



LONDON OFFICE

Ms Nicola Pettifer
Horsham District Council
Chart Way
Horsham
RH12 1RL

Direct Dial: 020 7973 36

Our ref: P01559720

23rd May 2023

Dear Ms Pettifer

T&CP (Development Management Procedure) (England) Order 2015 & Planning (Listed Buildings & Conservation Areas) Regulations 1990

LAND TO THE WEST OF ASHINGTON SCHOOL, PARK LANE, ASHINGTON, WEST SUSSEX

Application No. DC/23/0406

Thank you for your letter of 13th May 2023 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

The current scheme is for the development of 180 houses, associated open space, sports pitches, landscaping and related infrastructures on land allocated for 150 dwellings in the made Ashington Neighbourhood Plan.

The south-eastern section of the site falls within an area of archaeological interest associated to an adjacent Scheduled Monument comprising the buried remains of a Roman villa sited north-west of Spring Copse. Any development on this site, including that currently proposed as sports pitch, has the potential to disturb archaeological remains related to this significant archaeological site, which further investigation and interpretation may identify to be of equivalent significance to scheduled monuments.

Although mitigation measures are proposed to reduce any adverse impact, we recommend an alternative use of this land as public open space to ensure protection of the buried heritage and preservation of the physically and conceptually link with the scheduled site.

The proposed upgrading of the existing trackway as access to the development site has the potential to harm the significance of the proximate listed Church of St Peter and St Paul and Church Farmhouse through change of their rural setting. Additional information in the form of detailed drawings and verified views from relevant vantage points should be provided to allow for a proper assessment to be made.



Historic England, 4th Floor, Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA
Telephone 020 7973 3700 Facsimile 020 7973 3001
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Historic England Advice

Significance of Relevant Heritage Assets

The site, which consists of arable farmland and woodland, does not contain any designated or non-designated built heritage and is not located within a Conservation Area.

However, the south-eastern section is immediately adjacent to a Scheduled Monument comprising the buried archaeological remains of a Roman villa sited north-west of Spring Copse (NHLE ref. 1005826).

Geophysical survey carried out to date shows that remains likely to be associated with the Roman villa extend well beyond the scheduled area and into the proposed development site. However, while the principal archaeological features so far identified, which include potential kilns, a bathhouse, and a cemetery, lie outside the development site, those identified within its south-eastern section have not yet been properly interpreted and, therefore, their significance assessed.

The site also contributes to the setting of other proximate heritage assets of medieval origins. These include the Grade II* listed Parish Church of St Peter and St Paul and its graveyard (NHLE ref. 1027442), the Grade II listed Church Farmhouse (NHLE ref. 1353978) and the associated non-designated moated site.

Impact of the Proposal on Relevant Heritage Assets

The current scheme involves development for 180 houses, associated open space, sports pitches, landscaping and related infrastructures. The site has been allocated for residential development of approximately 150 dwellings in the made Ashington Neighbourhood Plan.

While, the proposed masterplan does not propose any built form in the southern, most heritage sensitive section of the site, part of this area would accommodate a single sports pitch and an access road. At pre-application stage, we raised concerns about the potential impact that ground preparation works and provision of ancillary structures, required for the proposed use, could have on surviving below-ground archaeology, as well as on the ability to appreciate the conceptual coherence of the wide archaeological site associated with the Roman villa.

Accordingly, we recommended an alternative use of this land as public open space to ensure protection of the buried heritage, while also preserve the contextual link with the scheduled site.

Notwithstanding this, the current scheme re-proposes use of this section of the site as sports pitch but introduces some mitigation measures to reduce the identified



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adverse heritage impact. In particular, it is proposed to implement surface levelling via introduction of a fill material, thus eliminating the need for ground works. In addition, ancillary structures and floodlighting would be omitted, while sports equipment and landscaping would be kept to a minimum.

In response to our previous advice, it is also proposed to provide interpretation materials in order to increased public awareness and understanding of the Scheduled Monument and its surrounding context, thus enabling the community to discover and celebrate its Roman past.

The new strategy would implicate that physical impacts on potential buried remains would be limited to compaction to create a level surface. However, the proposed distinct treatment and change of character of an area which forms part of a unitary archaeological site, would still cause harm to the significance of the Scheduled Monument by altering our ability to appreciate and understand it.

With reference to potential harm to other heritage assets, it is proposed to access the site via an existing trackway located to the south of the Church of St Peter and St Paul, extending westwards from Church Close, as identified in the allocation site. The trackway would be subject to upgrading and widening to allow two-way traffic and pedestrian footpath. Mitigation measures are proposed in the form of a grass verge between the route and walls of the churchyard to the north, and retention and enhancement of the grass verges and planting along the course of the route.

While this proposal would impact the significance of the listed buildings through change of the rural setting, the degree of the harm caused cannot be properly assessed as detailed drawings and verified views from relevant vantage points have not been provided.

Relevant Policy and Legislation

The Planning (Listed Building and Conservation Areas) Act 1990 places a duty on local authorities to pay special regard to the desirability of preserving listed buildings, including their setting and any features of special architectural interest they possess (Section 66(1)).

Government guidance on how to carry out this duty is found in the National Planning Policy Framework (NPPF). At the heart of the framework is a presumption in favour of sustainable development, where protecting and enhancing the built and historic environment forms part of one of the three overarching interdependent objectives (economic, social and environmental).

Section 16 of the NPPF sets out how the historic environment should be conserved and enhanced and makes it clear in paragraph 195 that conflicts between the



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conservation of the heritage asset and any aspect of the proposal should be avoided or minimised.

The NPPF states that any harm or loss to the significance of a designated heritage asset, from its alteration or destruction, or from development within its setting, should require clear and convincing justification (paragraph 200). It also requires decision makers to determine whether the harm is substantial, or less than substantial. If the harm is deemed to be less than substantial, paragraph 202 of the NPPF requires the harm to be weighed against the public benefits of the proposal.

The scheme should also be assessed in the context of paragraph 206 which requires LPAs to look for opportunities for new development within the setting of heritage assets to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset, or which better reveal its significance, should be treated favourably.

Relevant is also note 68 to paragraph 200 which states that non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments should be considered subject to the policies for designated heritage assets.

Historic England Position

We consider that the proposed sports pitch in the south-eastern section of the site would cause harm to the significance of the Scheduled Monument. Previous investigations have identified evidence of activity within this part of the site to be associated with the occupation of the scheduled Roman villa to the south-west. Accordingly, there is potential for buried archaeological remains to be of equivalent significance to scheduled monuments. Further archaeological investigations would help establish this and, consequently, the level of harm caused by the current scheme.

Although mitigation measures are proposed to reduce potential harm to below-ground archaeology and to the setting of the Scheduled Monument, the change of character entailed by the development of an area which forms part of a unitary archaeological site would still disrupt our understanding and appreciation of the heritage asset as a whole.

On this basis, we reiterate that an alternative use of this land as open space would be the most appropriate approach to ensure protection of the archaeological heritage, while still providing public benefits.

In addition, we consider that a management plan to conserve, manage and interpret the Scheduled Monument and associated area should be provided to guarantee the protection and enhance understanding of the wider Roman villa complex.



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As already stated at pre-application stage, we consider that the possibility of extending the development site's boundary to include the significant archaeology that lies on the field outside the proposed development area would also offer an opportunity to increase delivery of public benefits. It would help remove the threat to buried archaeology from farming activities and would enhance our understanding of this important archaeological area by enabling it to be managed and interpreted as a unified villa site.

We would strongly recommend involvement of the Horsham Museum, the West Sussex County Archaeologist, and the Sussex Archaeological Society in the development of the suggested management plan. They can offer advice on how the document can be tailored to avoid and minimise potential adverse impacts on buried remains, as well as on opportunities for securing wider benefits for their future conservation.

With reference to the potential impact of the proposed upgrading of the existing trackway on the significance of surrounding listed buildings through change of the setting, we recommend provision of further information in the form of detailed drawings and verified views for a proper assessment to be made.

Recommendation

Historic England has concerns regarding the application on heritage grounds.

We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 195 and 206 of the NPPF.

Your authority should take these representations into account and seek amendments, safeguards and further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely
Luciana Gallo

Luciana Gallo, RIBA PhD FSA
Assistant Inspector of Historic Buildings and Areas
London and South East Regions Group
E-mail: Luciana.Gallo@HistoricEngland.org.uk



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