

CWac LOCAL PLAN EVIDENCE BASE CONSULTATION 2024

CHESTER ARCHAEOLOGICAL SOCIETY COMMENTS

1.0 Introduction

- 1.1 The Chester Archaeological Society welcomes the opportunity to comment on these documents. Future development in accordance with a new Local Plan that explicitly aligns with the requirements of the *National Planning Policy Framework* (NPPF), the *National Design Guide* and the *National Model Design Code* could create better places for the borough's residents.
- 1.2 The *Places Background Paper - Introduction* summarises some aims of the NPPF as follows:
- 5.6 *Achieving Sustainable Development* - A social objective – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities' health, social and cultural well-being.
- 5.7 Supporting a prosperous rural economy - Promote the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship.
- 5.8 Promoting Sustainable Transport - The planning system should actively manage patterns of growth.....Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel.
- 1.3 We endorse these aims. Appropriate spatial planning, especially road layout, is essential to the creation of integrated, accessible places, while far greater attention needs to be paid to architectural design to make places attractive, distinctive and desirable to live in. However, even if a new local plan embodying these aims is adopted, it will need to be implemented over several decades to make a difference. Given that recent decisions both by the local authority and government inspectors point in the wrong direction – eg replacement of a pocket park by a MSCP at Chester Northgate, new housing on floodplain off Sealand Road, redevelopment of Winsford town centre as car-centred retail park – this will take a remarkable change of direction and degree of future commitment both at local and national political levels.
- 1.4 The Evidence Base documents need to show how far the existing situation meets the stated aims.
- 1.5 It is not clear how the current documents fit into any overall envisaged suite, so some of the comments below may not be appropriate at this stage; they are also necessarily general and by way of example. They focus in particular on the towns in the *Places Background Paper*, but the same principles apply to the 'Key Service Centres'.

2.0 Data and interpretation

- 2.1 The statistics in the socio-economic profiles of settlements can be presented differently than in summaries: eg draw attention to the number of single-person households in Chester and the number of apartments vs the rest of the borough (34.9% vs 30.2% and 22.6% vs 11.9% respectively). More people also have no car or van and walk to work than in the rest of the borough (24.8% vs 16.7% and 12.1% vs 7.4% respectively). The statistics may be worth re-examining and the significance of differences like these exploring.
- 2.2 Given the emphasis in NPPF on housing, what we need to know is the actual number of houses of different types in each settlement and, if possible, the vacancy rate and unmet demand.
- 2.3 It would be helpful if mapping distinguished a) strategic, through routes, eg M56, M53, A41, A483, A49, A5117, A51, A534, A54, A548, A56, which link towns with one another and the wider world; b) 'arterial routes' within towns linking them to strategic routes or to other parts of the same town (eg Hoole Road and Blacon Avenue in Chester, A 533, A559 and Middlewich Road in Northwich and Sutton Way in Ellesmere Port; c) a range of other 'spine' roads that bind individual areas together (eg Pooltown Road, Ellesmere Port); d) purely residential roads; and e) LWCIP routes.
- 2.4 Detailed information on current public transport frequency and bus stops might have been more appropriate in the *Local Transport Plan*, as these are operational matters. For future spatial planning, it might be more useful for each town and suburb to map the current bus routes and other roads that are possible routes; we also need maps of current/possible routes between towns/suburbs and industrial areas. For local buses we imagine the routes largely corresponding to road types b) and c) above.
- 2.5 The location of retail, community facilities and green space in an area/suburb also needs to be presented on a single map relative to this hierarchy of routes. There needs to be a distinction in the maps between true, large supermarkets where people can buy a wide range of necessities for a week and 'mini-markets' offering a more limited range of goods, sometimes operated by the same companies.
- 2.6 There is no mention of the Greyhound Park/Bumpers Lane retail area in Chester and little of Cheshire Oaks at Ellesmere Port in the *Places Background Paper*, but these are important in the services that they provide and the traffic that they generate. These also need mapped against transport/travel routes.
- 2.7 For each town/suburb, there needs to be a summary spatial and architectural characterisation, supported by photographs.

3.0 The Need for Critical Appraisal

- 3.1 We appreciate that these documents are supposed to be an evidence base, but that should not preclude some critical appraisal of the current situation against the criteria of the *National Planning Policy Framework*, the *National Design Guide* and the *National Model Design Code*, as well as the priorities and aims already set out in the Council's *Local Transport Plan*. This might be done by way of a standardised checklist.

- 3.2 There needs to be a critical appraisal of the centres of towns and especially suburbs in terms of the location and accessibility of services/facilities, their range, architectural quality, and green space. Are they well sited and well linked by foot and bicycle to the communities that they are supposed to serve? Are they adjacent to sustainable public transport routes? Are the buildings visually attractive or minimalist and merely functional (or even just metal sheds)? Do they cohere to produce nodes that give a sense of arrival and distinctiveness/identity and permit linked journeys or are facilities randomly scattered; are they, in fact, 'centres'? Do they need to expand to support growing residential areas? Are green spaces enlivened by trees or are they bare, sterile areas? There is no mention of the new Wrexham Road residential development at Chester, which appears to lack any local services and facilities, and we are somewhat sceptical as to how 'real' LWCIP routes are; dedicated cycle lanes around Chester are often fragmented.
- 3.3 The relationship of roads, and the reliance on travel by private car, to built-up areas is crucial. Do they support them or harm them? In general, the small size of the historic centres of the borough's towns means that they have been disproportionately affected by expansion in recent decades to accommodate wider streets, large surface car parks, a loose urban grain often of poor architectural quality, and consequent pedestrian isolation. This judgement is supported by comments in the *Local Transport Plan*:
- 'Ellesmere Port town centre has been hollowed out by poor 1960s car-centric design ... Poor walking and cycling links from the town centre to surrounding residential areas ... Lack of visibility of Market Hall for pedestrians as a result of the car-dominated environment ... High car mode share for both staff and visitors [at Cheshire Oaks] leading to congestion at peak times requirement for additional parking and traffic management plan' (page 84).
 - 'Poor crossings and heavy car traffic in key areas such as Chester Way isolates pedestrians ... Surface car parking is extensive in the area, creating urban voids and inactive frontages ... The dominance of cars along Venables Road severs the town from the northern part of Witton Street ' (page 86 re Northwich).
 - 'Winsford town centre is dominated by the unattractive, uninviting and inward looking 1970s Winsford Cross Shopping Centre that lacks predictable travel times, gateway arrival and quality car parking ... There are no linkages through the centre and no sense of arrival. A54 acts as a barrier to the Town Centre from the north' (page 87).

As well as the widened, strategic A54 having been driven through the centre of Middlewich, we may note that, absent a Western Relief Road, Nicholas Street and Lower Watergate Street in Chester form part of a major through route from the A483 to the A540 and A41, severing the western part of the walled city from the centre and blighting those streets.

- 3.4 If, in line with NPPF, an objective is to reduce car journeys, the location of supermarkets becomes important: they need to be in the centres of towns or suburbs or on sustainable bus routes. For example, in Chester the Frodsham Street Tesco by the bus exchange and the Parkgate Road Aldi on the bus route to/from Blacon are well sited. Those on and near Sealand Road are actually designed for access by car; their only nearby customer base is in the Garden Quarter, for which they would be better sited on the other side of Sealand Road.

- 3.5 This leads on to an appraisal of the role of out-of-town or edge-of-town retail parks in general, which are explicitly designed to be reached by car (witness their large car parks) and are often of poor architectural quality. Do they satisfy local needs or town-wide ones? It should be noted that the Greyhound Park at Chester could be included in a bus route but, whether by bus or car, it is awkward to access for people on all sides of the city except the west. There is a case for dispersing some of its functions to the suburbs or to underused town-centre sites. Which is the centre of Ellesmere Port: the flourishing Cheshire Oaks or the the run-down area towards the railway station?
- 3.6 The 'Key Settlement Gaps' policy around Northwich is an attractive policy for controlling sprawl and preserving the distinctiveness of settlements. Other parts of the borough could be evaluated against this principle. Sadly, it is too late to apply this principle to the Ellesmere Port–Great Sutton sprawl but it may still be of value in protecting the visual distinctiveness of some of the Chester suburbs and perhaps elsewhere.
- 3.7 There need to be clear statements on the limitations of the rail infrastructure, both in the *Places Background Paper* and in the *Employment Areas Survey*: eg Neston/ Parkgate is connected to Wrexham and Wirral but not to the rest of the borough; Ellesmere Port and its industrial areas are situated on the northern leg of the Chester–Helsby–Hooton triangle with no direct route from Chester; Winsford lies on the West Coast Main Line but has no east–west connections to the rest of the borough.

4.0 Historic and Natural Environment

- 4.1 It is not clear why the historic environment, including conservation areas, and floodplains, are classed as a constraint. Visible ancient monuments add character and a sense of identity to settlements, as potentially the moated site in the middle of the Wrexham Road residential area at Chester; conservation areas add beauty and, often, density, making places attractive and walkable; and floodplains, unless there has been shortsighted development on them, act as 'buffers', protecting downstream settlements from flooding more effectively than engineering solutions, and there is the potential for making them attractive green space. Far from being constraints, the historic built and biocultural environments should be regarded as capital, aiding the development of more characterful and resilient places.

5.0 Design Code

- 5.1 Looking ahead, the value of a borough-wide design code is unclear. If this is to have any degree of detail and give certainty to residents and developers, surely it needs to be specific to individual settlements or even parts of them? A generalised design code for the whole borough would not seem to offer any advance over the national code.

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