DEMOLITION OF EXISTING BUILDINGS AND ERECTION OF HOTEL AT 1–13 FRODSHAM STREET, CHESTER (25/01919/FUL)

CHESTER ARCHAEOLOGICAL SOCIETY COMMENTS

1.0 Introduction

- 1.1 This is a resubmission of the consented application 22/00616/FUL, which will shortly expire. There were two main iterations of the latter, of which it was the second that was approved. Whether by oversight or design, the present resubmission is accompanied by images from both of the 2022 iterations. There is thus a danger that elements of the first iteration could now inadvertently be approved. The resubmission should not be considered until these matters have been clarified.
- 1.2 Given that planning permission has already been granted, we are unclear as to what comments can usefully be made on this resubmission. The Chester Archaeological Society commented on both iterations of the 2022 scheme. The Society stands by these earlier comments, to which links can be found here, and wishes to take this opportunity to reinforce them.

2.0 The Principle of the Development

- 2.1 In 2022 we drew attention to the fact that hotels had taken over from student accommodation as the favoured form of development in Chester and that two approved schemes had not progressed at that time (nor subsequently). This scheme at Frodsham Street now represents a third, one at Black Diamond Street a fourth, and it is more than a year and half since another hotel scheme was approved at Brookdale Place, again without any obvious signs of progress to date. These speculative schemes that are not progressed constitute a form of planning blight, inhibiting more useful development. We also have recent examples of speculative schemes that were built but quickly failed: the Northgate Travelodge, now student accommodation, and Fontessa House on Upper Northgate Street, built as student accommodation but now closed and vacant. In the officer's report on the Brookdale Place scheme, it was conceded that there was no evidence of demand for more hotel accommodation in Chester but stated that CWaC was powerless to reject the application for that reason. It is clear that current planning regulations are not delivering the sorts of developments that Chester needs and should be reformed.
- 2.2 We also drew attention to the fact that the 2022 scheme ignored the recommendations of the *Chester Characterisation Study* for Frodsham Street, especially in terms of height, which, it is clear, had effectively been negotiated away. If CWaC's proposed design code is to serve any useful purpose, then recommendations such as these need to carry much greater weight, and the code needs to encompass not just building design but extend to master-planning and land usage.

3.0 Archaeology

3.1 It seems likely that the basements of previous developments have largely removed archaeological remains. However, the site falls within Chester's *Archaeological Character Zone* 24, the statement for which emphasises the shallow depth at which significant archaeology may be found. In view of this, if the development were to proceed, groundworks for services etc could cause damage and there should be an appropriate programme of mitigation.

- 3.2 Significant results of any necessary archaeological programme should be published to professional standards and be accessible to local interested people. The report should incorporate the results of important earlier excavations on or near the site, especially those of 1966 and 1990/1, which shed light on the Roman parade ground and Roman, early medieval and medieval defensive ditches.
- 3.3 Any opportunity should be taken to enhance the presentation of, and interpret, the medieval 'Drum Tower' and adjoining section of Roman fortress wall to its south.

4.0 Design

4.1 Without compromising our fundamental reservations about the proposed scheme (section 2.0 above), the consented second iteration of the 2022 scheme represented a considerable improvement on the first in terms of more varied facades that make some attempt to respect the character of the street. However, as we pointed out, these improvements make even more incongruous the uniform fifth storey overlooking Frodsham Street, which does not relate to the storeys below in materials, style or articulation. The development would look far better without this storey. If it has to be retained, then it needs to be re-thought so as to better blend in; the fourth storey of 2-4 St Werburgh Street may offer some. Inspiration.

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