

Historic Environment Response (Archaeology and Built Heritage)

Project name: Land West of Ashington School, Ashington
LPA Ref.: DC/23/0406
Author: Hannah Armstrong BA(Hons) MSc IHBC ACIfA, Associate Heritage Consultant
Date: 17 August 2023

- 1.1. The following provides a combined response to consultee comments received from the Horsham District Council Conservation Officer, Place Services (Archaeology) and Historic England with regard to the consideration of potential impacts on the historic environment resulting from the proposed development at Land West of Ashington School, Ashington.
- 1.2. This response provides additional information, as requested by consultees, alongside clarification as to our assessment of potential impacts to the historic environment (both below-ground archaeology and built heritage assets) and how this should be considered in the Decision-Making process.
- 1.3. Under this revised submission the proposed sports pitch in the southern part of the Site has been removed by the Applicant, with the current intention being that a payment in-lieu will be made to upgrade the existing pitches in Ashington. This approach is still to be confirmed with Horsham District Council.

Horsham District Council Conservation Officer

- 1.4. A response from the Horsham District Council Conservation Officer was received on 15th June 2023.
- 1.5. With the response, the Conservation Officer raises concerns regarding potential impacts on Church of St Peter and Paul (Grade II*), Church Farmhouse (Grade II) and the Scheduled Roman villa, as a result of change in 'setting' arising from the 'suburbanisation' of the Site, and supports the comments raised by Historic England on these matters. However, the comments do not confirm the level of harm which the Officer considers would arise.
- 1.6. We agree that a degree of harm would arise to the Church and Church Farmhouse, with this principally resulting from the changes to the character of the access route, the reduction in the understanding of the assets as being located on the edge of the settlement, and the development of historic land holdings which retain a degree of intervisibility with the relevant asset (Church Farmhouse).
- 1.7. It is, however, clear that the scheme has sought to limit potential impacts on the Listed Buildings, in particular with regard to the treatment of the access route and the siting of residential development, i.e., such areas are located adjacent to existing areas of modern expansion. Accordingly, it is our opinion that the harm identified should be considered as less than substantial, at the lower end of the spectrum for the Church and at the lowermost end of the spectrum for Church Farmhouse.

- 1.8. We also agree that a degree of harm will arise to the overall heritage significance of the Scheduled villa, via a change in 'setting'. With regard to the scheme as originally submitted, the level of harm arising is considered to be less than substantial, at the low end of the spectrum when taking into account the informed nature of the scheme and the important aspects of the 'setting' which contribute to its overall heritage significance.
- 1.9. Should the revised approach proposed under this submission be deemed acceptable, and the sports pitch in the southern part of the Site be removed, the level of harm arising would be reduced as a result of the removal change closest to the Scheduled villa.
- 1.10. The less than substantial harm identified above requires consideration under Paragraph 202 of the NPPF. Whilst recognising the 'great weight' to be given to the conservation of heritage assets, and the statutory duty set out in Section 66(1) of the 1990 Act with regard to Listed Buildings, this does not mean that the identified of harm necessarily requires Planning Permission to be refused. This has been clarified in the Court of Appeal.¹
- 1.11. With specific regard to the Church and Church Farmhouse, a judgement in the Court of Appeal ('Mordue') has clarified that, with regards to the setting of Listed Buildings, where the principles of the NPPF are applied (in particular paragraph 134 of the 2012 draft of the NPPF, the requirements of which are now given in paragraph 202 of the revised NPPF) this is in keeping with the requirements of the 1990 Act.²
- 1.12. The Conservation Officer also identifies that the 'suburbanisation' of the Site would result in harm to the village of Ashington as a whole. It is important to take into account that the village is not a Conservation Area, nor does the Officer identify the village as a non-designated heritage asset. This is an important matter when considering how these comments should be considered in the Decision-Making process.
- 1.13. In terms of the specific design commentary provided by the Conservation Officer and the request for modifications to the scheme:
 - Whilst the Conservation Officer may be of the opinion that a 'more organic and lower density layout would better reinforce the transition between the village centre and the open countryside', as the village is not a heritage asset then this needs to be considered within the context of the identified heritage assets not the village. i.e., how does the interaction between the village centre and the open countryside alter the understanding of the Church, Church Farmhouse or Scheduled villa. As detailed above, we considered that a degree of harm would arise the reduction in the understanding of the Listed Building as being located on the edge of the settlement, but we do not consider that this is applicable to the Scheduled villa when taking into the manner to which its 'setting' contributes to its significance.
 - With regard to the 3-storey development, this is clearly set away from the core of the village and the edge of the proposed development. Furthermore, proposed residential areas are located adjacent to existing areas of modern expansion, i.e., the Ashington CoE School site and Willard Way.

¹ Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

² Jones v Mordue [2015] EWCA Civ 1243.

- From a design perspective, the proposed dwellings are varied in their appearance and respond positively to local vernacular.

Place Services – Archaeology

- 1.14. The first response from the Archaeological Consultant at Place Services advising the Local Authority, was received on 27th March 2023. Within the response, whilst identifying the archaeological potential of the Site, there was no requirement for further predetermination works. A condition for a programme of archaeological works was requested, and I can confirm that the Applicant is amenable to this request.
- 1.15. A further response was received from the Archaeological Consultant on 30th June 2023. The content of the second response differed from the first, and set out that:

The application will need to provide further information on the impacts on the Archaeological Notification Area, and the setting of the Scheduled Monument, this should include detailed information comprising any proposed landscaping/cut and fill in that area and visualisations of the final scheme in relation to the Scheduled Monument. This would help inform the development of a mitigation strategy to in [sic] association with ourselves and Historic England.

- 1.16. The following provides commentary on the additional information required.

Ground Works Associated with the Proposed Sports Pitch

- 1.17. Should the revised approach proposed under this submission be deemed acceptable, then no ground works would be required in the southern part of the Site. Accordingly, the less than substantial harm, at the low end of the spectrum, identified in the Heritage Statement in relation to the proposed ground works – as detailed further below – would no longer arise.
- 1.18. If, however, the sports pitch was to be retained as part of the proposals, this would be located within the bounds of the Archaeological Notification Area (ANA) and represents the aspect of the Site / scheme closest to the Scheduled Monument. As set out in detail within the Heritage Statement, relevant extracts of which are appended to this response, the required works have been carefully designed in order to respond to the known archaeological remains within this part of the Site.
- 1.19. A 'no dig' approach would be taken across the area, with required levelling to be carried out via the introduction of 'fill' material. The level of fill required would not be equal across the area and would be tailored in response to the topography. Works beyond the establishment of the sports pitch proper would be limited to the introduction of a new roadway along the western edge, which would again utilise a no dig approach and does not extend across features identified on the 2019 geophysical survey.
- 1.20. There would be no ancillary structures located within the area, and sports paraphernalia would be kept to a minimum. In particular, the area would not be floodlit. This again removes the need for below ground works and would also reduce the 'character' change that would occur. There would be no additional landscaping in this area, and the existing vegetation boundary retained.

- 1.21. As a 'no dig' approach is proposed, it is considered disproportionate for any archaeological monitoring of the ground works in this location to be required, not least because there will be no 'excavation' to monitor. Nevertheless, it is recognised that there may be some merit in targeting specific anomalies identified within the location of the proposed sports pitches as part of the 2019 geophysical survey in order to gain greater clarity of the potential remains.
- 1.22. We do, not, however, consider the acceptability of the proposals should be predicated on the results of these surveys when taking into account the informed nature of the scheme and that the assessment of impact that we have presented within the Heritage Statement considers a 'worst case scenario' that the remains are '*demonstrably of equivalent significance*' as the Scheduled Monument.
- 1.23. It is our opinion that any physical impacts arising to the features (via compaction only) should be classified as less than substantial harm, at the low end of the spectrum, to the overall heritage significance of the grouping of the Scheduled area and associated outlying areas, when considered as a whole. As detailed above, the less than substantial harm identified should be considered within the context of Paragraph 202.

Ground Works Associated With the Proposed Residential Development in the Archaeological Notification Area

- 1.24. It is understood that the only element of the proposed residential development which the Archaeological Consultant has specific concerns regarding is that within the ANA which lies to the south of the access route from Church Lane.
- 1.25. To confirm, the ANA is not a designated heritage asset nor does its potential interest derive solely from the presence of the Roman villa and associated activity, with the associated title reading as follows: '*Roman Settlement Activity, a Medieval Moated Site, Church Farm Historic Farmstead and the Medieval Hamlet of Ashington*'. Current evidence (including the type and trajectory of features identified on the 2019 geophysical survey) has not identified any evidence that that wider activity associated with the Roman villa extends into area to the north of the sports pitches.
- 1.26. Ground works associated with the residential area and the construction of the access route and southern element of the spine road within this part of the ANA are anticipated to be as follows:
- The current predicted maximum depth of adoptable road construction will be 690mm based upon the anticipated ground conditions. This has the potential to increase to 940mm should ground conditions in this area be found to be of poorer quality than expected, although this is the worst case in terms of formation depths.
 - Foundations and drainage for the proposed dwellings will be at a deeper depth and will vary dependant on ground levels and conditions. Foundations will utilise both shallow trench footings (1.2–1.5m below existing ground levels) and piles. Indicative drainage depths are shown on the attached drainage strategy and would typically be 1.2m max depth.
 - Works associated with the proposed access track comprise the removal of an existing concrete track, and the replacement of this poor-quality hard surface with a mix of block paving, 'black top' tarmac and 40mm AC10 close graded surface (Asphalt), as detailed on DWG No. 3033-APA-ZZ-OO-LA-L-1001. The width of the route as proposed will be marginally wider than the existing. The majority of the route

will utilise the latter in order to provide a 'no dig' methodology in response to root protection areas, with ground works associated with the remainder of the surfaces considered to be minimal, in particular when taking into account the exiting concrete route.

- 1.27. Based upon the current understanding we do not consider that the undertaking of the groundworks set out above, within an isolated part of the ANA should preclude development.

Impacts on the Scheduled Monument, via a Change in 'Setting'

- 1.28. As detailed within the attached, we consider that the proposed development, as originally submitted, would result in a degree of harm to the overall heritage significance of the Scheduled villa, via a change in 'setting'. This is considered to be less than substantial, at the low end of the spectrum. The assessment which supports these conclusions is detailed within the Heritage Statement, a key aspect of the assessment within which was that the key focus of interest of the villa was to the south, i.e., away from the Site, as indicated by its siting in relation to local topography. Specifically, although visible:

- The scheme has been carefully designed in response to the Scheduled villa, in particular with regard to the design of the southern sports pitches. There will be no ancillary structures located within the area of the proposed sports pitches, and sports paraphernalia and landscaping would be kept to a minimum. In particular, the area would not be floodlit.
- Due to the position of the residential development (c.140m from the Monument), and with the intervening open space provided by the proposed sports pitches, there will be a clear physical and visual separation between the residential development and the Scheduled villa
- The development as a whole will read as part of the existing extent of Ashington to the north, in particular with regard to the school site and modern development on Willard Way.
- The ability to view the proposed sport pitches and residential development from the Scheduled villa, or for it to be viewed in-conjunction with the asset from areas to the east and west, will not alter the understanding of the siting of the building in relation to the Roman road to the south, nor the relationship with contemporary archaeology remains.
- The Scheduled villa will still be understood as an isolated feature. Furthermore, based upon the topography is considered that any views which the villa was sited in order to take advantage of would be across the valley areas to the south. These would be unaffected by the proposed development.

- 1.29. Should the revised approach proposed under this submission be deemed acceptable, and the sports pitch removed, the level of harm arising would be reduced as a result of the removal change closest to the Scheduled villa.

- 1.30. In order to further aid in the Decision-Making process, and in direct response to commentary raised by the Archaeological Consultant and Historic England (see further below), a site section of the proposed development from the Scheduled Monument has been prepared and forms part of the package of information which this response

accompanies. A visualisation is also being prepared in response to the commentary raised and will be submitted in due course. It is, however, highlighted that this will depict the inclusion of the sports pitch, and thus will represent the worst-case scenario.

Historic England

- 1.31. A response was received from Luciana Gallo, Assistant Inspector of Historic Buildings and Area, on 23rd May 2023.
- 1.32. Firstly, it is highlighted that whilst the response states that Historic England have 'concerns' regarding the scheme, the response does not state that Historic England formally object to the application. Furthermore, whilst identifying harm to the Scheduled Monument, and nearby Listed Buildings (see further below), the response does not provide any clarity on the level of harm that Historic England consider to arise in order to aid the Decision-Maker in their role.
- 1.33. With regard to the Scheduled villa, the response states that the proposed development as originally proposed, even when taking into account the proposed mitigation measures, would cause harm to the significance of the asset as a result of physical impacts to associated archaeological remains within its environment and a change in 'setting'. It is the view of Historic England that the proposals would disrupt the *'understanding and appreciation of the heritage asset as a whole.'* Historic England also identifies that the identified archaeological activity within the southern part of the Site has to the potential to be *'demonstrably of equivalent significance'* as the Scheduled Monument.
- 1.34. Firstly, as detailed above and in the attached, we do not disagree with Historic England that harm would arise to the Scheduled Monument as a result of physical changes to associated archaeological remains and a change in 'setting' as proposed under the original submission. It is our opinion that the combined harm would be at the lower end of the less than substantial harm spectrum. It is also highlighted that our assessment has assumed the 'worst case scenario' that the archaeological activity is of *'demonstrably of equivalent significance'* as the Scheduled Monument.
- 1.35. As detailed above, the revised approach proposed under this would remove physical changes to associated archaeological remains and results in further separation between the Scheduled villa and the new development. Accordingly, the nature of impact resulting from the revised approach, if deemed acceptable, would be different and the level of harm arising would be reduced.
- 1.36. On the basis of identifying harm to the Scheduled Monument, Historic England confirm that it is their position (as previously set out within their Pre-Application response) that the southern part of the Site should be utilised as open space *'to ensure protection of the archaeological heritage, while still providing public benefits.'*
- 1.37. The response also states that Historic England *'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.'*

- 1.38. In response to these comments, the following points are made:
- The allocation of the southern area as public open space or sports pitches under Policy ASH11 of the Ashington Neighbourhood Plan 2019–2031. cannot be ignored. The archaeological potential of the Site was recognised as part of the development and adoptions of the Neighbourhood Plan.
 - The revised approach would result in the southern area being retained as open space, and thus in turn would respond to the commentary made by Historic England on this matter. It is, however, considered disproportionate, and beyond the obligations and considerations of this application for the Applicant to be required to purchase more land.
- 1.39. Historic England also 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'* should be provided as part of the application.
- 1.40. Again, we consider that the request for a Management Plan for the Scheduled Monument is disproportionate, and beyond the obligations and considerations of this application, in particular as the Scheduled Monument falls beyond the redline area and beyond the control of the applicant, rendering such a request undeliverable. The Applicant would, however, be happy to provide some form of interpretation on site, as set out within the Heritage Statement.
- 1.41. The response continues by stating that Historic England consider that the proposals would impact upon the significance of Listed Buildings, although only the Church of St Peter and Paul is referred to by name, and specifically with regard to the proposed access route. It is Historic England's view that they cannot properly assess the impact until detailed drawings and verified views are provided regarding the access route.
- 1.42. To confirm, the application submission was accompanied by a layout plan and landscape masterplan. We were content that the information provided within these documents was sufficient for us to be able to undertake our assessment, as set out in the Heritage Statement.
- 1.43. However, in response to the requests from Historic England further information regarding the proposed materials is also provided by DWG No. 3033-APA-ZZ-OO-LA-L-1001 which identifies:
- The far eastern edge of the route, at the junction with Church Close, will utilise 'black top' tarmac as part of the route in this location falls outside of the application boundary and thus this surface treatment will allow for a suitable transition of materials.
 - Rumbled block paving is proposed the route which it runs adjacent to the Church of St Peter and Paul, the colour of which will be specifically chosen to compliment the Church and the churchyard boundary wall.
 - The adjacent pedestrian footpath to utilise 'black top' tarmac, with this surface treatment tying in with the existing pathways on Church Close and other existing footways which the new footpath will connect to.

- The central and western parts of the route will utilise 40mm AC10 close graded surface (Asphalt) in order to provide a 'no dig' method of the resurfacing and improvement of the route in the vicinity of root protection areas.

- 1.44. A visualisation of the route is also be prepared in response to the commentary raised and will be submitted in due course.
- 1.45. As detailed within the Heritage Statement, we are of the opinion the harm arising to the to the Church of St Peter and St Paul as a result of the development as a whole, would be at the lower end of less than substantial harm. This should be considered with the context of Paragraph 202 of the NPPF, as detailed above.
- 1.46. Although resulting in the widening of the existing trackway, the design treatment in general will limit the overall character change that will occur, and the manner to which this would impact upon the overall experience and appreciation of the Church. Specifically, the proposed landscaping and planting would limit the impact on the understanding of the historic 'rural' character of the surrounds of the asset, in particular when viewed from Church Lane.

Summary

- 1.47. In summary, we considered that the only heritage assets that are sensitive to the development of the Site comprise:
- Grade I Listed Church of St Peter and Paul.
 - Grade II Listed Church Farmhouse.
 - Scheduled Roman Villa c.180 northwest of Spring Copse
- 1.48. It is our opinion that the harm arising to the Church of St Peter and Paul and Church Farmhouse, via a change in 'setting', should be considered as less than substantial, at the lower end of the spectrum for the Church and at the lowermost end of the spectrum for Church Farmhouse.
- 1.49. As original submitted the proposed development included the establishment of a sports pitch in the southern part of the Site. It is our opinion that the harm which would arise to the Scheduled villa as a result of physical changes to associated archaeological remains and a change in 'setting', as proposed under the original submission, would be at the lower end of the less than substantial harm spectrum. This assessment has assumed the 'worst case scenario' that the archaeological activity is of '*demonstrably of equivalent significance*' as the Scheduled Monument.
- 1.50. Under this revised submission the proposed sports pitch in the southern part of the Site has been removed by the Applicant, with the current intention being that a payment in-lieu will be made to upgrade the existing pitches in Ashington. This approach is still to be confirmed with Horsham District Council.
- 1.51. Should the revised approach proposed under this submission be deemed acceptable, the level of harm arising would be reduced as a result of the removal of physical changes to associated archaeological remains and change closest to the Scheduled villa.

- 1.52. The less than substantial harm identified above requires consideration under Paragraph 202 of the NPPF. Whilst recognising the 'great weight' to be given to the conservation of heritage assets, and the statutory duty set out in Section 66(1) of the 1990 Act with regard to Listed Buildings, this does not mean that the identified of harm necessarily requires Planning Permission to be refused. This has been clarified in the Court of Appeal.³

³ Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

Assessment of Impact

- 6.35. In accordance with Policy ASH11 of the Ashington Neighbourhood Plan 2019–2031 (see **Section 5**) the southern part of the Site will be 'developed' as sports pitches.
- 6.36. The physical impacts required as part of the establishment of the sports pitches has been carefully considered in response to the probable archaeological remains, to reduce potential impacts. Specifically:
- The sports pitch proper has been orientated so as to minimise extension over the features identified on the 2019 geophysical survey.
 - Utilising a 'no dig' approach across the area, with the requiring levelling to be done via the introduction of a 'fill' material and which would create a flat surface. The level of fill required is not equal across the area.
 - Works beyond the establishment of the sports pitch proper would be limited to the introduction of a new roadway along the western edge, which would again utilise a no dig approach and does not extend across features identified on the 2019 geophysical survey.
 - There will be no ancillary structures located within the area, and sports paraphernalia and landscaping would be kept to a minimum. In particular, the area would not be floodlit. This again removes the need for below ground works, and will also reduce the 'character' change that would occur. The latter is relevant for the consideration of potential impacts on the significance of the Scheduled Monument, via

a change in setting, with this discussed further in **Section 7**.

- 6.37. It is acknowledged that modest impacts to the below ground archaeological remains within the southern area still have the potential to arise as a result of the compaction of the fill to create the level surface.
- 6.38. Even if one is to take the worst-case scenario that the remains within the southern area of '*demonstrably of equivalent significance*' as the Scheduled Monument, it is clear that not areas (within and beyond the designation) would be of equal significance. This is particularly the case when considering the differences between the presumed ephemeral nature of the outlying features within the Site and the remains of the built form of the villa as covered by the designation.
- 6.39. When taking the above into account, alongside the considered design approach and lack of intrusive works, it is considered that any physical impacts arising to the features (via compaction only) could only be classified as less than substantial harm, at the low end of the spectrum, to the overall heritage significance of the grouping of the Scheduled area and associated outlying areas if considered to be of schedulable significance.
- 6.40. Under Paragraph 202, the less than substantial harm identified should be considered against the public benefits of the scheme as a whole.
- 6.41. It is highlighted that even if the remains within the southern area of '*demonstrably of equivalent significance*' as the Scheduled Monument, Scheduled Monument Consent would not be required as such

classification in the terms of the NPPF does not introduce the same Legislative duties.

- 6.42. If testing suggests that the below ground features within the Site are not of '*demonstrably of equivalent significance*' as the Scheduled Monument, the impact arising to the features should be classified as a low impact to non-designated archaeological features.
- 6.43. With regard to non-designated heritage assets, potential harm should be considered within the context of Paragraph 203 of the *NPPF*.¹³ There is no basis in policy for describing harm to them as substantial or less than substantial, rather the *NPPF* requires that the scale of any harm or loss is articulated whilst having regard to the significance of the asset of local importance.
- 6.44. With regard to the remainder of the Site, there is no evidence to suggest that the archaeological potential should be viewed as a constraint to development, or a matter to be weighed in the decision-making process.

Designated Heritage Assets

- 6.45. There are no designated heritage assets located within the bounds the Site, and thus no physical impacts will occur to such assets. See earlier discussion regarding the differentiation between the classification of archaeological features as being of being '*demonstrably of equivalent significance*' to a Scheduled Monument in the terms of the NPPF, and the Legislative context.
- 6.46. Designated heritage assets in the vicinity of the Site and the manner to which they may be sensitive to development proposals via a change in 'setting' is discussed within **Section 7**.

¹³ DLUHC, *NPPF*, para.203.

**Scheduled Roman Villa Scheduled Roman building
200yds (180m) NW of Spring Copse.**

7.17. As discussed in **Section 6**, the Scheduled site of a Roman building lies immediately to the southeast of the Site. This is presumed to represent a Roman villa.

7.18. The List Entry provides the following description of the asset:

"The monument includes a Roman building surviving as below-ground archaeological remains. It is situated on gently sloping ground above a stream, north-west of Spring Copse near Ashington. The building dates from the second century AD and is associated with a number of ditches. In 1947, partial excavation identified the north-east corner of the foundations of a substantial flint and mortar building about 0.5m below ground level. Within the walls Roman building material and tiles were recovered. Outside the building a small number of Roman coins were found, including one of Constantine, along with Romano-British greyware pottery sherds, dating to the second century AD, and glass fragments. In 1999, geophysical survey confirmed the location of the building, which extends east across a field boundary above Spring Copse, and identified contemporary field ditches surviving as buried features. The extensive area of the building indicates that it is probably a minor Roman villa.

The course of a Roman road, running from Barcombe Mills to Hardham, is situated about 1km south of the site."

7.19. All full copy of the List Entry is included at **Appendix 7**.

7.20. No above ground remains of the monument are clearly legible today.

7.21. It lies in an area covered by scrub, with the wider surrounds comprising agricultural land and woodland, close to the settlement of Ashington.



Plate 9: View south-west across the Scheduled Monument.

7.22. As discussed in **Section 6**, some potentially-associated features are known to have extended north, including into the Site, including those possibly indicative of ditches, pits, and potentially timber structures.

7.23. As described in the Scheduling description, the building (and potentially associated bath house beyond the Scheduled area) were sited on the slope above a stream,

which faces south and south-east, tipping away from the site which lies to the north.

- 7.24. The Scheduling description also notes the location of the Roman road to the south of the monument.

Statement of Significance

- 7.25. Under the heading 'Reasons for Designation' the List Entry states that:

"Despite some partial disturbance from cultivation in the past, the Roman building, 300m south-west of Church Farm House, survives well. It has been shown by partial excavation to contain archaeological information and environmental evidence relating to the Roman building and the landscape in which it was constructed. Geophysical survey indicates that the area has potential for further archaeological investigation."

- 7.26. The heritage significance of the asset is primarily embodied in the archaeological, historic and architectural interest of the physical remains of the monument, and the information which they provide with regard to Roman activity in the locality.

- 7.27. The setting of the asset also contributes to the significance of the asset, although the significance derived from the setting is less than that derived from its physical fabric and below ground archaeological remains.

- 7.28. The principal elements of the physical surrounds and experience of the asset (its "setting") which are considered to contribute to its heritage significance comprise:

- The stream and small valley which the buildings appear to have been sited to make use of and possibly have views over.
- The potential bathhouse or other building located to the north-east of the Scheduled area.
- The archaeological remains of other contemporary and associated buildings and features.
- The Roman road to the south.

- 7.29. The wider surrounds of the asset, which are currently under agricultural use and woodland are considered to make a very small contribution to the significance of the asset through setting, where they contribute to the relative isolation of the building, which appears to have had a relatively isolated situation historically.

- 7.30. The southern part of the Site is considered to make a small contribution to the overall heritage significance of the Scheduled Monument, via setting. This is derived from the area containing potentially associated features and being part of the immediate surrounds of the asset that gives and understanding of its probably isolated position.

Assessment of Impact

- 7.31. As detailed in **Section 6**, the proposed sports pitches in the southern part of the Site have been carefully

designed to reduce potential impacts on the Scheduled Monument, via a change in 'setting'.



Plate 10: Extract from the proposed site layout, with the approximate extent of the Scheduled area outlined in orange.

- 7.32. Although it acknowledged that a change from open agricultural land to a more formal recreation space would still occur, 'development' in this location would be limited to a single sports pitch and an access road. There will be no ancillary structures located within the area, sports paraphernalia and landscaping would be kept to a minimum, and the area would not be floodlit. This reduces the 'character' change that would occur in this location.

- 7.33. The remainder of the proposed development will be visible from the Scheduled Monument and its immediate environs. Due to the siting to residential development, and with the open space provided by the proposed sports pitches, there will be a clear physical and visual separation between the residential development and the asset. Furthermore, the development as a whole will read as part of the existing extent of Ashington to the north, in particular with regard to the school site and modern development on Willard Way.
- 7.34. The ability to view the proposed sport pitches and residential development from the asset, or for it to be viewed in-conjunction with the asset from areas to the east and west, will not alter the understanding of the siting of the building in relation to the Roman road to the south, nor the relationship with contemporary archaeology remains.
- 7.35. It will result in a change to outward northerly views from the asset; however, as set out above the development will be viewed as part of the modern development of Ashington separate from the immediate environs of the asset. The asset will still be understood as an isolated feature. Furthermore, based upon the topography is considered that any views which the villa was sited in order to take advantage of would be across the valley areas to the south.
- 7.36. Overall, it is anticipated that the proposals would result in a degree of harm to the overall heritage significance of the Scheduled Monument, via a change in setting. This is classified as less than substantial, at the low end of the spectrum.

- 7.37. Interpretation of the Scheduled Monument and its immediate environs is proposed as part of the design for the southern part of the Site. It is will also introduce public access closer to the Scheduled Monument. These changes will result in an increased public awareness and understanding of the Scheduled Monument, which can be viewed as a positive change in how the asset is experienced. This should be considered as a heritage benefit under the Paragraph 202 balance.

Parish Church of St Peter and St Paul

- 7.38. Church of St Peter and St Paul was added to the National List, at Grade II*, on 15th March 1955, and comprises a parish church with 15th-century origins and subject to restoration and extension in 1872.



Plate 11: The Church of St Peter and St Paul as seen from the southwest.

- 7.39. Today, the Church lies within a defined churchyard, on the edge of the settlement of Ashington. The current extent of the churchyard is much larger than the historic arrangement, and has been subject to notable arrangement to the north (see Plates 12 and 13).
- 7.40. The current extent of the churchyard is bound by the route of Church Close to the north and east, beyond which modern residential development, a community centre, a school building and playfields. The latter extend along the western sound of the churchyard, with mature vegetation enclosing the area in this location.
- 7.41. The southern extent of the churchyard, marked by a stone wall, is bound by an access track connecting Church Close to Church Farm and a grouping of modern commercial units further to the west. This represents the remains of a trackway visible on historic mapping, providing access to the Church Farm complex. Another track, c.30m in length, runs in parallel, beyond which are a group of modern houses located on Church Lane (Plate 14).
- 7.42. Although the environs of the Church have been subject to notable change during the 20th century (see comparison provided by Plates 12 and 13), and it is now surround by various buildings and their associated demises, it retains a sense of being in a settlement edge location, with undeveloped land to the north-west of the asset co-visible with it in views from the churchyard and Church Close (Plates 15 and 16).