

# REVISION OF NATIONAL PLANNING POLICY FRAMEWORK

## CHESTER ARCHAEOLOGICAL SOCIETY COMMENTS

### 1.0 Introduction

1.1 The Chester Archaeological Society concerns itself with the archaeology, history and historical architecture of the pre-1974 county of Cheshire and adjoining areas. It routinely responds to consultations on proposed developments in the city of Chester – their impact on buried archaeology, historical monuments, buildings, conservation areas, green spaces and their settings; it also comments on relevant borough-wide and national policies; all of these responses can be found online on the [Advocacy](#) page of our website. Our comments below encapsulate these earlier responses.

### 2.0 Responses to Questions

#### 5. Meeting the challenge of climate change

##### Question 43

In general we strongly support policy CC2, especially CC2.1.a, 1.b and 1.d.

- a) Historical areas, whether traditional town centres, villages or conservation areas, built before the advent of the motor car, can, through their compactness and mixture of functions, provide a model for development densities and the provision of local services within easy walking distance; these should be capitalised on.

We support the re-use of existing structures with their embedded carbon, especially those pre-dating 1914, which our experience suggests that people are more likely to value because of their more attractive appearance.

Re: policy CC2.1.f, woodland planting should avoid harm to rural archaeological sites as well as to habitats; these may lie at a shallow depth or comprise slight earthworks and are thus at risk from soil disturbance and heavy plant. The same goes for wind turbines and solar panel farms.

Policy CC2 should cross-refer to policy HE1.1.b

#### 14. Achieving well-designed places

##### Question 146

We agree with the approach in policy DP1.

- a) Policy DP1.1.a should cross refer to policy HE1.1.c and HE4.1.c.

We consider that very clear and specific design codes devised with the input of local stakeholders and communities will generally be necessary. Our experience is that current LPA policies and guidance are not unambiguous enough, do not carry sufficient weight and are routinely ignored or overturned.

##### Question 147

We strongly support the approach in policy DP2.

- a) Design guides, design codes and masterplans, agreed with local stakeholders and communities, need to be as specific as possible to make it more difficult for them to be subverted.

Policy DP2.1.a should cross refer to policy HE1.1.c.

**Question 148**

We strongly support policy DP3, especially DP3.1.a, DP3.1.f., DP3.1.h and DP3.2.

- a) Historical buildings, areas, monuments and archaeological sites are often key to character and sense of place and have immense potential to contribute, aesthetically and practically to future developments.

Proposals need to show a clear understanding of the layout, scale, massing, materials and appearance of existing well-designed buildings and areas and show that new developments will be at least as good. This is most likely to be achieved through following locally approved masterplans and design codes.

Policies DP3.1.a DP3.1.f and DP3.1.h should cross-refer to policy HE1.1.c.

**Question 149**

- a) We are sceptical of the value of value of 'pre-application engagement' between developers and planning officers (policy DP4.1) unless it takes place in the context of clear-cut design codes, as in our experience that is where the requirements of current local planning policies are negotiated away. By contrast, the *Chester Archaeological Plan*, although it only relates to buried remains, sets out clear outcomes that are required re preservation and a flow chart showing the procedures that developers should follow in relation to the planning application process and has operated successfully in achieving its aims.

Design review processes should include input from end users and local communities and stakeholders and should focus on whether a proposed development accords with an already-determined, popularly agreed masterplan and design code for a site or area.

Re: policy DP4c, our experience is not so much that developments are downgraded between approval and construction, although we are aware of such cases, but that requirements are negotiated away by LPA planning officers in pre-application discussions with developers; hence our emphasis on the need are very clear design codes.

**15. Promoting sustainable transport`**

**Question 153**

We strongly agree with policy TR4.

- a) Historic town centres and conservation areas built before the advent of motor vehicles are likely to have the qualities outlined in TR4.1.a-c. They should be used as models/inspiration for new developments.

Policy TR4.1 should cross-refer to policy HE 1.1.c

Where existing settlements have been damaged by adaptation for motor traffic (eg by road-widening, demolition of historic buildings to be replaced by large surface car parks and box-like retail warehouses), every opportunity should be sought to repair the damage (eg through using present road space for cycle lanes and trees, encouraging good-quality buildings on car parks).

## 20. Conserving and enhancing the historic environment

### Question 187

We strongly agree with policies HE1-HE3.

- a) Policy HE1.1.b should cross refer to policy CC2.

Policy HE1.1.c should cross-refer to policies DP1.1.a, DP2.1.a, DP3.1.a, f, h and TR4.1.

However, re policy HE3, given the increased emphasis in *NPPF* on forward planning, we consider that HERs should be made statutory and that LPAs should ensure that they are adequately funded and appropriately staffed.

### Question 188

We partly agree with policy HE5.

- a) Policy HE5.5 sits awkwardly. Development proposals for a single site may affect both historic buildings and (by implication buried) archaeological remains, with the two being closely related, and several types of assessment may thus be required.

Policy HE5.5 should be deleted and policy HE 5.1 reworded to read:

Development proposals **potentially** affecting known **or suspected** heritage assets should be accompanied by **assessments** of the significance of the assets affected (including any contribution made by their setting) and of the potential effect of the proposal on their significance. **These assessments may be desk-based, on-site survey or other field evaluation as appropriate.** The level of detail should be proportionate to the assets' importance and no more than is necessary to understand the potential effect of the proposal on their significance. The relevant historic environment record should be consulted as a minimum, and appropriate expertise employed where necessary.

This would also replace policy HE10.1.

A new clause should be added to policy HE 5.2 requiring assessment of how any harm or loss to a heritage asset can be avoided, reduced or mitigated

### Question 189

- a) Of c 370,000 Listed Buildings in England, 92% are Grade II. These buildings thus play a major role in determining the quality of the built environment. Historic England should continue to be notified of works affecting them and should robustly oppose any modifications that cause harm.

The question begged by policy HE6.4 and also policy HE7 is how to evaluate the public benefit that is deemed to justify harm to or loss of heritage assets, designated or non-designated. *NPPF* recognises that heritage assets are an irreplaceable resource, but we have experience of a well-preserved and unique Roman building in Chester, of international significance, that was totally sacrificed to permit a city-centre regeneration scheme that was considered for redevelopment after only thirty years and is now closed only fifty-five years after construction. Assessment of public benefit that supposedly justifies the loss of or harm to heritage assets should consider the likely life span of any new development and take a much longer perspective (eg 150 years).

Policy HE6.4 should be reworded to read:

Where a development proposal would cause substantial harm to, or the total loss of, the significance of a designated heritage asset, consent should be refused unless it can be demonstrated that the development is necessary to achieve **substantial long-term public benefits** that outweigh the harm or loss, or if all of the following apply ....

Policy HE6.4.b should be deleted.

Policy HE7.2 should be reworded to read:

Where a development proposal would cause harm to, or the total loss of, the significance of a non-designated heritage asset, it should only be supported where the harm or loss is outweighed by substantial **long-term** public benefits of the proposal, having regard to the scale of the harm or loss and the significance of the non-designated heritage asset.

### Question 190

We generally support policy HE9. However, it does not go far enough.

- a) The character of conservation areas is at demonstrable risk of gradual erosion as a result of cumulative damage caused by the approval of developments that harm them, even if only slightly. Historic England should retain their current right to be notified of developments in conservation areas over 1000m<sup>2</sup> and should robustly oppose any that do not improve them.

Policy HE9.1.b should be strengthened to read:

**All new developments in a conservation area should make a positive contribution to its special architectural or historic interest (as identified as part of the designation of the conservation area) in their design. Proposals that harm the character of a conservation should be refused.**

We disagree with the separation out of archaeological assets (by implication buried) in policy HE10. It fails to recognise that archaeological remains can be part of a continuum of various types of types of heritage asset which may be found on the same site and may be related. We have suggested in answer to Question 188 that policy HE10.1 could be incorporated in HE 5.1 and 5.2.

The provisions of policy HE 10.2 should be set out under policies HE 6, 7 and 9: all types of heritage asset should be retained unharmed whenever practical; when loss or harm is judged acceptable, it should be recorded by suitably qualified individuals or organisations and the information disseminated.

Recording should be open to public participation whenever possible, and the dissemination should be easily accessible to the public.

### Question 191

In the Glossary, 'Heritage asset' is defined as:

A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest....

The proposed revision to *NPPF* places great emphasis on place-making policies to reduce or mitigate climate change, reduce car usage and build more compact, attractive and distinctive places. We have advocated the potential of the historic

environment to contribute to these policies. Some of this potential lies in streets, squares and the layout of buildings, in addition to their evidential value.

We therefore strongly suggest that the definition of heritage asset be revised to read:

**A building, monument, site, place, or urban or rural landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest....**

**Dr P Carrington FSA**

*Chair, Chester Archaeological Society*

5 March 2026