

CHESTER ARCHAEOLOGICAL SOCIETY

COMMENTS ON CWaC LOCAL PLAN PART 2

1.0 CH 1 – Chester Settlement Area

1.0 We broadly welcome this approach.

1.1 *Re:* ‘Historic routes and grain in the city centre should be protected and reinstatement achieved where possible’. Reword as: ‘Historic routes and grain in the city centre should be protected. Reinstatement should be achieved where possible’ to avoid doubt as to what the ‘where possible’ refers to.

1.2 *Re:* ‘Development along the Inner Ring Road must provide strong and active frontages, appropriate in scale and height to the wider townscape’. This is an important principle that we strongly support; it is particularly relevant to the western sector of the road, within the City Walls, where the height of new buildings proposed as part of the Northgate development, which would damage the skyline of the city, is justified by reference to the width of the road rather than to the height of surrounding buildings. In fact it is the width of the road that is out of scale with the wider townscape. Ways need to be found to reduce its apparent width and divisive impact and to integrate it into the rest of the city.

2.0 CH 3 – Chester Regeneration Areas

2.1 *Re:* 3) Chester Castle Area. It is important that public access to this important historic monument is protected and enhanced.

3.0 CH 6 – Chester Conservation Areas

3.1 We broadly welcome this approach.

3.2 *Re:* ‘it can be demonstrated that they have been sensitively designed, having regard to their location and the immediate character of the area, and including consideration of building height’. The underlined words are weak and/or ambiguous. We suggest: ‘it can be demonstrated that they have been sensitively designed to have regard to their location and the character of the surrounding area, including the height of existing buildings’

3.3 *Re:* ‘they will not result in the loss of any historic routes’. This should be strengthened to refer to maintenance of their widths and alignments, as currently protected under CDLP ENV 5. Some minor streets in Chester, although retaining their overall historic courses, were widened and straightened in the 1960s. Small changes in alignment and variations in width are often historically significant and add to the aesthetic appeal of the city.

3.4 *Re:* 2.26 ‘Chester was a Roman Fortress and town of strategic importance and it still retains much of its defences and Roman street pattern’. This statement should be enlarged on and strengthened: ‘Chester was a Roman fortress, Saxon burh and medieval city of strategic importance. It still retains much of its defences and historic street pattern’. For the avoidance of doubt, these historic streets should be listed; they go far beyond the four main streets of the city.

- 3.5 *Re:* 2.29 It may be prudent to add that the combination of a fine street grain and in places sloping topography will make parts of the city unsuitable for developments reliant on large, level floorplates.
- 4.0 CH 7 – Key Views etc**
- 4.1 We broadly welcome this approach.
- 4.2 This policy replaces CDLP ENV 40 as well as ENV 8.
- 4.3 This policy overlooks the factor of topography, which is important in creating Chester's skyline. This concept is embodied in CDLP ENV 8: 'The roofscape is an important factor in defining the skyline of the historic *city due to the topography of the settlement*'. This idea needs to be inserted in the new policy.
- 4.4 CDLP ENV 40 refers to the 'general roofscape which provides the context' for landmark buildings. This concept is missing from the new policy. For 'would not intrude upon strategic views; landmark buildings, historic townscapes and skyline' we suggest 'would not intrude upon strategic views; landmark buildings and their contextual roofscapes, historic townscapes and skyline'.
- 4.5 *Re:* 'have an acceptable impact on the skyline'. 'Acceptable' is a weak expression that encourages the lowest possible standard of compliance. We suggest: 'enhance the skyline'.
- 4.6 For key views the policy refers to the maps in the *Chester and Approaches Characterisation Study*. However, these maps divide the city into small areas, which is not helpful when considering longer-range views; an overall map as in the existing CDLP is needed. It is important that long-range views from the north-west are included, especially from the canal bridge on Parkgate Road, from Saughall Road ('Blacon Meadows') and Sealand Road.
- 4.7 *Re:* 2.39 '... tall buildings that do not make a positive contribution and to their replacement'. It would be helpful if these were listed.
- 4.8 *Re:* 2.39 One might add that long unvarying rooflines (whether flat or monopitches) are inappropriate in Chester.
- 5.0 DM 1 – Development Management**
- 5.1 We broadly welcome this approach.
- 5.2 *Re:* 'It takes full account of the local characteristics of the development site'. These characteristics should explicitly include topography.
- 6.0 DM 40 – Development in Conservation Areas**
- 6.1 We broadly welcome this approach.
- 6.2 *Re:* 'f. Established layout and spatial character. This should explicitly mention retaining the existence, alignments and widths of historic routes.
- 6.3 *Re:* 'a: Demolition of non-listed buildings ...'. Where permission is granted for the demolition of such buildings, they should be appropriately recorded before demolition.

7.0 DM 41 – Listed Buildings

7.1 We broadly welcome this approach.

7.2 In the rare event that permission is granted for the demolition of a listed building or any features of historic interest pertaining to one, then conditions should be attached to ensure no demolition takes place until a scheme for redevelopment has been approved and a contract for the works has been made and to ensure that there is provision for appropriate recording of features that will be lost.

8.0 DM 42 – Non-Listed Buildings etc

8.1 We broadly welcome this approach.

8.2 Add: 'In the rare event that permission for demolition is granted, conditions will be attached to ensure no demolition shall take place until a scheme for redevelopment has been approved and a contract for the works has been made';

Also add: 'Where applications for demolition or alteration of non-designated heritage assets are permitted, the Council will normally make it a condition of consent that applicants arrange suitable programmes of recording of features that would be destroyed in the course of the works for which consent is sought' (cf CDLP ENV 47).

9.0 DM 43 - Registered Landscapes

9.1 We broadly welcome this approach.

9.2 This policy should make reference to *The Cheshire Historic Landscape Characterisation Final Report*, which forms part of the evidence base for the policy.

10.0 DM 44 – Archaeology

10.1 We broadly welcome this approach.

10.2 Re: Para 4 - Where possible detailed agreement on ground impacts should be secured before permission is granted.

10.3 Also add: 'No damage will be permitted to archaeological remains until a scheme for redevelopment has been approved and a contract for the works has been made'.

10.4 Re: para 10.232, add: 'In all cases the policy aims to minimise the damage to archaeological remains caused by development. Well preserved remains of national significance should be preserved *in situ*'.

10.4 Reference should be made of the Cheshire Historic Town Surveys and *The Cheshire Historic Landscape Characterisation Final Report* and *The Cheshire Historic Landscape Characterisation: Managing Historic Landscapes*, together with the Cheshire Environment Record, which form part of the evidence base for the policy.

10.5 The Chester Area of Archaeological Importance and the Primary and Secondary Archaeological Zones, together with areas of archaeological potential in other towns and landscapes of historical/archaeological interest should be indicated on the policy map, as is the case with conservation areas.

11.0 Additional Comments on Preferred Approach and on Policies Map

11.1 *The Need for Credibility*

For these policies to work it is absolutely vital that, while allowing necessary 'real-world' flexibility, they set out crystal-clear parameters for applicants, objectors, officers and members that will allow them to be objectively and consistently implemented. We have to register deep scepticism on this score, given decisions in recent years. For instance, we fail to see how permission for the former Northgate Travelodge and the Delamere Street health centre was consistent with CDLP policy ENV 38: 'Planning permission will not be granted for new development that will obstruct important views within, or views in or out of conservation areas'. Likewise, despite the explicit prohibition in CDLP policy ENV 39, the current Northgate proposals do severe damage to the historic street pattern. The essence of both of these policies is incorporated into the new Local Plan, but is there any reason to think they will be observed?

11.2 *The Need for a Holistic Approach to the Historic Environment*

CWaC should aim for a holistic approach to the historic environment. Policies on conservation and archaeology should therefore be seamless; they should be reviewed together in detail to ensure that they are in harmony and that there are no gaps or duplication. For example, explanation para 10.231 to policy DM 44 (Archaeology) includes buildings in its scope; conversely, modifications to a listed building may well produce (below-ground) archaeological discoveries. The alignments of historic street are treated as a conservation matter, but in advancing understanding they also fall firmly within the sphere of archaeology, and their successive surfacings are clearly an archaeological matter.

11.2 *Maps*

The maps found on the consultation website were too small-scale to be intelligible.

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For Chester Archaeological Society

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