of Trinity Street to a second underground level at the eastern end of the Northgate site ([5.1.1](#)).
- A rising roofline from west to east, from c 38 to 45m AOD to restore and enhance the city's skyline and views into and out of the area ([6.2.6](#)).
- Location of the department store to the east of Trinity Street to reduce the impact of its bulk and height ([6.2.8](#)).

## 2.0 Welcome Refinements since 2015

2.1 From the point of view of design the Society welcomes many of the detailed refinements that are now suggested, eg:

- Surfacing of historic streets in stone setts and of squares in flags; visual minimisation of the service road.
- Restricting the canopy in the Market Square to the market building itself.
- The principle of giving the individual faces of buildings different architectural treatments.
- The suggested architectural styles, with a variety of forms, materials and detailing to create visual interest.
- The new proposals 14–20 Watergate Street with the associated restoration of the south end of Goss Street to its earlier width (although this is a separate application from the Northgate development).

2.2 However, it is important to note that most of these refinements relate to Phase 2 of development, for which only outline planning permission is initially to be sought, and can therefore only be taken as an indication of what could be built.

## 3.0 Remaining Problems: Background and Summary

3.1 We are disappointed that the latest proposals continue to ignore existing and emerging Council policies and advice\* on the sensitive treatment of buried archaeology, the retention of historic streets on their traditional alignments, the scale of buildings and respect for topography, skyline, and views both of landmarks (especially the Guildhall and Town Hall) and more generally into and out of the area. We raised these concerns in our previous submission, [Comments on Northgate Summary Masterplan Report 2015](#), and we repeat some of the statements in that document here.

3.2 In a Council-led scheme we would have hoped for an exemplary observance of planning policies. If explicit guidance is ignored in such a case then clearly the credibility of those policies is damaged and one cannot expect other developers to

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\* eg [Chester District Local Plan Retained Policies](#); [Chester and Approaches Characterisation Study. A: Central Area](#); the draft [Houses in Multiple Occupation and Student Accommodation SPD March 2016](#); the Chester Archaeological Database [Character Zone 7: Princess Street](#); and the [Local Plan \(Part Two\) Draft Outline Historic Environment Policy Direction](#)

respect them. However, 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 effectively being ignored in desperation to 'get something done' and in case financial backers walk away.<sup>†</sup> In our view the result would be a development that might initially be welcomed but would soon be recognised as in parts grossly out of scale and destructive of local character. It would thus represent no 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 plus well preserved archaeology of international significance, 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).

3.3 As we have argued before, the plan of an 'ideal' retail environment more suited to a greenfield site is being imposed on the area, rather than the development being shaped by the pre-existing, meaningful and sensitive framework of the historic city centre. There is no argument that the Northgate area needs redevelopment. However, the city cannot out-compete out-of-town shopping centres by offering 'ideal' retail spaces, no matter how much of its heritage it sacrifices; rather, it needs to attract longer-staying visitors/customers by 'playing the heritage card' as hard as it can, not just in the form of specific monuments such as the City Walls, Cathedral, amphitheatre etc, but through far more general and more subtle qualities of authentic historical character and local distinctiveness. Again, to quote [Sustainable Growth of Cathedral Cities and Historic Towns](#), page 53: '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'.

3.4 The problems that arise are:

- There is an assumption that archaeology under Trinity Street can be removed wholesale in order to create new underground car parking, without any published field evaluation or desk-based assessment of the character, condition and significance of the relevant deposits. There also seems to be very little gap between the top of archaeology and finished car park surfaces north of Hunter Street.
- The abolition of Trinity Street – one of the most significant minor streets in Chester - in order to create another deck of car parking, with the department store above it.
- A failure to restore the lost medieval northern section of Crook Street, which has long been advocated and has been a feature of previous Northgate schemes.

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<sup>†</sup> The Historic England report [Sustainable Growth of Cathedral Cities and Historic Towns](#), pages 64 and 129, 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.'

- The heights of the department store and new hotel being c 43.50–47.00m and 46.90m AOD respectively on the St Martins Way frontage (ie in the region of the existing Crowne Plaza hotel), as a consequence of putting a 20-m high (4 x 5m storey) store over the proposed service bay and having a bus stop under the frontage of the hotel.

## 4.0 Impact on Below-Ground Archaeology

### 4.1 Market/Hotel Area (Phase 1)

4.1.1 We understand that the floor level of the lowest level of car parking is to be at 26.50m, in an area where well preserved, significant archaeology survives at c 26m AOD. Even with this 50cm gap, when allowance is made for foundations, underground services and machine churn there could be significant damage to archaeology. The details of groundworks in this area need to be agreed with the Council's Development Control Archaeologist before an application is submitted.

### 4.2 South of Princess Street (Phase 2)

4.2.1 The extension of underground parking between the present Forum site and the Trinity Street car park, at 22.50m AOD, is predicated on the wholesale removal of surviving archaeological deposits under the present Trinity Street. The major remains that would be expected are those of the principal Roman fortress workshops (*fabrica*). If the character and condition of surviving remains are known, either by desk-based assessment or field evaluation, they have not yet been publicly demonstrated. This needs to be done before any decision can be made about development affecting them. The gain in parking spaces in any case seems to be minimal.

4.2.2 The design of groundworks elsewhere in the area should be agreed with the Development Control Archaeologist on the basis of adequate information before detailed permission is sought, in order to minimise damage to archaeology.

### 4.3 Relevant Policies/Advice

4.3.1 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.

4.3.2 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 yet been published, and thus the understanding that should precede further excavation does not exist.

## 5.0 Historic Street Pattern

### 5.1 Princess Street and Southwards (Phases 1 and 2)

5.1.1 The scheme requires the abolition of Trinity Street on its present alignment in order to create another deck of car parking, with a department store above it. The 'reinstatement' of the street would lie c 15 m to the east and c 3.5 m higher. Trinity Street is one of the most significant minor historic 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. Its abolition would represent a major loss to the integrity of a highly significant group of streets, and its 'reinstatement' would have absolutely no historical authenticity or significance. Could the car parking lost through retaining Trinity Street not be replaced by a second, lower, level of parking at the eastern end of the site, given that, to the best of our knowledge, all archaeology in that area has been destroyed?

- 5.1.2 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 commended itself to us in townscape terms, although, as it could not follow the precise, sinuous route of the earlier street, it would inevitably lack a degree of historical authenticity. The southern part of Crook Street is Roman in origin (as are possibly Goss Street and Hamilton Place) and was reused in the Saxon period. The northern part of the 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.
- 5.1.3 Trinity Street, Crook Street, Goss Street, Hamilton Place and Princess Street are thus part of the long-term plan form of the city (again see the Chester Archaeological Database [Character Zone 7: Princess Street](#) and the *Chester Northgate Masterplan Presentation* (2012) page 16), and we consider that it is valid to distinguish between streets such as these and short-lived ones such as the nineteenth- and early twentieth-century Market Street, whose reinstatement would be no compensation for the loss of earlier streets.
- 5.1.4 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.
- 5.1.5 As a result of this disregard for the historic street plan one can imagine the surviving southern ends of Trinity Street and Crook Street becoming 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. On a practical level a result of severing or degrading these historical streets through the area would be to make accessibility worse except from the Town Hall Square and in particular to isolate the new development from the western end of Watergate Street (which in the 2013 scheme it was supposed to revitalise).

5.1.6 The intersection between the service road surrounding the development and the proposed public space at the north end of Goss Street needs to be thought through.

## 5.2 *Relevant Policies/Advice*

### 5.2.1 [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.

### 5.2.2 [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

### 5.2.3 [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*]

### 5.2.4 The [Chester Characterisation Study A: Central Area](#), page 104 likewise 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.

## 6.0 **Impact of New Buildings**

6.1 The key buildings are those fronting St Martins Way. Both their individual and cumulative impact need to be considered.

### 6.2 *Hotel (Phase 1) and Department Store (Phase 2)*

6.2.1 The height of the St Martins Way frontage of the hotel is currently planned to be 46.90m AOD, rising along Princess Street to 50.70m. Thus the former would be higher than the ridge of the present Crowne Plaza hotel and its maximum height would be approximately the same as the ridge of the Town Hall. Street level on St Martins Way is used for a bus drop-off.

- 6.2.2 The department store is currently planned to be 43.50–47.0m high, ie possibly slightly lower or higher than the ridge of the present Crowne Plaza hotel. Plans show it projecting forward slightly of the rest of the St Martins Way frontage in the area, and the latest image we have seen show a uniform surface treatment from street level to roof. (It is noteworthy that at the time of writing there is no image of this important façade on the project website). The level floorplate of the store, at c 50 x 50m, is also a relatively large one for a central site in a small city such as Chester. Such buildings have in the past tended to be accommodated in flatter areas of the city, especially along Foregate Street.
- 6.2.3 The frontages of these buildings would present a dominating, monolithic appearance wholly out of scale and character with neighbouring buildings, existing and projected. Indeed, at close quarters, their slab-like appearance rising sheer from St Martins Way 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 the city centre. The cumulative impact of the buildings (especially given the service bay and the proposed bus stop at street level) would be to create an uninviting, ‘fortress-like’ wall along the eastern side of St Martins Way that would also diminish the Guildhall – a recognised landmark building. The visual impact from the east is apparent in the view across the area from the Cathedral roof on the home page of the project website.
- 6.2.4 Because of its size and bulk the existing hotel is recognised as damaging the skyline of the city when seen from afar (eg from Sealand Road or the Grosvenor Bridge). The set-back of its upper storeys from the street frontage does nothing to mitigate this. The new buildings would be just as prominent and would likewise impede views across the western side of the city, providing no contextual roofscape for the Town Hall and diminishing its spire. They would exacerbate the damage done to the skyline by other recent tall, flat-roofed buildings (former Northgate Travelodge and Delamere Street health centre).
- 6.2.5 One may contrast the student accommodation to be erected on the opposite side of St Martins Way, on the Linenhall Stables site (13/03210/FUL). Whatever faults this 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 bays with brickwork in alternating colours and metal-clad attic storeys that rise from a different level on each bay to create variety..
- 6.2.6 We therefore strongly urge that the buildings on the Northgate site fronting onto St Martins Way adopt a maximum height of c 38m AOD, with those further to the east being allowed to rise to c 45m (approximate eaves level of the Town Hall), reflecting the domed topography of the area.
- 6.2.7 The height of the frontage of the hotel could be reduced by removing the bus drop-off point from beneath it. This would open up the possibility of creating an active street-level frontage, as on the corner ‘tower’ of the proposed adjacent student accommodation on Hunter Street ([15/0414/FUL](#)). The improvement in the appearance of the building could be considerable, while bus stops under buildings are generally unattractive and can be intimidating. Bus stops adjacent to the Northgate development could instead be provided by lay-bys on either side of St

Martins Way, with pedestrian crossings located appropriately. However, we judge that in time there could be public demand for bus access to the top end of the development, ie near the new market, and stops should be planned in that area.

- 6.2.8 If a department store of the size currently suggested is to be incorporated in the scheme, then we suggest that it would be more comfortably accommodated in a block defined by Princess Street, Trinity Street and a reinstated Crook Street, where its façade should still be prominent enough for commercial purposes, opposite the market and hotel. With a range of buildings between it and St Martins Way its height and bulk would not be so obtrusive. Even so, its height should be minimised and a flat roof avoided.
- 6.2.9 The present hotel site over the service bay might be better used for housing and could include dedicated parking for residents; this is already proposed at the south end of that area and would result in buildings of a more appropriate scale. Nicholas Street/St Martin's Way were historically residential and are becoming increasingly so again. Whatever buildings are constructed on the site, we urge that those towards the south end of the service bay, towards the Guildhall, should be set back to afford views of that building from the St Martins Gate. The Guildhall (formerly Holy Trinity) lies on the site of the west gate of the Roman fortress, while St Martins Gate is adjacent to the north-west corner of the fortress. The intervisibility of many of Chester's historical landmarks is an important element in the intelligibility and appreciation of its heritage and should be enhanced (see [Towards a Heritage Strategy for Chester](#), 4.1.1).
- 6.2.10 We also have views about the display of the Roman strongroom but reserve those until detailed planning permission is sought; provisionally see our [Comments on Northgate Summary Masterplan Report 2015](#), 8.8.1.

### 6.3 *Relevant Policies/Advice*

- 6.3.1 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.

- 6.3.2 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.

- 6.3.3 [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).



6.3.4 [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.

Key Inward View 18: Roodee, City Walls & skyline from footbridge & railway viaduct, is particularly relevant.

6.3.5 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

6.3.6 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.

6.3.6 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.

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*For Chester Archaeological Society*

31 March 2016