

Heritage Statement

Land West of Ashington School, Ashington

On behalf of Bellway Homes Ltd.

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1. Introduction

- 1.1. Pegasus Group have been commissioned by Bellway Homes Ltd. to prepare a Heritage Statement to consider the proposed residential development at 'Land to west of Ashington School, Ashington', as shown on the Site Location Plan provided at Plate 1.



Plate 1: Site Location Plan

- 1.2. There are no designated or non-designated built heritage assets located within the bounds of the Site, nor is the Site located within a Conservation Area. There are, however, three designated heritage assets within the

environs of the Site, namely: the Scheduled Roman building 200yds (180m) NW of Spring Copse; the Grade II* Listed Church of St Peter and St Paul; and the Grade II Listed Church Farm.

- 1.3. The southern part of the Site is also thought to contain below ground archaeological remains which have the potential to be associated with the occupation of the Roman villa.
- 1.4. Planning Permission is sought for the development of 180 residential dwellings alongside areas of open space, sports pitches, allotments and associated infrastructure.
- 1.5. The Site is allocated for development under Policy ASH11 Ashington Neighbourhood Plan (2021). The wording of the allocation, in particular with regard to the historic environment, is discussed further in **Section 5**.
- 1.6. This Assessment provides information with regards to the significance of the historic environment to fulfil the requirement given in paragraph 194 of the Government's *National Planning Policy Framework* (the *NPPF*) which requires:

"...an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting".¹

¹ Department for Levelling Up, Housing and Communities (DLUHC), *National Planning Policy Framework (NPPF)* (London, July 2021), para. 194.

1.7. In order to inform an assessment of the acceptability of the scheme in relation to impacts on the historic environment, following paragraphs 199 to 203 of the *NPPF*, any harm to the historic environment resulting from the proposed development is also described, including impacts on significance through changes to setting.

1.8. As required by paragraph 194 of the *NPPF*, the detail and assessment in this Report is considered to be "proportionate to the assets' importance".²

Pre-Application Advice

1.9. Prior to the finalisation of scheme, pre-application advice sought from Horsham District Council and Historic England.

Horsham District Council

1.10. A written Pre-Application response was received from Horsham District Council on 12th April 2022. The discussions presented within the response were informed by onsite discussions between LPA Officers (including the Conservation Officer) and members of the project team.

1.11. With regard to the built historic environment, the following response was provided:

"The Council's Conservation Officer expresses concern regarding the proposed access to the site being situated alongside the Grade II church of St Peters and St Pauls Church. The current access to the

farmyard is relatively informal and low-key suited to its rural location, intensity of use and edge of village location. The current access also respects the nature of the churchyard's tranquil position and despite the existing vegetation and boundary treatment its simplicity enables an understanding that Church Farm House and the Church would have had a historical relationship.

This aspect will form a vital consideration in any eventual development proposal. The Ashington Neighbourhood Plan recognises that the Parish Church of St Peters and St Pauls forms a central point of the village, identified as the 'Heart of the Village', alongside the other community buildings and facilities. Nationally, the setting of designated heritage assets is recognised as a fundamental consideration under para.194 of the NPPF.

The allocation of the site identifies that access to the wider development site must be from Church Close and that the design of this access must protect the setting the listed church (Grade II* listed) and Church Farm House (Grade II listed).

The site visit revealed that this existing farm track that provides access to the farm, farm lands and Church Farm House is single-width and informal in nature, appropriate for a low-use track. As a result of the proposed scale and nature of development, all access is to be routed along this track, including the residential access as well as any traffic associated

² DLUHC, *NPPF*, para. 194.

with the football pitch and AWP, necessitating upgrading works to highway standards and widths to allow two-way passing traffic. Furthermore, traffic associated with the football field and AWP would also be routed along this access road.

At this stage, it is not clear how the existing parameters of the track would allow for the essential upgrading and widening, to allow two-way traffic and pedestrian footpath, as the track is constrained along the northern side by the flint wall to the church yard, and by the vegetated boundary to Church Farm House along the southern side."

- 1.12. In addition to the above, the following discussion was set out within the summary section of the LPA Pre-Application response:

"At this stage, we have concerns at the proposed vehicular access to the site, with this being routed alongside the Grade II listed church of St Peters and St Pauls, and having to accommodate not only the construction traffic, but the resulting residential vehicular movements and trips associated with the sports facilities and allotments. This is in full recognition that the policy requires access in this location which is accepted. Detailed drawings would need to fully illustrate the required widening works so that a two-lane access can be achieved, in addition to a pedestrian footpath and landscaping, and any impact this might have on adjacent parcels of land ownership and heritage setting. Whilst there is concern regarding the access into the site, initial plans submitted as part of the NP revealed an access arrangement could be achieved that provided a good level of separation from and protection of the adjacent*

listed heritage asset. This solution does, however, appear to require the use of, and re-alignment of, boundaries and land to the south of the existing access track. This element, and associated land ownership matters, would need to be fully resolved and demonstrated as part of any prospective application."

- 1.13. The above would indicate that the only Listed Buildings which the LPA considered to be sensitive to the proposed development are the Grade II* Listed Parish Church of St Peter and St Paul and the Grade II Listed Church Farm – we concur with this opinion. Furthermore, the only aspect of the proposed development which the Officers raise concern from a heritage perspective is the proposed access route, with no commentary provided with regard to the wider development.

- 1.14. The manner to which the design of the access route has been developed in order to minimise potential impacts on the built historic environment is discussed in **Section 7**.

- 1.15. With regard to below-ground archaeology, the response set out that:

"Geophysical surveys have been carried out on the land immediately surrounding the site of the former Roman Building, now a designated Scheduled Ancient Monument, which identified buried remains and potential areas of interest. Although these surveys appear to have been concentrated thus far around the known archaeological site, it advised that further archaeological investigations are carried out of the pre-application site. In relation to the currently submitted wider development plan of the site, the area

designated as open space / football pitch contains archaeological remains and so should be accompanied by more details setting out how this land is to be managed without disturbing the remains."

- 1.16. Advice regarding below ground archaeological is provided to Horsham District Council by Place Services. It is our understanding, via liaison with Horsham District Council, that it is not routine for Place Services to provide pre-application advice, outside of an agreed PPA. Accordingly, it has not been possible to undertake pre-application discussions at a local level regarding this matter.

Historic England

- 1.17. Pre-Application advice was received from Historic England in December 2022 and January 2023, and principally pertained to the consideration of the Scheduled Roman villa, and the identified archaeological remains within the southern part of the Site.
- 1.18. Historic England set out within their December 2022 letter that they were of the opinion that the remains within the southern part of the Site *"contribute to the significance of the Roman villa and, therefore, they are of national interest and engaging footnote 63 to NPPF policy 200. This requires non-designated archaeological assets of demonstrably equivalent significance to scheduled monuments to be considered subject to the policies for designated heritage assets."*
- 1.19. As discussed in **Section 6**, for the purpose of this assessment we will have regard to footnote 68 of the NPPF, whilst noting that this represents a 'worst case scenario'.

- 1.20. We would note that even if remains contribute to the significance of the villa through association, this would not necessarily make them of national interest.

- 1.21. In terms of potential impacts on below ground archaeology and the Scheduled Monument, Historic England set out the following within their December 2022 response:

"While, the emerging masterplan does not propose any built form in the southern section of the site, the intended use of part of this area for sport pitches, may require extensive landscaping, drainage works and ground preparation that could potentially impact on surviving below-ground archaeology. We, therefore, recommend that this land is not used for this purpose but instead as public open space which would ensure protection of the buried heritage while still delivering public benefits."

- 1.22. Further clarification was sought from Historic England on the level of impact that they considered had the potential to arise. Their response dated 3rd January 2023 reads as follows:

"We cannot be more specific regarding the potential level of harm to the Scheduled Monument at this time. This requires a much better understanding of the archaeological remains and the proposed design than we currently have. However, as indicated in our letter previously, areas of extensive landscaping, drainage etc. can all be physical impacts which are currently undefined. For example, if the construction of the playing field required substantial levelling then this has a higher potential for harm. Lighting, fencing, changing facilities, vegetation planting... the list goes

on as to what could be harmful and what has not been clearly outlined at this stage. Furthermore, we consider that separate treatments/development to different areas of what is essentially one archaeological site would likely harm our ability to appreciate and understand this heritage asset. This is what leads us to propose that a more 'natural' public open space, one which links this area physically and conceptually with the area that is scheduled, would likely serve to enhance the site more clearly."

- 1.23. As explored further in **Sections 6** and **7**, the works proposed in the southern area have been carefully developed in order to reduce potential impacts on below ground archaeological remains beyond the Scheduled area, and to the Scheduled Villa site via a change in setting.
- 1.24. With regard to the Church of St Peter and St Paul and Church Farmhouse, Historic England stated: "*we recommend giving due consideration to the sympathetic treatment of the access road, as well as to provision of a sensitive landscaped design for the eastern edge of the residential development. This approach would ensure that the setting of the listed buildings is protected and views to and from them are retained, while providing an attractive gateway to the development.*" The manner to which the design of the access route has been developed in order to minimise potential impacts on these assets is discussed in **Section 7**.

2. Proposed Development

- 2.1. Planning Permission is sought for the redevelopment of the Site for residential use. 180no. dwellings of varying sizes are proposed, alongside required infrastructure and landscaping. The nature of development proposed accords with the parameters of Policy ASH11 Ashington Neighbourhood Plan (2021)
- 2.2. As demonstrated by the Proposed Site Plan (an extract of which is provided at Plate 2), built form would be focussed in the central part of the Site, with the north-western and southern extents to be utilised for sports facilities and areas of public open space. The works proposed in the southern area have been carefully developed in order to reduce potential impacts on below ground archaeological remains, and to the Scheduled Villa site via a change in setting – see further in **Sections 6** and **7**.
- 2.3. The development will be accessed via an existing trackway located to the south of the Parish Church of St Peter and St Paul, extending westwards from Church Close. The trackway would be subject to upgrading; however, the proposed designs have been carefully developed in order to suitably respond to the context and minimise impacts of the historic environment – see further discussions in **Section 7**.
- 2.4. **Section 7** of this Report presents an analysis of the impact of the proposed development on relevant built heritage assets discussed.



Plate 2: Proposed Site Layout (Extract from DWG No. 3033-APA-ZZ-00-LA-L-1000 Rev. P00.03).

3. Site Description and Planning History

Site Description

- 3.1. The Site comprises of arable farmland and woodland, totalling approximately 14.74ha, located on the western extent of Ashington, West Sussex. The principal access to the Site is via a trackway south of the Parish Church of St Peter and St Paul.
- 3.2. Both the Site's internal and external boundaries are formed by a mix hedgerows and treeline boundaries. Beyond the Site's boundaries to the south and west is further mixed woodland and agricultural land. To the north of the Site is a mix of residential development, scrubland and a nurseway whilst to the east is a mix of residential development, the Church of St Peter and St Paul and its associated churchyard, a school and a small area of agricultural land.

Site Development

- 3.3. An initial review of historic mapping of the proposed development site indicates that it has been primarily in agricultural use from at least the later post-medieval period and is considered likely to have been in such use for some time. A full analysis of the Site's historic development is considered in **Section 6**.

Planning History

- 3.4. No planning history for the Site was identified within recent planning history records held online by Horsham District Council.

4. Methodology

4.1. The aims of this Report are to assess the significance of the heritage resource within the site/study area, to assess any contribution that the site makes to the heritage significance of the identified heritage assets, and to identify any harm or benefit to them which may result from the implementation of the development proposals, along with the level of any harm caused, if relevant.

4.2. This assessment considers built heritage and archaeology.

Sources

4.3. The following key sources have been consulted as part of this assessment:

- The National Heritage List for England for information on designated heritage assets;
- The West Sussex Historic Environment Record (HER) for information on the recorded heritage resource and previous archaeological works;
- Archival sources, including historic maps, held at the West Sussex Record Office;
- Aerial photographs and documentary sources held at the Historic England Archives, Swindon; and
- Online resources including Ordnance Survey Open Source data; geological data available from the British Geological Survey and Cranfield University's

Soilscapes Viewer; Google Earth satellite imagery; and LiDAR data from the Environment Agency.

4.4. For digital datasets, information was sourced for a 1km study area measured from the boundaries of the Site although this was reduced to 500m study area to provide a level of data considered to be more insightful to the archaeological potential of the Site. Information gathered is discussed within the text where it is of relevance to the potential heritage resource of the site. A gazetteer of recorded sites and findspots is included as **Appendix 1** and maps illustrating the resource and study area are included as **Appendix 2**.

4.5. Historic cartographic sources and aerial photographs were reviewed for the site, and beyond this where professional judgement deemed necessary.

4.6. Heritage assets in the wider area were assessed as deemed appropriate (see **Section 6**).

Site Visit

4.7. A site visit was undertaken by a Heritage Consultant from Pegasus Group in May 2022, during which the Site and its surrounds were assessed.

Photographs

4.8. Photographs included in the body text of this Report are for illustrative purposes only to assist in the discussions of heritage assets, their settings, and views, where relevant. Unless explicitly stated, they are not accurate

visual representations of the site or development proposals, nor do they conform to any standard or guidance i.e., the Landscape Institute Technical Guidance Note 06/19. However, the photographs included are intended to be an honest representation and are taken without the use of a zoom lens or edited, unless stated in the description or caption.

Assessment Methodology

4.9. Full details of the assessment methodology used in the preparation of this Report are provided within **Appendix 3**. However, for clarity, this methodology has been informed by the following:

- ClfA's *Standard and Guidance for Historic Environment Desk-Based Assessment*;³
- *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (hereafter GPA:2);⁴
- *Historic Environment Good Practice Advice in Planning Note 3 (Second Edition) – The Setting of Heritage Assets*, the key guidance of assessing setting (hereafter GPA:3);⁵

- *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (hereafter HEAN:12);⁶ and
- *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment*.⁷

³ Chartered Institute for Archaeologists (ClfA), *Standard and Guidance for Historic Environment Desk-Based Assessment* (revised edition, October 2020).

⁴ Historic England, *Historic Environment Good Practice Advice in Planning: 2 – Managing Significance in Decision-Taking in the Historic Environment* (GPA:2) (2nd edition, Swindon, July 2015).

⁵ Historic England, *Historic Environment Good Practice Advice in Planning Note 3 – The Setting of Heritage Assets* (GPA:3) (2nd edition, Swindon, December 2017).

⁶ Historic England, *Historic England Advice Note 12 – Statements of Heritage Significance: Analysing Significance in Heritage Assets* (HEAN:12) (Swindon, October 2019).

⁷ English Heritage, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008).

5. Policy Framework

Legislation

- 5.1. Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and their settings, and Conservation Areas.⁸
- 5.2. Scheduled Monuments are protected by the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which relates to nationally important archaeological sites.⁹ Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.
- 5.3. In addition to the statutory obligations set out within the aforementioned Act, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.¹⁰
- 5.4. Full details of the relevant legislation are provided in **Appendix 4**.

National Planning Policy Guidance

- 5.5. National Planning Policy guidance relating to the historic environment is provided within Section 16 of the Government's *National Planning Policy Framework (NPPF)*, an updated version of which was published in July 2021. The *NPPF* is also supplemented by the national *Planning Policy Guidance (PPG)* which comprises a full and consolidated review of planning practice guidance documents to be read alongside the *NPPF* and which contains a section related to the Historic Environment.¹¹ The *PPG* also contains the *National Design Guide*.¹²
- 5.6. Full details of the relevant national policy guidance is provided within **Appendix 5**.

The Development Plan

- 5.7. Planning applications within Ashington are currently considered against the policy and guidance set out within the Horsham District Planning Framework (adopted November 2015) and Ashington Neighbourhood Plan 2019–2031 (adopted May 2021).
- 5.8. Policy 34 of the Horsham District Planning Framework pertains to the consideration of 'Cultural and Heritage

⁸ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁹ UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.

¹⁰ UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

¹¹ Department for Levelling Up, Housing and Communities (DLUHC), *Planning Practice Guidance: Historic Environment (PPG)* (revised edition, 23rd July 2019), <https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment>.

¹² Department for Levelling Up, Housing and Communities (DLUHC), *National Design Guide* (London, January 2021).

Assets', and is considered relevant to this application. The wording of this policy is provided in **Appendix 5**.

- 5.9. The Site is allocated for development under Policy ASH11 of the Ashington Neighbourhood Plan 2019–2031. The wording of the policy is as follows:

"Land west of Ashington School (approximately 18.5 hectares as identified on the Policies Map and in Figure 8.2) is allocated for approximately 150 dwellings and development proposals will be supported subject to the following criteria:

Housing and Design:

- i. it provides a mix of dwelling sizes in accordance with relevant policies in the development plan;***
- ii. at least 25% of all units are designed to meet the needs of older people, with an appropriate split of the provision based on the mix of market and affordable properties;***
- iii. affordable housing is provided to meet the requirements of the relevant policies in the development plan;***
- iv. the design of the dwellings reflects the character of the surrounding area.***

Layout:

- v. built development is confined to the central part of the site as shown on Figure 8.2;***
- vi. open space in the west and south of the site is available for public access, accompanied by a suitable management plan to be agreed by the local planning authority.***

Accessibility:

- vii. the provision of appropriate vehicle access into the site from Church Close;***
- viii. the provision of appropriate pedestrian access which provides direct and safe linkages into the Walkway Routes identified in Policy ASH2;***
- ix. where it is within or adjacent to the site, the upgrading of Public Right of Way FP2607 so that it is capable of everyday use all year-round and has suitable lighting for use after dark;***
- x. upgrading of Public Right of Way FP2611 to a high quality shared footpath and cyclepath which links up to Malthouse Lane***
- xi. retention of Forest School activities on the western part of the site, along with safe footpath access, for use by the school, from Ashington Primary School to this area and to the Forest School activity area to the south-west of the site.***

Employment and community infrastructure:

- xii. the provision of commercial floorspace (Use Class B1) on flexible terms, subject to meeting the requirements of Policy ASH9 (Small Scale and 'Move on' Employment Development) – this could be as part of a multi-user community facility at the Ashington Community Cluster;***
- xiii. the provision of a full-sized (11-a-side) grass football pitch for community use;***
- xiv. land and contributions towards the provision of a full-sized (11-a-side), floodlit Multi-Use Games Area primarily for football use;***

xv. land and contributions towards the provision of a sports pavilion, changing rooms and equipment storage facility;

xvi. the provision of allotments on site and the retention of allotment facilities immediately adjacent to Ashington School specifically for school use;

xvii. contributions towards the delivery of other community infrastructure identified in Policy ASH8 (Ashington Community Cluster) where it is not delivered on the site.

xviii. contributions for education as well as the allocation of 0.1 hectares of land adjoining the Ashington Primary School site, closest to the existing school buildings, to enable school expansion to mitigate allocated development;

xix. safeguarding of a further 0.44 hectares of land adjoining the existing school site for further school expansion if required.

Flooding:

xx. provision for flood mitigation works to address flood issues at Mill Lane.

Heritage:

xxi. the setting of the listed buildings, Church Farm House and St Peter and St Paul's Church, is protected;

xxii. in order to protect the setting of the scheduled monument and archaeological remains in the south of the site, no built development occurs in this area;

xxiii. views to and from Church Farm House and St Peter and St Paul's Church are retained.

Other principles:

xxiv. mature trees are retained on the site;

xxv. enhance the setting of the South Downs National Park, including through the provision of an appropriate landscape buffer in line with the requirements of Policy ASH5 (Landscaping and Countryside Access);

xxvi. the submission of a minerals resource assessment to ensure the viable mineral resources are not permanently sterilised by development;

xxvii. occupation of the development is phased to align with the delivery of sewerage infrastructure, in liaison with the service provider;

xxviii. the layout is planned to ensure future access to existing sewerage infrastructure for maintenance and upsizing purposes."

5.10. The 'key principles for development' plan for Policy AS11 is provided at Plate 3.

5.11. The following commentary is also provided within accompanying text:

"Vehicular access to the site will be shared with the land at Church Farm House (Policy ASH12). The design of this vehicular access must protect the setting of the Church and the Church Farm House, both of which are listed properties"

"In addition, this part of the site includes a scheduled monument (Roman building north west of Spring Copse) and Roman remains. Built development is therefore excluded from this part of the site which is

expected to be given over to public open space, accompanied by a suitable management plan."

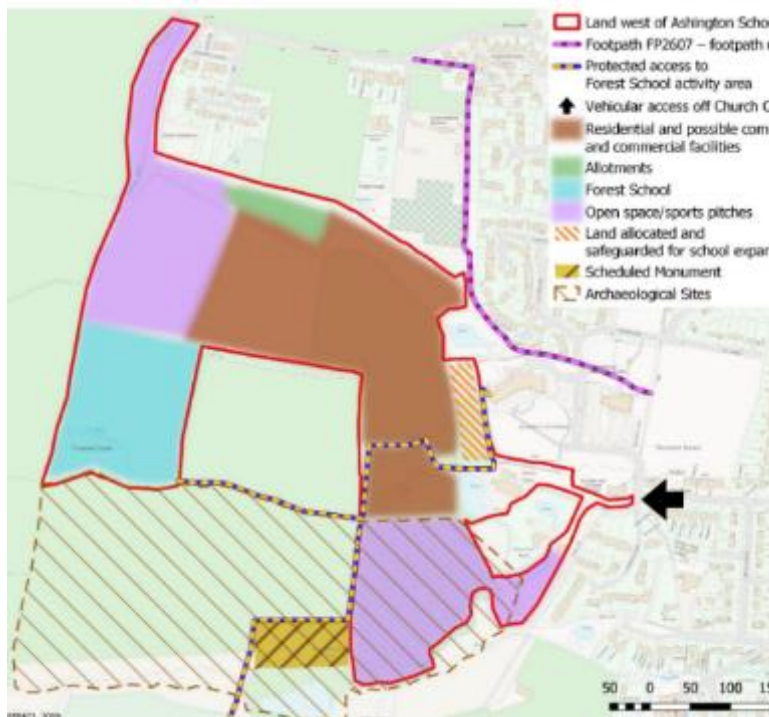


Plate 3: 'Key principles for development' plan for Policy AS11 as included within the Ashington Neighbourhood Plan.

- 5.12. With regard to the southern area, Policy AS11 allocates this for use as open space and sports pitches. It is highlighted that the area allocated for this use is greater than the current site redline, and includes areas closer to the Scheduled Monument and the location of presumed bath house beyond the boundary of the Scheduled Monument (see further discussion in **Section 6**). It also extends closer to the domestic grounds of the Grade II Listed Church Farmhouse.

6. The Historic Environment

- 6.1. This section provides a review of the recorded heritage resource within the Site and its vicinity in order to identify any extant heritage assets within the site and to assess the potential for below-ground archaeological remains.
- 6.2. Designated heritage assets are referenced using their seven-digit NHLE number, HER 'event' numbers have the prefix 'EWS' and HER 'monument' numbers have the prefix 'MWS'.
- 6.3. A gazetteer of relevant heritage data is included as **Appendix 1**. Designated heritage assets and HER records are illustrated on Figures 1, 2, and 3 in **Appendix 2**.

Previous Archaeological Works

- 6.4. The proposed development site has been subject to three no. previous archaeological works recorded within West Sussex Historic Environment Record (HER) datasets. These works comprise:
- A desk-based assessment of the entire site (then identified as Sites 5 and 6 in the draft Ashington Neighbourhood Plan) completed in February 2020 (HER ref. EWS1992);
 - A geophysical survey which extended into approximately 1.38ha of the southern extent of the Site completed in November 2019 (HER ref. EWS1990); and

- A geophysical survey which extended into c.0.45ha of the southern extent of the Site completed in March 1999 (HER ref. EWS1383).

- 6.5. Other archaeological works recoded within the near vicinity of the Site comprise:

- A geophysical survey immediately west of the southernmost extent of the Site in 2017 (HER ref. EWS1924);
- Archaeological excavation approximately 60m south of the Site in 1947 (HER ref. EWS410);
- A geophysical survey which passed within 10m of the proposed development site to the east in 1998 (HER ref. EWS1987); and
- Open area evaluation of land immediately east of the Site completed during 1998 (HER ref. EWS1988).

- 6.6. The results of these works and others within the study area are discussed below, where relevant to the potential archaeological resource of the site.

Topography and Geology

- 6.7. The topography of the site generally reduces in elevation when travelling from south to north. The highest point of the Site, within its southern extent, is at approximately 34m AOD whilst the lowest point, along the Site's northern extent, is at approximately 27m AOD.

6.8. The geology of the Site has been mapped by the British Geological Society. The bedrock geology of the majority of the Site is formed by mudstone of the Weald Clay Formation. A small portion of the southernmost extent of the Site's bedrock geology is instead formed by clay of the Atherfield Clay Formation.

6.9. There is no superficial geology recorded within approximately two-thirds of the proposed development site. The north-eastern extent of the Site is composed of clay, silt, sand and gravel Head.

Archaeological Baseline

Prehistoric (pre-43 AD)

6.10. No prehistoric archaeological remains have been recorded or identified within the proposed development site.

6.11. The nearest instance of recorded prehistoric remains comprises a middle Bronze Age palstave found at Church Farm approximately 30m east of the Site (HER ref. MWS14415). The copper-alloy palstave, which is a form of axe hafted to a split wooden handle with flanges and stop bars to hold the blade in place, was found during the excavation of a drainage ditch at Ashington School in 2008. Despite geophysical survey and evaluation in this area during the 1990s no other evidence of prehistoric occupation was identified.

6.12. The only other instance of prehistoric activity recorded within a 500m proximity of the Site comprises a flint scatter recorded approximately 450m northeast of the Site (HER ref. MWS6354). The flint scatter, which was recorded during a watching brief in 1997, indicated that

the area had been used for flint-working at some point in prehistoric period a precise date could not be identified. Considering evidence of Bronze Age settlement activity recorded during excavations of the route of the Ashington bypass further to the east and northeast, it is considered most likely the flint scatters are Bronze Age in origin.

Romano-British (AD 43 – 410)

6.13. The southwestern extent of the Site is located immediately adjacent to the *Roman building 200yds (180m) NW of Spring Copse*, a Scheduled Monument (NHLE ref. 1005826). Partial excavation of this building in 1947 identified the north-eastern corner of its foundations which were constructed in flint and mortar. Ceramic building material, tiles and glassware were also recovered as well as Roman coinage and greyware pottery sherds dating to the 2nd century AD.

6.14. A geophysical survey of the Scheduled Monument and its immediate environs was undertaken in 1999 / 2000, with this including the far southern part of the Site (HER ref. MWS15027)

6.15. The 1999 geophysical survey confirmed the extent of the building identified in 1947 within the Scheduled Monument, and identified a series of contemporary field ditches in the vicinity of the structure. It was concluded that the building remains represent a minor Roman villa.

6.16. A further geophysical survey of the Monument and environs in 2019 also included the southern part of the Site, and identified several anomalies within the area. These were interpreted as:

- A series of linear cut features, likely to be ditches – marked 5 on Plate 4;
- A number of discrete anomalies, most likely to be pits – marked 7 and 8 on Plate 4; and
- An area of slightly increased magnetic response, interpreted in 1999 as a possible building although it is now considered more likely to represent a more ephemeral feature such as possible timber structures – marked 9 on Plate 4.

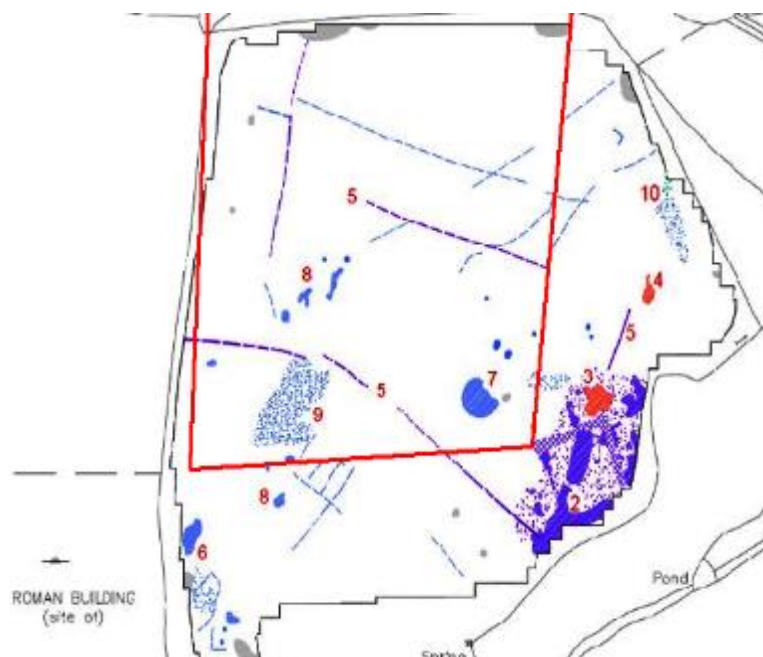


Plate 4: Site boundary (red) overlaying the 2019 geophysical interpretation figure.

- 6.17. Current evidence would suggest that these features, and others identified by the geophysical survey (see below),

are associated with the occupation of the Roman villa to the southwest.

- 6.18. The identified features have yet to be subject of further investigation, and thus their extent, form and survival, and in turn significance, is not currently known. At present there is no definitive evidence to suggest that the features are of '*demonstrably of equivalent significance*' as the Scheduled Monument, when taking into account all relevant factors, including the initial indication of the features through assessment of the geophysical survey and the general importance of the fabric covered by the designation. Nevertheless, we recognise that this is still to be tested, and thus for the purpose of this assessment we will have regard to footnote 68 of the NPPF, whilst noting that this represents a 'worst case scenario'.

- 6.19. Other features identified during these geophysical survey works include a distinct anomaly immediately adjacent to the south-eastern corner of this portion of the Site (marked 2 on Plate 4) indicative of structural remains as well as a spread of strong magnetic anomalies (marked 2 on the above plate) interpreted as an area of fired brick/tile or other burnt deposits. Furthermore, to the north of this anomaly and east of the Site two thermoremanent responses indicative of possible furnaces used to heat the aforementioned building were identified (marked 3 and 4 on Plate 4). These grouping of these responses in the context of adjacent, known Romano-British archaeology (see below) have been interpreted as a possible Roman bath-house associated with the neighbouring Scheduled Monument.

- 6.20. The only other instance of recorded Roman remains within the proximity of the Site comprises finds of unspecified 'Roman Material' found in the vicinity of

Ashington Church c.40m from the Site's proposed access in 1957 (HER ref. MWS4033). Worthing Museum has records of two worn coins 'from the villa site at Church Farm' which broadly correspond with the date and location of the recorded finds although it is not readily apparent if these coins represent the entirety of encountered Roman remains in this location.

Early medieval (410 AD – 1066) and Medieval (1066 – 1539)

- 6.21. No archaeological remains dating to the early medieval or medieval period have been identified within the Site in HER datasets.
- 6.22. The most significant instance of medieval activity close to the proposed development site is the Parish Church of St Peter and St Paul, a Grade II* Listed Building (NHLE ref. 1027442) located c.20m north of Site's proposed access. The building was constructed in the 15th century and was subject to restoration in 1872. It is considered in greater detail within the **Section 7**.
- 6.23. An area immediately east of the Site was identified as a possible medieval field system during geophysical survey and archaeological evaluation in the area in advance of development (HER ref. MWS7038). Features identified comprised a series of parallel, shallow drainage ditches within which a 13th-century cooking pot was recorded. This is considered to represent an area of agricultural land during the early medieval/medieval periods rather than a focus for domestic activity during these periods.
- 6.24. A possible moated site has also been identified within the study area, approximately 90m southeast of the Site (HER ref. MWS4254). The location was identified from

historic mapping (Plate 5) which depicts the possible moated site which is still identifiable on modern satellite imagery.

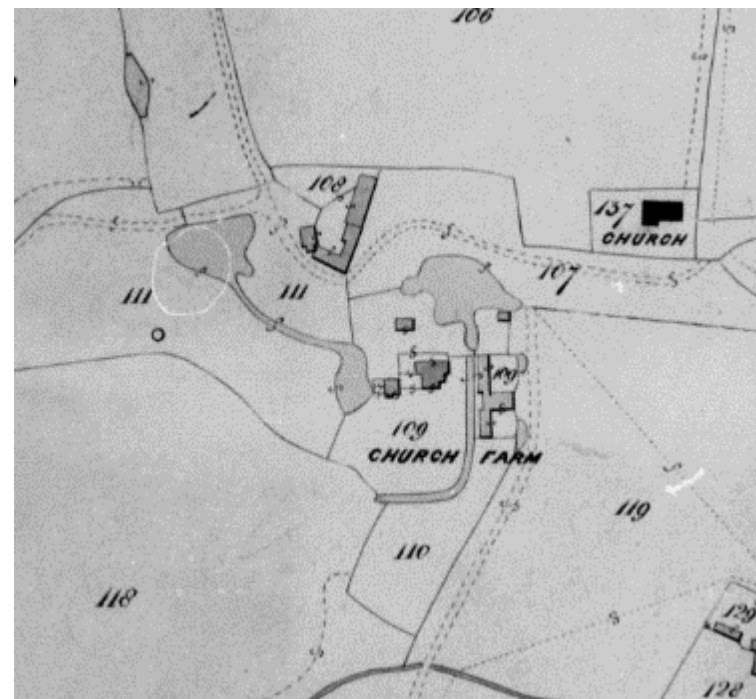


Plate 5: Possible moated site at Church Farm to the east of the Site as detailed on the Ashington Cum Buncton Tithe Map of 1847.

- 6.25. Considering typical layouts of medieval settlements, where the church and manor are located at one end of a village, it is considered likely that the moated site represents the former location of a medieval manor. Based upon a review of later mapping, it is considered likely that these features were located on the western or north-western extent of Ashington during the medieval period.

Post-medieval (1540 – 1800) and Modern (1801 – present)

- 6.26. No post-medieval or modern heritage assets have been identified within the proposed development site within HER datasets.
- 6.27. It is possible to trace the development of the Site from the later post-medieval period through to the modern period through an examination of historic mapping.
- 6.28. The earliest source to depict the Site in detail identified as part of this assessment is the Ashington Cum Buncton Tithe Map of 1847 (Plate 6). This details the main body of the Site as comprising parts of nine land parcels, with the general field morphology similar to that extant today. The access track from Church Lane is visible, although on a slightly different alignment, with the red line boundary also including a now demolished building (thought to have formed part of the Church Farm complex).
- 6.29. The accompany Tithe Apportionment details that the Site as a whole was owned by Sir Charles Merrick Burrell (3rd Baronet) and tenanted by Walter Peachy. The Church Farm complex to the east of the Site was also under the same ownership and tenancy, as was the area covered by the access track. Accordingly, the Site is known to have formed part of the landholding associated with the farm complex at that date.

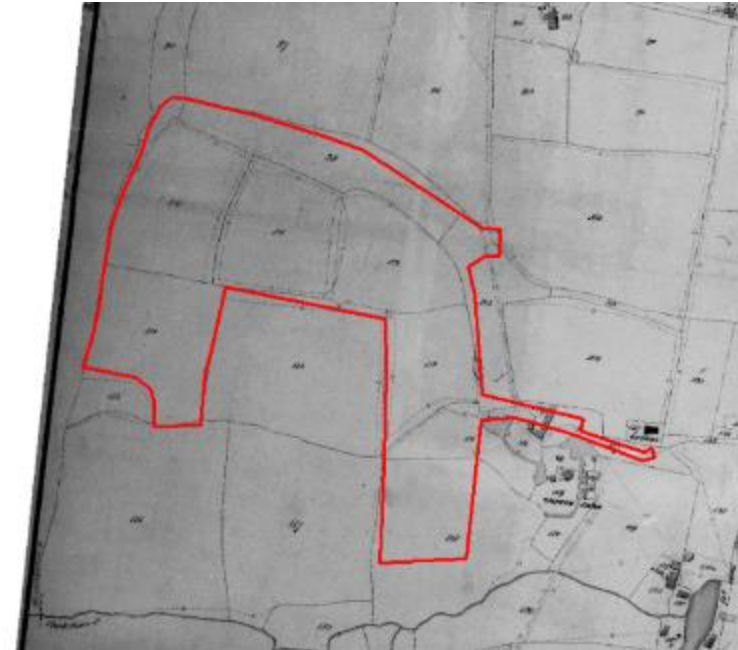


Plate 6: Extract from the Ashington Cum Buncton Tithe Map of 1847.

- 6.30. Cartographic sources demonstrate that little change occurred within the Site during mid-19th to early 20th centuries. Comparison between the 1935 Ordnance Survey Map (Plate 7) and the current arrangement, demonstrates that the only meaningful change which has occurred within the Site during the mid-late 20th and early 21st centuries is the increased planting in the northwest of the Site and minor changes to the arrangement of plots and land use in the eastern part of the Site.



Plate 7: Extract from the Ordnance Survey Map of 1886.



Plate 8: Extract from the Ordnance Survey Map of 1935.

- 6.31. The building depicted within the site boundary on earlier sources was demolished in the mid-late 20th century, and the Church Farm complex in general has been subject to consolidation, in particular in association with the introduction of solely domestic use – see further discussion in **Section 7**.

Statement of Archaeological Potential and Significance

- 6.32. Previous investigations have identified evidence of activity within the southern part of the Site, presumed to be associated with the occupation of the Roman villa to the southwest. As discussed above, the extent and form, and in turn significance of activity within the Site has yet to be tested. At present there is currently no definitive evidence to suggest that the features are of *'demonstrably of equivalent significance'* as the Scheduled Monument, when taking into account all relevant factors, including the morphology of the features indicated by the geophysical survey and the general importance of the fabric covered by the designation.
- 6.33. Nevertheless, we recognise that this is still to be tested, and thus for the purpose of this assessment we will have regard to footnote 68 of the NPPF, whilst noting that this represents a 'worst case scenario'. It is, however, highlighted that based upon current evidence, the likely features identified within the Site would of a lesser significance than the features within the bounds designated area, with this covering the main villa building.
- 6.34. There is currently no evidence to suggest that the identified Roman activity extended further into the Site, and the potential for archaeological remains pertaining to earlier and later period is considered to be low, based upon current evidence.

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.

7. Setting Assessment

- 7.1. With regards to heritage assets within the surrounds of the Site, Step 1 of the methodology recommended by *GPA3* (see methodology), is to identify which heritage assets might be affected by a proposed development.¹⁴
- 7.2. Development proposals may adversely impact heritage assets where they remove a feature which contributes to the significance of a heritage asset, or where they interfere with an element of a heritage asset's setting which contributes to its significance, such as interrupting a key relationship or a designed view.
- 7.3. It is however widely accepted (paragraph 207 of the *NPPF*) that not all parts of a heritage asset will necessarily be of equal significance.¹⁵ In some cases, certain elements of a heritage asset can accommodate substantial changes whilst preserving the significance of the asset.
- 7.4. Significance can be derived from many elements, including the historic fabric of a building or elements of its surrounds.
- 7.5. Consideration, based upon professional judgement and on-site analysis, was therefore made as to whether any of the heritage assets present within the surrounding area may include the site as part of their setting, whether the Site contributes to their overall heritage significance, and whether the assets may potentially be affected by the proposed scheme as a result.
- 7.6. It has been observed that the following heritage assets have the potential to be sensitive to the development proposals and thus these have been taken forward for further assessment below:
- Scheduled Roman building 200yds (180m) NW of Spring Copse.
 - Grade II* Listed Parish Church of St Peter and St Paul.
 - Grade II Listed Church Farmhouse.
- 7.7. It is highlighted that no further designated heritage assets were identified by the LPA or Historic England as having the potential to be sensitive to the development of the Site. We concur with this position.
- 7.8. With regard to any other built heritage assets in the vicinity of the Site, assessment has concluded that the Site does not form any part of setting that positively contributes to overall heritage significance due the nature of the asset and a lack of visual connections, spatial relationships or historic connections. Accordingly, the proposed development is not anticipated to result in a change that would impact upon the overall heritage significance of these assets. Other heritage assets have therefore been excluded from further assessment within this Report.

¹⁴ Historic England, *GPA3*, p. 4.

¹⁵ *DLUHC, NPPF*, para. 207.

- 7.9. The *Planning and Compulsory Purchase Act (2004)* requires that applications for Planning Permission, are determined in accordance with the Development Plan, unless material considerations indicate otherwise. The policy guidance set out within the *NPPF* is considered to be a material consideration which attracts significant weight in the decision-making process.
- 7.10. The statutory requirement set out in Section 66(1) of the *Planning (Listed Buildings and Conservation Areas) Act 1990* confirms that special regard should be given to the preservation of the special historic and architectural interest of Listed Buildings and their settings.
- 7.11. There is no duty under the *Ancient Monuments and Archaeological Areas Act 1979* to have regard to the desirability of preservation of the setting of a Scheduled Monument.
- 7.12. In addition, the *NPPF* states that the impact of development proposals should be considered against the particular significance of heritage assets, such as Listed Buildings and Scheduled Monuments, and this needs to be the primary consideration when determining the acceptability of the proposals.
- 7.13. It is also important to consider whether the proposals cause harm. If they do, then one must consider whether the harm represents "*substantial harm*" or "*less than substantial harm*" to the identified designated heritage assets, in the context of paragraphs 201 and 202 of the

NPPF.¹⁶ With regard to non-designated heritage assets, potential harm should be considered within the context of paragraph 203 of the *NPPF*.¹⁷

- 7.14. The *PPG* clarifies that within each category of harm ("*less than substantial*" or "*substantial*"), the extent of the harm may vary and should be clearly articulated.¹⁸
- 7.15. The guidance set out within the *PPG* also clarifies that "*substantial harm*" is a high test, and that it may not arise in many cases. It makes it clear that it is the degree of harm to the significance of the asset, rather than the scale of development, which is to be assessed.¹⁹ In addition, it has been clarified in a High Court Judgement of 2013 that substantial harm would be harm that would:
- "...have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced."***²⁰
- 7.16. This Section will consider each of the heritage assets detailed above and assess the impact of the proposed development, whether that be harmful or beneficial to the significance identified above.

¹⁶ DLUHC, *NPPF*, paras. 201 and 202.

¹⁷ DLUHC, *NPPF*, para. 203.

¹⁸ DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

¹⁹ DLUHC, *PPG*, Paragraph: 018 (ID: 18a-018-20190723 Revision date: 23.07.2019).

²⁰ EWHC 2847, R DCLG and Nuon UK Ltd v. Bedford Borough Council.

**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 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 surrounded 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).



Plate 12: Aerial photograph detailing the current environs of the Church of St Peter and St Paul and Church Farmhouse.



Plate 13: Extract from late 19th-century Ordnance Survey mapping detailing the limits of the churchyard at that time.



Plate 14: Existing parallel accesses south of the Church, and the location of the proposed new access route.

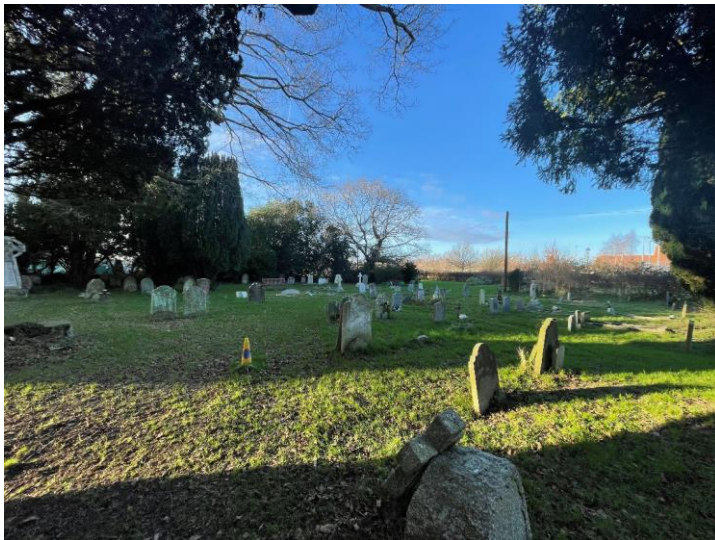


Plate 15: View-north-west from the churchyard.



Plate 16: View west from Church Close.

- 7.43. As discussed in **Section 6**, Church Farm likely represents the site of a former moated manor house. No intervisibility or co-visibility between the Church and surviving historic principal dwelling at Church Farm (Grade II Listed – see further below) was identified during the site visit.

Statement of Significance

- 7.44. The heritage significance of the Church of St Peter and St Paul is primarily embodied in the architectural, artistic, archaeological and historic interest of its physical fabric as an example of a medieval parish church.
- 7.45. The 'setting' of the assets also contributes to their significance, although the significance derived from the setting is less than that from their historic fabric. Considering the above, those elements of the setting of

the church which make the greatest contribution to its heritage significance through setting comprise:

- The settlement of Ashington, which the church served.
- The churchyard, from where the building is best appreciated, and which is functionally associated.
- The roads from where the church is also appreciated.
- The access track to the south, albeit there is a slightly awkward arrangement with the parallel access track.
- The sense of the asset being located on the edge of the settlement, with open land to the north-west.

7.46. As such, the Site is considered to make a minor contribution to the heritage significance of the asset through setting, through contributing to the sense of open aspect to the north-west, albeit beyond the playing field of the school. The current character of the trackway to south of the churchyard, which lies within the site boundary, also contributes to understanding of the historic 'rural' character of the surrounds of the asset.

Assessment of Impact

7.47. The proposed development would not result in any physical changes to the Church of St Peter and St Paul, or its associated churchyard. It would also not alter the relationship between the Church and the settlement of Ashington.

7.48. The Site boundary runs along the southern edge of the churchyard as a result of incorporating the trackway to the south; however, the main body of the Site, within which residential development will be focused, is located c.190m west of the Church at its closet point.

7.49. The introduction of the residential development within the Site would remove the open aspect to the northwest of the Church and result in a change in character from rural agricultural to urban development within its environs. Although separation would remain between the two as a result of the existing playing fields, the proposals would result in a change that would impact upon the experience of the asset from within its immediate locality, in particular from Church Close to the east. The understanding of the asset being located on the edge of the settlement would be reduced, and from some vantage points removed. The resulting change would result in a minor impact on the overall heritage significance of the asset.

7.50. The proposed development will be accessed via the existing trackway located to the south of the Parish Church of St Peter and St Paul, extending westwards from Church Close (Plate 13). This is the access route allocated for the development under Policy ASH11 of the Ashington Neighbourhood Plan 2019–2031, the accompanying text of which states that: *"The design of this vehicular access must protect the setting of the Church and the Church Farm House, both of which are listed properties."*

7.51. Pre-Application from Horsham District Council on this matter set out: *"Whilst there is concern regarding the access into the site, initial plans submitted as part of the NP revealed an access arrangement could be achieved that provided a good level of separation from and*

protection of the adjacent listed heritage asset." See Section 1.

- 7.52. The existing trackway would be upgraded, including the widening of the route and the introduction of a new entrance arrangement. The proposed design has, however, been carefully developed in order to suitably respond to the context and minimise impacts of the built historic environment. This includes the retention of a grass verge between the route and walls of the churchyard to the north, and the retention and enhancement of grass verges and planting along the course of the route in general.
- 7.53. Although resulting in the widening of the existing trackway and the introduction of a more engineered appearance, 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.
- 7.54. Overall, the change resulting from the development as a whole is considered to result in less than substantial harm to the overall heritage significance of the asset, via a change in setting. This is classified as at the lower end of the less than substantial harm spectrum.



Plate 17: Aerial photograph of the trackway as existing.



Plate 18: The new access route as proposed.

Church Farmhouse

- 7.55. Church Farmhouse was added to the National List, at Grade II, on 15th March 1955. The asset comprises a 17th-century, or possibly earlier, timber framed building with plaster infill and Horsham slab roof. The structures may lie on the site of an earlier medieval manor, within an area that was formerly moated – see **Section 6**.
- 7.56. The Site was historically under the same ownership as Church Farm, as documented by the Ashington cum Buncton Tithe Map of 1847, forming part of the landholding of the farm complex.
- 7.57. The dwelling no longer appears to be part of an active farm complex, and is situated within a clearly domestic demise consisting of lawn areas, a terrace and a gravel driveway, all enclosed by mature vegetation planting (see Plate 18). A couple of structures visible on historic mapping (see **Section 6**) may remain within the domestic curtilage of the house, with these likely remaining in ancillary use of some form. 'Agricultural buildings' now within the immediate environs of the dwelling are located to the northwest and comprise a grouping of modern buildings, some of which are in commercial use. There is no clear connection (spatial, visual or functional) between the buildings and the asset.



Plate 19: Looking east towards the demise of Church Farmhouse from within the Site. Church Farmhouse is screened by mature vegetation.

- 7.58. As with the Church, the dwelling is located on the edge of the settlement of Ashington, with undeveloped areas to the west, including the Site, beyond the mature vegetation boundary. As detailed in **Section 6**, these areas historically formed part of the historic landholdings associated with the farm complex.
- 7.59. The dwelling, which served as the principal farmhouse for the former farm complex, and its associated demise is now separated from the wider landscape to the west by the mature vegetation boundary which encloses the domestic curtilage. As a result, there is no clear understanding of the historic relationship between the dwelling and the wider landscape to the west. The vegetation boundary also limits outward views from the

asset and its demise to the west, although some intervisibility with the agricultural land to the west, including southern areas of the Site, exists.

Statement of Significance

- 7.60. The heritage significance of the asset is primarily embodied in the architectural, archaeological and historic interest of its physical fabric as an example of a 17th-century vernacular buildings, utilised for part of its life as a farmhouse and potentially on the site of an earlier manorial complex.
- 7.61. The 'setting' of the asset also contributes to the heritage significance, but to a lesser degree than its physical fabric. Those elements of the setting of the asset which make the greatest contribution to the significance of the asset through setting comprise:
- The remains of the former moat in which it lies, as this is likely to have been the reason for its siting.
 - Any surviving formerly associated farm buildings, which give legibility to the agricultural use of the building.
 - The settlement of Ashington, which it was located on the edge of.
 - The formerly associated agricultural land in the immediate vicinity of the asset, with which it has intervisibility.
- 7.62. Within the context of the above, the southernmost part of the Site is considered to make a very minor contribution to the overall heritage significance of the

asset, through setting. This derives from this area comprising agricultural land formerly associated with the asset, with which the asset has heavily filtered intervisibility.

- 7.63. When taking into account the level of changes which has occurred and the current baseline, it is not considered that the remainder of the Site, approximately to the north of the existing trackway which extends westwards from the commercial buildings, makes any meaningful contribution to the overall significance of the asset.
- 7.64. The current character of the trackway from Church Lane, which forms part of the approach to the current domestic demise of Church Farmhouse, is considered to make a very minor contribution, at most, to the overall heritage significance of the asset. This is derived from the contribution which this asset makes to the experience and appreciation of the edge of settlement location of the asset and historic rural context.

Assessment of Impact

- 7.65. The proposed development would not result in any physical changes to Church Farmhouse. It would also not alter the siting of the asset within the bounds of the former moat, or its relationship with any surviving former associated farm buildings.
- 7.66. As set out above, the element of the Site which is considered to be the most sensitive with regard to Church Farmhouse is that to the south the existing trackway. The majority of this area will be utilised as a sports pitch, with only a minor element of residential development proposed in the far northern part of this area. The proposed as a whole would not abut the

domestic demise asset, with separation provided by an existing pond and the commercial buildings. The proposed residential development will be c.65m from the boundary of the domestic demise, and c.100m from the asset itself.



Plate 20: Extract from the proposed site layout focused upon the extent of development within the vicinity of Church Farmhouse.

- 7.67. Although this aspect of the proposed development will result in the introduction of new residential built form into an area which makes a very minor, at most, contribution to the overall heritage significance of the asset, the level of harm that will arise has been minimised as a result of the informed positioning of the built form in order to limit the extent of intervisibility and co-visibility that would occur.

- 7.68. It is acknowledged that a change from open agricultural land to a 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. Furthermore, an area of unchanged land will remain between the sports pitches and the boundary of the domestic demise, as clearly demonstrated at Plate 20.

- 7.69. The access route to the north of the domestic demise of Church Farmhouse will be subject to change. For the reasons set out above it is concluded that the resulting change would have only a very limited impact upon the overall experience and appreciation of Church Farmhouse, in particular when taking into account the level of change that has already occurred to the domestic demise and approach to the asset. The proposed landscaping and planting would also limit the impact on the understanding of the historic 'rural' character of the surrounds of the Site.

- 7.70. Overall, the resulting change is considered to result in less than substantial harm to the overall heritage significance of the asset, via a change in setting. This is classified as at the very lower end of the less than substantial harm spectrum.

8. Conclusions

- | | |
|---|--|
| <p>8.1. The Site is allocated for development under Policy ASH11 Ashington Neighbourhood Plan (2021), with the proposed areas of residential development and open space accordingly with the parameters set out under this policy.</p> <p>8.2. Previous investigations have identified evidence of activity within the southern part of the Site, thought to be associated with the occupation of the Roman villa to the southwest. As discussed above, the extent and form, and in turn significance of activity within the Site has yet to be tested. At present there is currently no definitive evidence to suggest that the features are of <i>'demonstrably of equivalent significance'</i> as the Scheduled Monument; however, for the purpose of this assessment we will have regard to footnote 68 of the NPPF, whilst noting that this represents a 'worst case scenario'.</p> <p>8.3. 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. The works required as part of the establishment of the sports pitches has been carefully designed to reduce potential impacts on below ground archaeological remains, and minimise impacts to the Scheduled villa, via a change in setting.</p> <p>8.4. It is considered 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.</p> | <p>8.5. A degree of harm will arise 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.</p> <p>8.6. The only Listed Buildings identified as having the potential to be sensitive to the proposed development comprise the Grade II* Listed Church of St Peter and St Paul and the Grade II Listed Church Farmhouse. The scheme has been developed in order to minimise potential impacts on this asset, in particular with regard to the treatment of the access route and the siting of residential development in the southern part of the Site.</p> <p>8.7. A degree of harm will, however, still arise to these assets with this principally resulting from the changes to urbanisation of 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).</p> <p>8.8. The harm identified is classified 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.</p> <p>8.9. The less than substantial harm identified above requires consideration under Paragraph 202 of the NPPF.</p> <p>8.10. Whilst recognising the 'great weight' to be given to the conservation of heritage assets, and the statutory duty</p> |
|---|--|

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.²¹

- 8.11. Specifically, 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.²²

²¹ Palmer v Herefordshire Council & Anor [2016] EWCA Civ 1061.

²² Jones v Mordue [2015] EWCA Civ 1243.

Appendix 1: Gazetteer of Historic Environment Record Data

Heritage Data

HER Event Data

Ev UID	Name	Event Type
EWS1383	Church Farm, Ashington – Geophysical Survey	EVS
EWS1728	Land at Ashington Mill, Ashington – Desk Based Assessment	DBA
EWS1924	Church Farm – Site of a Roman Villa, Ashington – Geophysical Survey	EVS
EWS1987	Gradiometer Survey on Last West of Ashington	EVS
EWS1988	Archaeological Evaluation on Land West of Ashington	EVT
EWS1990	Geophysical Survey at Land East of the Roman Building at Ashington, West Sussex	EVS
EWS1992	Ashington Site 5 and Site 6 – Heritage Assessment	DBA
EWS410	Part Excavation – Roman Building, Ashington	EVT
EWS786	Land at Ashington, Horsham – Desk Based Assessment	EVS

HER Monument Data

Mon UID	Pref Ref	Name	Mon Type	Period
MWS14415	MWS14415	Middle Bronze Age Palstave, Church Farm, Ashington	FINDSPOT	Prehistoric
MWS6354	MWS6354	Land adj to Rectory Close, Ashington – Watching Brief	FLINT SCATTER; DITCH	Prehistoric and Post-medieval to Modern
MWS1290	MWS1290	Roman Building, Ashington	OCCUPATION SITE; DITCH; BUILDING; VILLA?	Romano-British
MWS4033	MWS4033	Roman 'material' – Church Farm	OCCUPATION SITE?	Romano-British
MWS15027	MWS15027	Possible Bath House Structure located East of the Spring Copse Roman Villa, Ashington	BATH HOUSE?; KILN?; OVEN?; FURNACE?; FIELD SYSTEM?; DITCH?; PIT?	Romano-British
MWS7038	MWS7038	Archaeological Evaluation and Gradiometer Survey on Land West of Ashington	DITCH; PIT?; DITCH	Early Medieval to Medieval
MWS1155	MWS1155	The Parish Church of St Peter and St Paul, Ashington	PARISH CHURCH; LANCET WINDOW; WINDOW; NAVE; BELL TOWER; PARISH CHURCH; CHANCEL; REREDOS; FONT; AISLE; PORCH; NAVE; BELL TOWER; PARISH CHURCH; WAR MEMORIAL; PLAQUE; PLAQUE; WAR MEMORIAL; WINDOW; WINDOW; WINDOW; TOILET; KITCHEN	Early Medieval to Medieval
MWS4254	MWS4254	Moated site – Church Farm	MOAT	Early Medieval to Medieval

MWS12391	MWS12391	Mitchbourne Farm Historic Farmstead, Ashington	FARMSTEAD	Post-medieval to Modern
MWS13285	MWS13285	Park Barn Historic Farmstead, Ashington	FARMSTEAD	Post-medieval to Modern
MWS13400	MWS13400	Rectory Cottage Historic Farmstead, Ashington	FARMSTEAD; FARMHOUSE	Post-medieval to Modern
MWS14076	MWS14076	Yard East of Church Farm, Ashington	OUTFARM	Post-medieval to Modern
MWS408	MWS408	Watermill – Ashington	WATERMILL	Post-medieval to Modern
MWS409	MWS409	Windmill – Ashington	WINDMILL	Post-medieval to Modern
MWS410	MWS410	Post House? – Ashington	COACHING INN?	Post-medieval to Modern
MWS7032	MWS7032	Watching Brief, Mill Mead, Ashington	BOUNDARY	Post-medieval to Modern
MWS7033	MWS7033	Watching Brief, London Road – Ashington	FIELD BOUNDARY	Post-medieval to Modern
MWS9510	MWS9510	Broadbridge Farm Historic Farmstead, Ashington	FARMSTEAD	Post-medieval to Modern
MWS9764	MWS9764	Church Farm Historic Farmstead, Ashington	FARMSTEAD; U SHAPE PLAN; L SHAPE PLAN	Post-medieval to Modern

MWS9510	MWS9510	Broadbridge Farm Historic Farmstead, Ashington	FARMSTEAD	Post-medieval to Modern
MWS7274	MWS7274	Archaeological evaluation – Church Close	Negative Evidence	N/A

Historic England Data

Historic England Listed Buildings

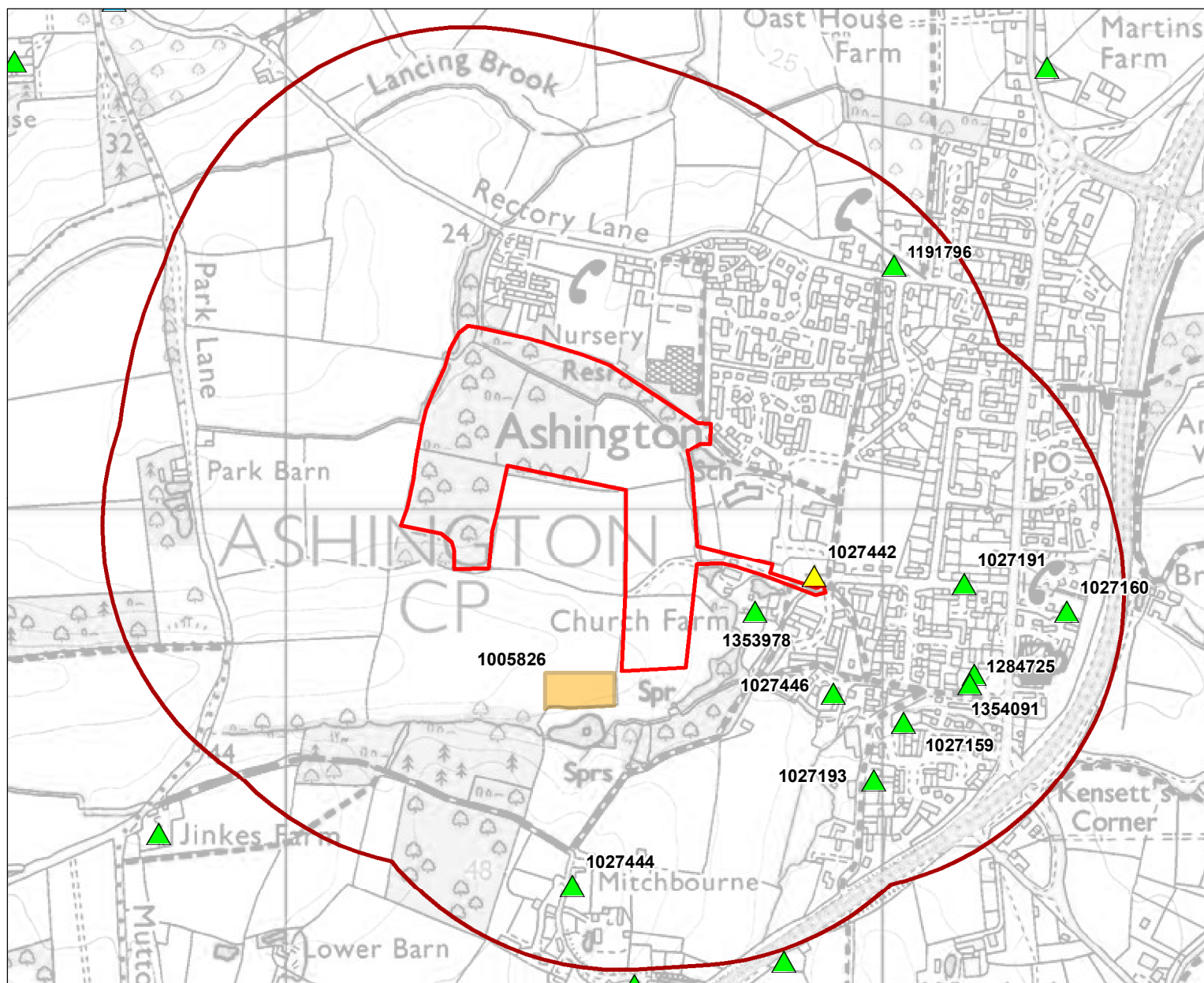
List Entry	Name	Grade	Eastings	Northings
1027159	THE WILLOWS	II	513034.2367	115645.4533
1027160	THE LORNIES	II	513307	115830.3608
1027191	22 – 26 (CONS.), CHURCH LANE	II	513135.74	115877.2201
1027193	MILL HOUSE HOTEL	II	512984	115549.3608
1027442	THE PARISH CHURCH OF ST PETER AND ST PAUL	II*	512884	115890.3608
1027444	MITCHBORNE	II	512479	115371.3608
1027446	MANOR COTTAGE WILLOW WREN	II	512916	115693.3608

1191796	LAUREL COTTAGE ORCHARD COTTAGE	II	513017.6268	116411.29
1284725	THE STABLES OF THE RED LION HOTEL TO THE NORTH	II	513152	115725.3608
1353978	CHURCH FARMHOUSE	II	512785.3647	115831.1667
1354091	THE RED LION HOTEL AND THE ADJOINING COTTAGE TO THE NORTH WEST	II	513145	115709.3608

Historic England Scheduled Monuments

List Entry	Name	Eastings	Northings
1005826	Roman building 200yds (180m) NW of Spring Copse	512491.049079	115698.219192

Appendix 2: Figures



KEY

- Site
- 500m study area
- Scheduled Monuments

Listed Buildings

Grade

- ▲ I
- ▲ II*
- ▲ II

Revisions:
First Issue- 30/11/2021 RGO

Figure 1: Designated Heritage Assets

Land West of Ashington School, Ashington

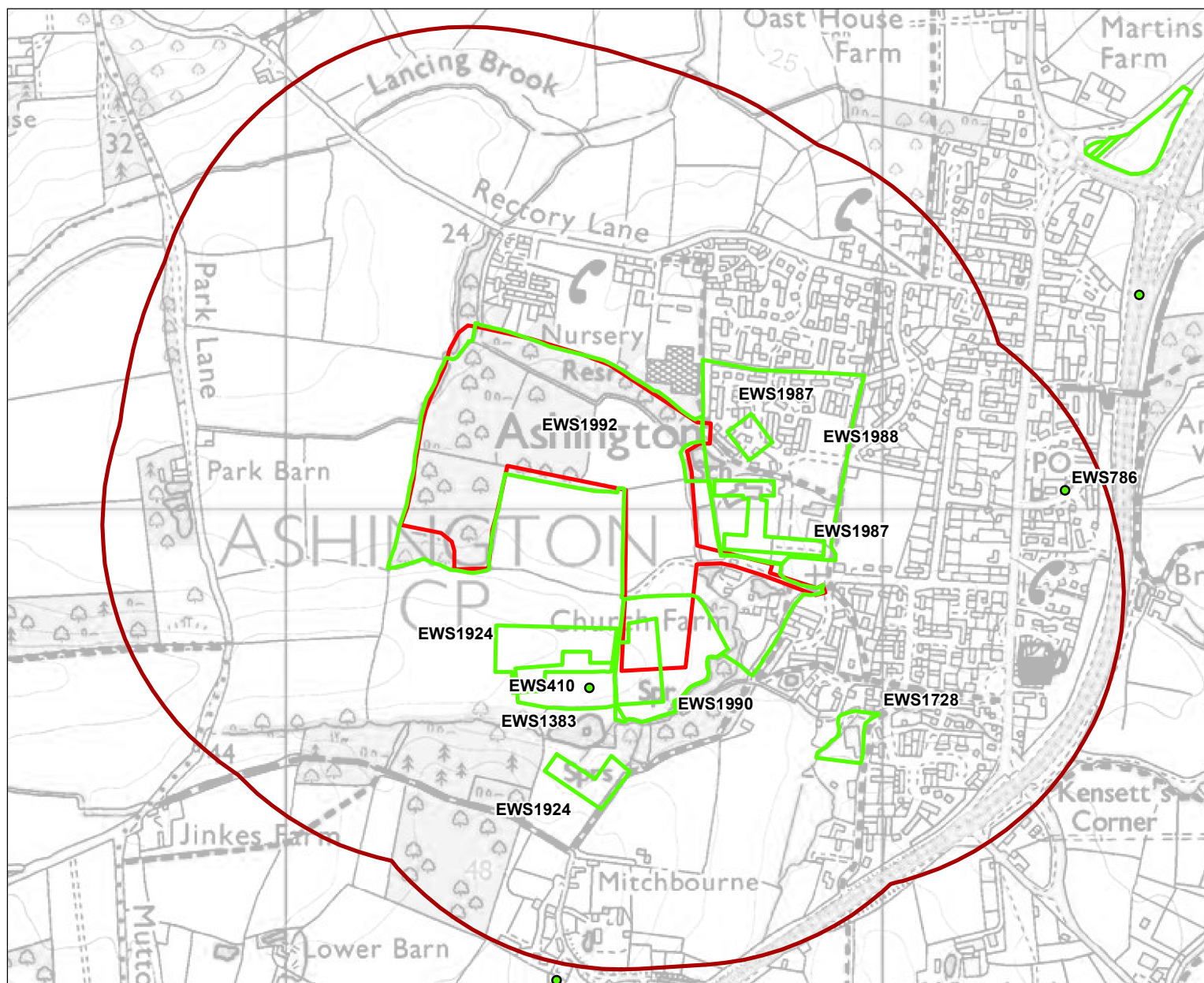
Client: Bellway Homes Ltd

DRWG No: P21-3540 Sheet No: - REV: -

Drawn by: RGO Approved by: GS

Date: 30/11/2021

Scale: 1:10,000 @ A3 **Pegasus**
Group



KEY

- Site
- 500m study area
- HER 'Event' point
- HER 'Event' area

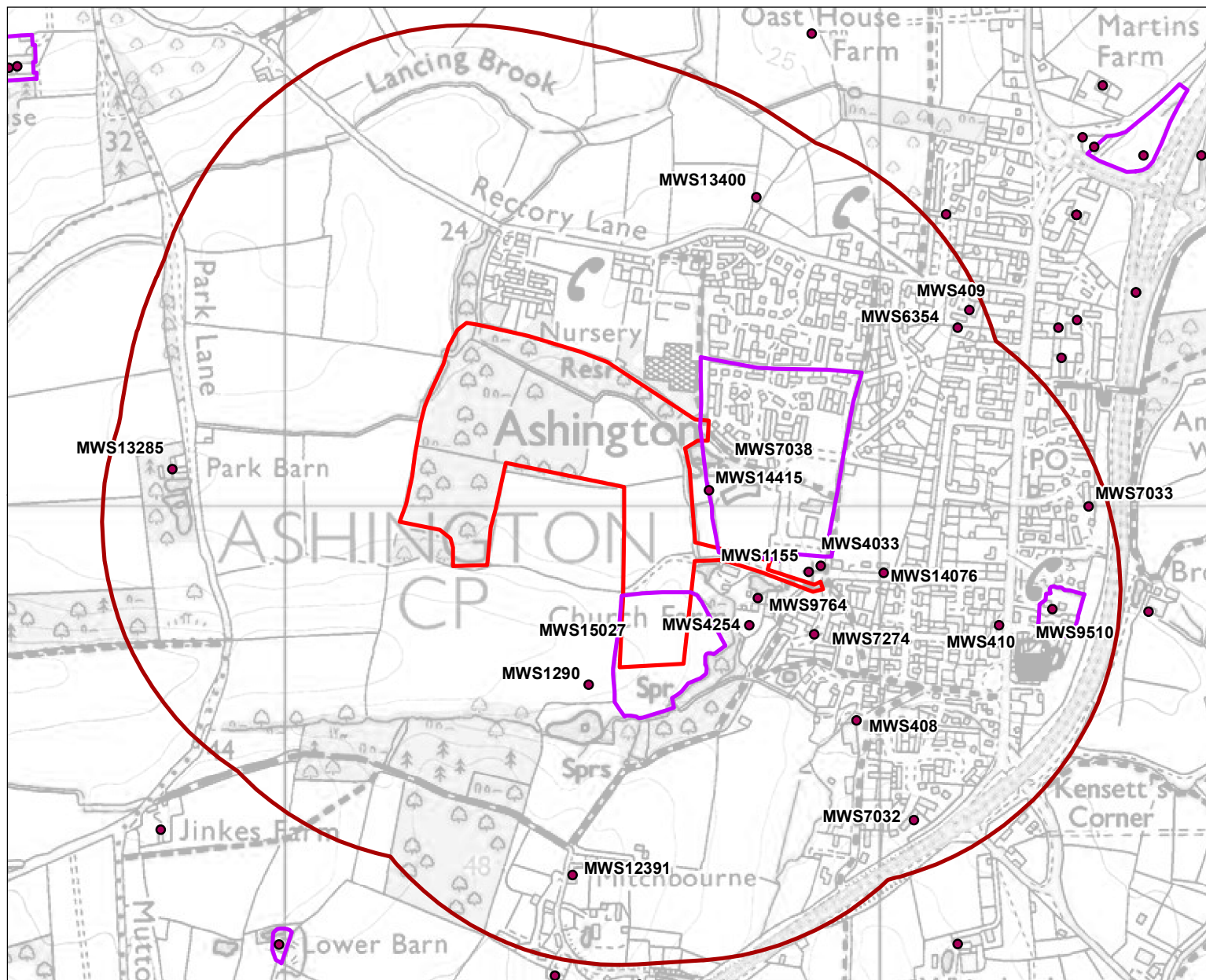
Revisions:
First Issue- 30/11/2021 RGO

Figure 2: HER 'Events'

Land West of Ashington School, Ashington

Client: Bellway Homes Ltd
 DRWG No: P21-3540 Sheet No: - REV: -
 Drawn by: RGO Approved by: GS
 Date: 30/11/2021
 Scale: 1:10,000 @ A3

Pegasus
Group



KEY

- Site
- 500m study area
- HER 'Monument' point
- HER 'Monument' area

Revisions:
First Issue- 30/11/2021 RGO

Figure 3: HER 'Monuments'

Land West of Ashington
School, Ashington

Client: Bellway Homes Ltd

DRWG No: P21-3540 Sheet No: - REV: -

Drawn by: RGO Approved by: GS

Date: 30/11/2021

Scale: 1:10,000 @ A3 **Pegasus**
Group

Appendix 3: Assessment Methodology

Assessment of significance

In the *NPPF*, heritage significance is defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”²³

Historic England's *GPA:2* gives advice on the assessment of significance as part of the application process. It advises understanding the nature, extent, and level of significance of a heritage asset.²⁴

In order to do this, *GPA 2* also advocates considering the four types of heritage value an asset may hold, as identified in English Heritage's *Conservation Principles*.²⁵ These essentially cover the heritage ‘interests’ given in the glossaries of the *NPPF* and the *PPG* which are archaeological, architectural and artistic, and historic.²⁶

The *PPG* provides further information on the interests it identifies:

- **Archaeological interest:** *As defined in the Glossary to the National Planning Policy Framework, there will*

be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.

- **Architectural and artistic interest:** These are interests in the design and general aesthetics of a place. They can arise from conscious design or fortuitously from the way the heritage asset has evolved. More specifically, architectural interest is an interest in the art or science of the design, construction, craftsmanship and decoration of buildings and structures of all types. Artistic interest is an interest in other human creative skills, like sculpture.
- **Historic interest:** An interest in past lives and events (including pre-historic). Heritage assets can illustrate or be associated with them. Heritage assets with historic interest not only provide a material record of our nation’s history, but can also provide meaning for communities derived from their collective experience of a place and can symbolise wider values such as faith and cultural identity.²⁷

Significance results from a combination of any, some, or all of the interests described above.

²³ DLUHC, *NPPF*, pp. 71–72.

²⁴ Historic England, *GPA:2*.

²⁵ Historic England, *Conservation Principles: Policies and Guidance for the Sustainable Management of the Historic Environment* (London, April 2008). These heritage values

are identified as being ‘aesthetic’, ‘communal’, ‘historical’ and ‘evidential’, see *idem* pp. 28–32.

²⁶ DLUHC, *NPPF*, p. 71; DLUHC, *PPG*, Annex 2.

²⁷ DLUHC, *PPG*, paragraph 006, reference ID: 18a-006-20190723.

The most-recently issued Historic England guidance on assessing heritage significance, *HEAN:12*, advises using the terminology of the *NPPF* and *PPG*, and thus it is that terminology which is used in this Report.²⁸

Listed Buildings and Conservation Areas are generally designated for their special architectural and historic interest. Scheduling is predominantly, although not exclusively, associated with archaeological interest.

Setting and significance

As defined in the *NPPF*:

“Significance derives not only from a heritage asset’s physical presence, but also from its setting.”²⁹

Setting is defined as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.”³⁰

Therefore, setting can contribute to, affect an appreciation of significance, or be neutral with regards to heritage values.

Assessing change through alteration to setting

How setting might contribute to these values has been assessed within this Report with reference to *GPA:3*, particularly the checklist given on page 11. This advocates the clear articulation of “*what matters and why*”.³¹

In *GPA:3*, a stepped approach is recommended, of which Step 1 is to identify which heritage assets and their settings are affected. Step 2 is to assess whether, how and to what degree settings make a contribution to the significance of the heritage asset(s) or allow significance to be appreciated. The guidance includes a (non-exhaustive) checklist of elements of the physical surroundings of an asset that might be considered when undertaking the assessment including, among other things: topography, other heritage assets, green space, functional relationships and degree of change over time. It also lists aspects associated with the experience of the asset which might be considered, including: views, intentional intervisibility, tranquillity, sense of enclosure, accessibility, rarity and land use.

Step 3 is to assess the effect of the proposed development on the significance of the asset(s). Step 4 is to explore ways to maximise enhancement and minimise harm. Step 5 is to make and document the decision and monitor outcomes.

A Court of Appeal judgement has confirmed that whilst issues of visibility are important when assessing setting, visibility does not necessarily confer a contribution to significance and factors other than visibility should also be considered, with Lindblom LJ stating at

²⁸ Historic England, *Statements of Heritage Significance: Analysing Significance in Heritage Assets*, Historic England Advice Note 12 (Swindon, October 2019).

²⁹ DLUHC, *NPPF*, p. 72.

³⁰ DLUHC, *NPPF*, p. 71.

³¹ Historic England, *GPA:3*, pp. 8, 11.

paragraphs 25 and 26 of the judgement (referring to an earlier Court of Appeal judgement):

Paragraph 25 – “But – again in the particular context of visual effects – I said that if “a proposed development is to affect the setting of a listed building there must be a distinct visual relationship of some kind between the two – a visual relationship which is more than remote or ephemeral, and which in some way bears on one’s experience of the listed building in its surrounding landscape or townscape” (paragraph 56)”.

Paragraph 26 – “This does not mean, however, that factors other than the visual and physical must be ignored when a decision-maker is considering the extent of a listed building’s setting. Generally, of course, the decision-maker will be concentrating on visual and physical considerations, as in Williams (see also, for example, the first instance judgment in R. (on the application of Miller) v North Yorkshire County Council [2009] EWHC 2172 (Admin), at paragraph 89). But it is clear from the relevant national policy and guidance to which I have referred, in particular the guidance in paragraph 18a–013–20140306 of the PPG, that the Government recognizes the potential relevance of other considerations – economic, social and historical. These other considerations may include, for example, “the historic relationship between places”. Historic England’s advice in GPA3 was broadly to the same effect.”³²

Levels of significance

Descriptions of significance will naturally anticipate the ways in which impacts will be considered. Hence descriptions of the significance of Conservation Areas will make reference to their special interest and character and appearance, and the significance of Listed Buildings will be discussed with reference to the building, its setting and any features of special architectural or historic interest which it possesses.

In accordance with the levels of significance articulated in the *NPPF* and the *PPG*, three levels of significance are identified:

- **Designated heritage assets of the highest significance**, as identified in paragraph 200 of the *NPPF*, comprising Grade I and II* Listed buildings, Grade I and II* Registered Parks and Gardens, Scheduled Monuments, Protected Wreck Sites, World Heritage Sites and Registered Battlefields (and also including some Conservation Areas) and non-designated heritage assets of archaeological interest which are demonstrably of equivalent significance to Scheduled Monuments, as identified in footnote 68 of the *NPPF*;³³
- **Designated heritage assets of less than the highest significance**, as identified in paragraph 200 of the *NPPF*, comprising Grade II Listed buildings and Grade II Registered Parks and Gardens (and also some Conservation Areas);³⁴ and

³² *Catesby Estates Ltd. v. Steer* [2018] EWCA Civ 1697, paras. 25 and 26.

³³ *DLUHC, NPPF*, para. 200 and fn. 68.

³⁴ *DLUHC, NPPF*, para. 200.

- **Non-designated heritage assets.** Non-designated heritage assets are defined within the PPG as *"buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of significance meriting consideration in planning decisions, but which do not meet the criteria for designated heritage assets"*.³⁵

Additionally, it is of course possible that sites, buildings or areas have no heritage significance.

Assessment of harm

Assessment of any harm will be articulated in terms of the policy and law that the proposed development will be assessed against, such as whether a proposed development preserves or enhances the character or appearance of a Conservation Area, and articulating the scale of any harm in order to inform a balanced judgement/weighting exercise as required by the NPPF.

In accordance with key policy, the following levels of harm may potentially be identified for designated heritage assets:

- **Substantial harm or total loss.** It has been clarified in a High Court Judgement of 2013 that this would be harm that would *"have such a serious impact on the significance of the asset that its significance was either vitiated altogether or very much reduced"*,³⁶ and

- **Less than substantial harm.** Harm of a lesser level than that defined above.

With regards to these two categories, the PPG states:

"Within each category of harm (which category applies should be explicitly identified), the extent of the harm may vary and should be clearly articulated."³⁷

Hence, for example, harm that is less than substantial would be further described with reference to where it lies on that spectrum or scale of harm, for example low end, middle, and upper end of the less than substantial harm spectrum/scale.

With regards to non-designated heritage assets, 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. Harm to such assets is therefore articulated as a level of harm to their overall significance, using descriptors such as minor, moderate and major harm.

It is also possible that development proposals will cause no harm or preserve the significance of heritage assets. Here, a High Court Judgement of 2014 is relevant. This concluded that with regard to preserving the setting of a Listed building or preserving the character and appearance of a Conservation Area, *"preserving"* means doing *"no harm"*.³⁸

Preservation does not mean no change, it specifically means no harm. GPA:2 states that *"Change to heritage assets is inevitable but*

³⁵ DLUHC, PPG, paragraph 039, reference ID: 18a-039-20190723.

³⁶ Bedford Borough Council v Secretary of State for Communities and Local Government [2013] EWHC 2847 (Admin), para. 25.

³⁷ DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

³⁸ R (Forge Field Society) v Sevenoaks District Council [2014] EWHC 1895 (Admin).

it is only harmful when significance is damaged".³⁹ Thus, change is accepted in Historic England's guidance as part of the evolution of the landscape and environment. It is whether such change is neutral, harmful or beneficial to the significance of an asset that matters.

As part of this, setting may be a key consideration. When evaluating any harm to significance through changes to setting, this Report follows the methodology given in *GPA:3*, described above. Fundamental to this methodology is a consideration of "*what matters and why*".⁴⁰ Of particular relevance is the checklist given on page 13 of *GPA:3*.⁴¹

It should be noted that this key document also states:

"Setting is not itself a heritage asset, nor a heritage designation..."⁴²

Hence any impacts are described in terms of how they affect the significance of a heritage asset, and heritage interests that contribute to this significance, through changes to setting.

With regards to changes in setting, *GPA:3* states that:

"Conserving or enhancing heritage assets by taking their settings into account need not prevent change".⁴³

Additionally, whilst the statutory duty requires that special regard should be paid to the desirability of not harming the setting of a Listed Building, that cannot mean that any harm, however minor,

would necessarily require Planning Permission to be refused. This point has been clarified in the Court of Appeal.⁴⁴

Benefits

Proposed development may also result in benefits to heritage assets, and these are articulated in terms of how they enhance the heritage interests, and hence the significance, of the assets concerned.

As detailed further in **Appendix 5**, the *NPPF* (at Paragraphs 201 and 202) requires harm to a designated heritage asset to be weighed against the public benefits of the development proposals.⁴⁵

Recent High Court Decisions have confirmed that enhancement to the historic environment should be considered as a public benefit under the provisions of Paragraphs 201 to 202.⁴⁶

The *PPG* provides further clarity on what is meant by the term 'public benefit', including how these may be derived from enhancement to the historic environment ('heritage benefits'), as follows:

"Public benefits may follow from many developments and could be anything that delivers economic, social or environmental objectives as described in the National Planning Policy Framework (paragraph 8). Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and not just be a

³⁹ Historic England, *GPA:2*, p. 9.

⁴⁰ Historic England, *GPA:3*, p. 8.

⁴¹ Historic England, *GPA:3*, p. 13.

⁴² Historic England, *GPA:3*, p. 4.

⁴³ Historic England, *GPA 3*, p. 8.

⁴⁴ *Palmer v Herefordshire Council & Anor* [2016] EWCA Civ 1061.

⁴⁵ *DLUHC, NPPF*, paras. 201 and 202.

⁴⁶ Including – *Kay, R (on the application of) v Secretary of State for Housing Communities and Local Government & Anor* [2020] EWHC 2292 (Admin); *DLUHC, NPPF*, paras. 201 and 202.

private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits, for example, works to a listed private dwelling which secure its future as a designated heritage asset could be a public benefit.

Examples of heritage benefits may include:

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation.*⁴⁷

Any "heritage benefits" arising from the proposed development, in line with the narrative above, will be clearly articulated in order for them to be taken into account by the decision maker.

⁴⁷ MHCLG, PPG, paragraph 020, reference ID: 18a-020-20190723.

Appendix 4: Legislative Framework

Legislation relating to the built historic environment is primarily set out within the *Planning (Listed Buildings and Conservation Areas) Act 1990*, which provides statutory protection for Listed Buildings and Conservation Areas.⁴⁸ It does not provide statutory protection for non-designated or Locally Listed heritage assets.

Section 66(1) of the Act goes on to state that:

“In considering whether to grant planning permission [or permission in principle] for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State, shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”⁴⁹

In the 2014 Court of Appeal judgement in relation to the Barnwell Manor case, Sullivan LJ held that:

“Parliament in enacting section 66(1) did intend that the desirability of preserving the settings of listed buildings should not simply be given careful consideration by the decision-maker for the purpose of deciding whether there would be some harm, but should be given “considerable importance and weight”

⁴⁸ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990.

⁴⁹ UK Public General Acts, Planning (Listed Buildings and Conservation Areas) Act 1990, Section 66(1).

⁵⁰ Barnwell Manor Wind Energy Ltd v (1) East Northamptonshire DC & Others [2014] EWCA Civ 137. para. 24.

when the decision-maker carries out the balancing exercise.”⁵⁰

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 version of the NPPF, the requirements of which are now given in paragraph 202 of the current, revised NPPF, see **Appendix 5**), this is in keeping with the requirements of the 1990 Act.⁵¹

In addition to the statutory obligations set out within the *Planning (Listed Buildings and Conservation Area) Act 1990*, Section 38(6) of the *Planning and Compulsory Purchase Act 2004* requires that all planning applications, including those for Listed Building Consent, are determined in accordance with the Development Plan unless material considerations indicate otherwise.⁵²

Scheduled Monuments are protected by the provisions of the *Ancient Monuments and Archaeological Areas Act 1979* which relates to nationally important archaeological sites.⁵³ Whilst works to Scheduled Monuments are subject to a high level of protection, it is important to note that there is no duty within the 1979 Act to have regard to the desirability of preservation of the setting of a Scheduled Monument.

⁵¹ Jones v Mordue [2015] EWCA Civ 1243.

⁵² UK Public General Acts, Planning and Compulsory Purchase Act 2004, Section 38(6).

⁵³ UK Public General Acts, *Ancient Monuments and Archaeological Areas Act 1979*.

Appendix 5: National Policy Guidance

The National Planning Policy Framework (July 2021)

National policy and guidance is set out in the Government's *National Planning Policy Framework (NPPF)* published in July 2021. This replaced and updated the previous *NPPF* 2019. The *NPPF* needs to be read as a whole and is intended to promote the concept of delivering sustainable development.

The *NPPF* sets out the Government's economic, environmental and social planning policies for England. Taken together, these policies articulate the Government's vision of sustainable development, which should be interpreted and applied locally to meet local aspirations. The *NPPF* continues to recognise that the planning system is plan-led and that therefore Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application, including those which relate to the historic environment.

The overarching policy change applicable to the proposed development is the presumption in favour of sustainable development. This presumption in favour of sustainable development (the 'presumption') sets out the tone of the Government's overall stance and operates with and through the other policies of the *NPPF*. Its purpose is to send a strong signal to all those involved in the planning process about the need to plan positively for appropriate new development; so that both plan-making and development management are proactive and driven by a search for opportunities to deliver sustainable development, rather than barriers. Conserving historic assets in a manner appropriate to their significance forms part of this drive towards sustainable development.

The purpose of the planning system is to contribute to the achievement of sustainable development and the *NPPF* sets out three 'objectives' to facilitate sustainable development: an economic objective, a social objective, and an environmental objective. The presumption is key to delivering these objectives, by creating a positive pro-development framework which is underpinned by the wider economic, environmental and social provisions of the *NPPF*. The presumption is set out in full at paragraph 11 of the *NPPF* and reads as follows:

"Plans and decisions should apply a presumption in favour of sustainable development.

...

For decision-taking this means:

- a. approving development proposals that accord with an up-to-date development plan without delay; or***
- b. where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:***
 - i. the application policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or***

- ii. **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.**⁵⁴

However, it is important to note that footnote 7 of the NPPF applies in relation to the final bullet of paragraph 11. This provides a context for paragraph 11 and reads as follows:

“The policies referred to are those in this Framework (rather than those in development plans) relating to: habitats sites (and those sites listed in paragraph 180) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, an Area of Outstanding Natural Beauty, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest referred to in footnote 68); and areas at risk of flooding or coastal change.”⁵⁵ (our emphasis)

The NPPF continues to recognise that the planning system is planned and that therefore, Local Plans, incorporating Neighbourhood Plans, where relevant, are the starting point for the determination of any planning application.

Heritage Assets are defined in the NPPF 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. It includes designated heritage assets and assets identified by the local planning authority (including local listing).”⁵⁶

The NPPF goes on to define a Designated Heritage Asset as a:

“World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under relevant legislation.”⁵⁷

As set out above, significance is also defined as:

“The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting. For World Heritage Sites, the cultural value described within each site’s Statement of Outstanding Universal Value forms part of its significance.”⁵⁸

Section 16 of the NPPF relates to ‘Conserving and enhancing the historic environment’ and states at paragraph 195 that:

⁵⁴ DLUHC, NPPF, para. 11.

⁵⁵ DLUHC, NPPF, para. 11, fn. 7.

⁵⁶ DLUHC, NPPF, p. 67.

⁵⁷ DLUHC, NPPF, p. 66.

⁵⁸ DLUHC, NPPF, pp. 71–72.

“Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset’s conservation and any aspect of the proposal.”⁵⁹

Paragraph 197 goes on to state that:

“In determining planning applications, local planning authorities should take account of:

- a. the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;***
- b. the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and***
- c. the desirability of new development making a positive contribution to local character and distinctiveness.”⁶⁰***

With regard to the impact of proposals on the significance of a heritage asset, paragraphs 199 and 200 are relevant and read as follows:

“When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset’s conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.”⁶¹

“Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a. grade II listed buildings, or grade II registered parks or gardens, should be exceptional;***
- b. assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II* listed buildings, grade I and II* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.”⁶²***

Section b) of paragraph 200, which describes assets of the highest significance, also includes footnote 68 of the NPPF, which states that non-designated heritage assets of archaeological interest

⁵⁹ DLUHC, NPPF, para. 195.

⁶⁰ DLUHC, NPPF, para. 197.

⁶¹ DLUHC, NPPF, para. 199.

⁶² DLUHC, NPPF, para. 200.

which are demonstrably of equivalent significance to Scheduled Monuments should be considered subject to the policies for designated heritage assets.

In the context of the above, it should be noted that paragraph 201 reads as follows:

“Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a. the nature of the heritage asset prevents all reasonable uses of the site; and***
- b. no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and***
- c. conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and***
- d. the harm or loss is outweighed by the benefit of bringing the site back into use.”⁶³***

⁶³ DLUHC, *NPPF*, para. 201.

⁶⁴ DLUHC, *NPPF*, para. 202.

Paragraph 202 goes on to state:

“Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”⁶⁴

With regards to non-designated heritage assets, paragraph 203 of NPPF states that:

“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.”⁶⁵

Overall, the NPPF confirms that the primary objective of development management is to foster the delivery of sustainable development, not to hinder or prevent it. Local Planning Authorities should approach development management decisions positively, looking for solutions rather than problems so that applications can be approved wherever it is practical to do so. Additionally, securing the optimum viable use of sites and achieving public benefits are also key material considerations for application proposals.

National Planning Practice Guidance

The then Department for Communities and Local Government (now the Department for Levelling Up, Housing and Communities

⁶⁵ DLUHC, *NPPF*, para. 203.

(DLUHC)) launched the planning practice guidance web-based resource in March 2014, accompanied by a ministerial statement which confirmed that a number of previous planning practice guidance documents were cancelled.

This also introduced the national Planning Practice Guidance (PPG) which comprised a full and consolidated review of planning practice guidance documents to be read alongside the NPPF.

The PPG has a discrete section on the subject of the Historic Environment, which confirms that the consideration of ‘significance’ in decision taking is important and states:

“Heritage assets may be affected by direct physical change or by change in their setting. Being able to properly assess the nature, extent and importance of the significance of a heritage asset, and the contribution of its setting, is very important to understanding the potential impact and acceptability of development proposals.”⁶⁶

In terms of assessment of substantial harm, the PPG confirms that whether a proposal causes substantial harm will be a judgement for the individual decision taker having regard to the individual circumstances and the policy set out within the NPPF. It goes on to state:

“In general terms, substantial harm is a high test, so it may not arise in many cases. For example, in determining whether works to a listed building constitute substantial harm, an important consideration would be whether the adverse impact

seriously affects a key element of its special architectural or historic interest. It is the degree of harm to the asset’s significance rather than the scale of the development that is to be assessed. The harm may arise from works to the asset or from development within its setting.

While the impact of total destruction is obvious, partial destruction is likely to have a considerable impact but, depending on the circumstances, it may still be less than substantial harm or conceivably not harmful at all, for example, when removing later inappropriate additions to historic buildings which harm their significance. Similarly, works that are moderate or minor in scale are likely to cause less than substantial harm or no harm at all. However, even minor works have the potential to cause substantial harm.”⁶⁷ (our emphasis)

National Design Guide:

Section C2 relates to valuing heritage, local history and culture and states:

“When determining how a site may be developed, it is important to understand the history of how the place has evolved. The local sense of place and identity are shaped by local history, culture and heritage, and how these have influenced the built environment and wider landscape.”⁶⁸

⁶⁶ DLUHC, PPG, paragraph 007, reference ID: 18a-007-20190723.

⁶⁷ DLUHC, PPG, paragraph 018, reference ID: 18a-018-20190723.

⁶⁸ DLUHC, NDG, para. 46.

"Sensitive re-use or adaptation adds to the richness and variety of a scheme and to its diversity of activities and users. It helps to integrate heritage into proposals in an environmentally sustainable way."⁶⁹

It goes on to state that:

"Well-designed places and buildings are influenced positively by:

- ***the history and heritage of the site, its surroundings and the wider area, including cultural influences;***
- ***the significance and setting of heritage assets and any other specific features that merit conserving and enhancing;***
- ***the local vernacular, including historical building typologies such as the terrace, town house, mews, villa or mansion block, the treatment of façades, characteristic materials and details – see Identity.***

Today's new developments extend the history of the context. The best of them will become valued as tomorrow's heritage, representing the architecture and placemaking of the early 21st century."⁷⁰

⁶⁹ DLUHC, NDG, para. 47.

⁷⁰ DLUHC, NDG, paras. 48–49.

Appendix 6: Relevant Development Plan Policies

Planning applications within Ashington are currently considered against the policy and guidance set out within the Horsham District Planning Framework (adopted November 2015) and Ashington Neighbourhood Plan 2019-2031 (adopted May 2021).

Horsham District Planning Framework

Policy 34 pertains to the consideration of 'Cultural and Heritage Assets', and reads as follows:

"The Council recognises that heritage assets are an irreplaceable resource, and as such the Council will sustain and enhance its historic environment through positive management of development affecting heritage assets. Applications for such development will be required to:

1. Make reference to the significance of the asset, including drawing from research and documentation such as the West Sussex Historic Environment Record;

2. Reflect the current best practice guidance produced by English Heritage and Conservation Area Character Statements;

3. Reinforce the special character of the district's historic environment through appropriate siting, scale, form and design; including the use of traditional materials and techniques;

4. Make a positive contribution to the character and distinctiveness of the area, and ensuring that

development in conservation areas is consistent with the special character of those areas;

5. Preserve, and ensure clear legibility of, locally distinctive vernacular building forms and their settings, features, fabric and materials;

6. Secure the viable and sustainable future of heritage assets through continued preservation by uses that are consistent with the significance of the heritage asset;

7. Retain and improves the setting of heritage assets, including views, public rights of way, trees and landscape features, including historic public realm features; and

8. Ensure appropriate archaeological research, investigation, recording and reporting of both above and below-ground archaeology, and retention where required, with any assessment provided as appropriate."

Paragraph 219 of NPPF states that:

"...existing policies should not be considered out-of-date simply because they were adopted or made prior to the publication of this Framework. Due weight should be given to them, according to their degree of consistency with this Framework (the close the

policies in the plan to the policies in the Framework, the greater the weight that may be given).⁷¹

Policy 34 does not make reference to the consideration of heritage harm vs. public benefits, and is thus not compliant with the NPPF. It is therefore concluded that the utilisation of the NPPF is more relevant when considering potential impacts on the historic environment within the Decision-Making process.

Ashington Neighbourhood Plan 2019–2031

The majority of the Site is allocated for development under Policy ASH11 of the Ashington Neighbourhood Plan 2019–2031. The wording of the allocation is discussed in **Section 5**.

⁷¹ MHCLG, *NPPF*, p. 213.



Appendix 7: Relevant List Entries

Roman building 200yds (180m) NW of Spring Copse

Official list entry

Heritage Category: **Scheduled Monument**

List Entry Number: **1005826**

Date first listed: **29-Oct-1973**

Location

The building or site itself may lie within the boundary of more than one authority.

County: **West Sussex**

District: **Horsham (District Authority)**

Parish: **Ashington**

National Grid Reference: **TQ 12492 15698**

Summary

Roman building, 320m south-west of Church Farm House.

Reasons for Designation

Romano-British villas were extensive rural estates at the focus of which were groups of domestic, agricultural and occasionally industrial buildings. The buildings usually include a well-appointed dwelling house, the design of which varies considerably according to the needs, taste and prosperity of the occupier. Most of the houses were partly or wholly stone-built, many with a timber-framed superstructure on masonry footings. Roofs were generally tiled and the house could feature tiled or mosaic floors, underfloor heating, wall plaster, glazed windows and cellars. Many had integral or separate suites of heated baths. The house was usually accompanied by a range of buildings providing accommodation for farm labourers, workshops and storage for agricultural produce. These were arranged around or alongside a courtyard and were surrounded by a complex of paddocks, pens, yards and features such as vegetable plots, granaries, threshing floors, wells and hearths, all approached by tracks leading from the surrounding fields. Villa buildings were constructed throughout the period of Roman occupation and could serve a wide variety of uses alongside agricultural activities, including administrative, recreational and craft functions. The least elaborate villas served as simple farmhouses whilst, for the most complex, the term "palace" is not inappropriate. Villa owners tended to be drawn from a limited elite section of Romano-British society. Although some villas belonged to immigrant Roman officials or entrepreneurs, the majority seem to have been in the hands of wealthy natives with a more-or-less Romanised lifestyle. Roman villa buildings are widespread, with between 400 and 1000 examples recorded nationally. The majority of these are classified as 'minor' villas to distinguish them from 'major' villas. Minor villas are found throughout lowland Britain and occasionally beyond. A significant proportion of the known population are identified as nationally important.

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.

History

See Details.

Details

This record was the subject of a minor enhancement on 6 November 2014. The record has been generated from an "old county number" (OCN) scheduling record. These are monuments that were not reviewed under the Monuments Protection Programme and are some of our oldest designation records.

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

Legacy

The contents of this record have been generated from a legacy data system.

Legacy System number: **WS 410**

Legacy System: **RSM - OCN**

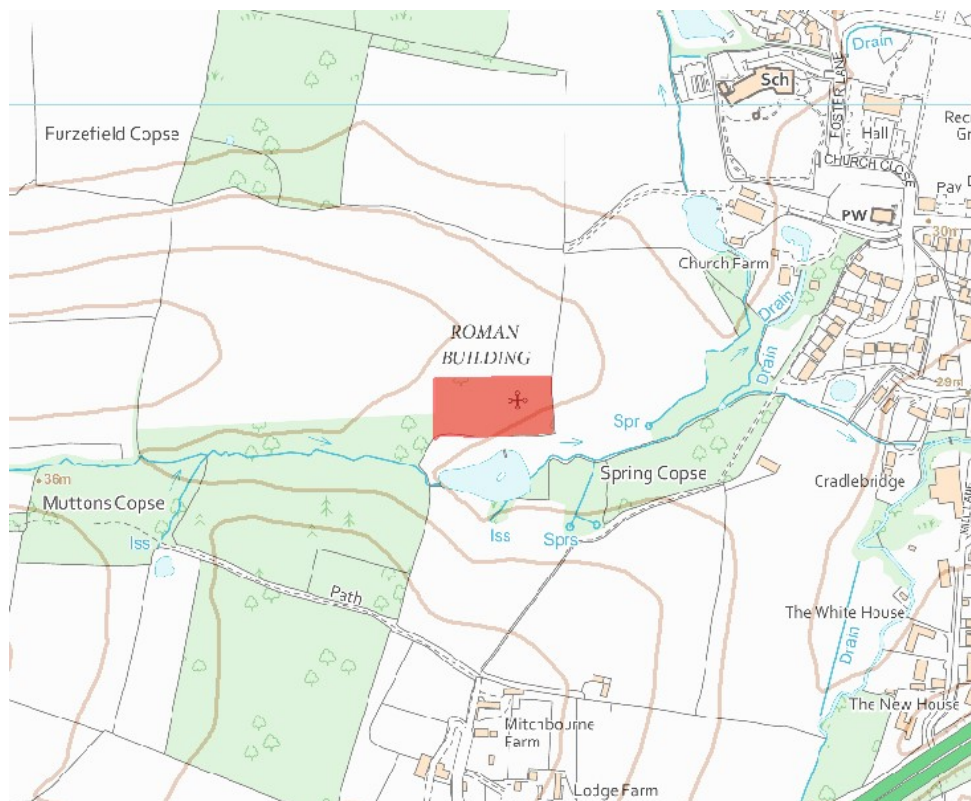
Sources

Other

West Sussex HER 3363 - MWS1290, NMR TQ11NW1, LINEAR 585. PastScape 396205, 1325617.

Legal

This monument is scheduled under the Ancient Monuments and Archaeological Areas Act 1979 as amended as it appears to the Secretary of State to be of national importance. This entry is a copy, the original is held by the Department for Digital, Culture, Media and Sport.



Map

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End of official list entry



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THE PARISH CHURCH OF ST PETER AND ST PAUL

Official list entry

Heritage Category: **Listed Building**

Grade: **II***

List Entry Number: **1027442**

Date first listed: **15-Mar-1955**

Statutory Address 1: **THE PARISH CHURCH OF ST PETER AND ST PAUL, CHURCH LANE**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

[Corrections and minor amendments](https://historicengland.org.uk/listing/the-list/minor-amendments/) (<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

Location

Statutory Address: **THE PARISH CHURCH OF ST PETER AND ST PAUL, CHURCH LANE**

The building or site itself may lie within the boundary of more than one authority.

County: **West Sussex**

District: **Horsham (District Authority)**

Parish: **Ashington**

National Grid Reference: **TQ 12884 15890**

Details

ASHINGTON CHURCH LANE 1. 5404 The Parish Church of St Peter and St Paul TQ 11 NW 7/400 15.3.55

II*

2. Chancel with south chapel, nave with south aisle and porch. C15, restored by Robert Wheeler of Tunbridge Wells in 1872, when the south aisle was added.

Listing NGR: TQ1288415890

Legacy

The contents of this record have been generated from a legacy data system.
Legacy System number: **298290**

Legacy System: **LBS**

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



Map

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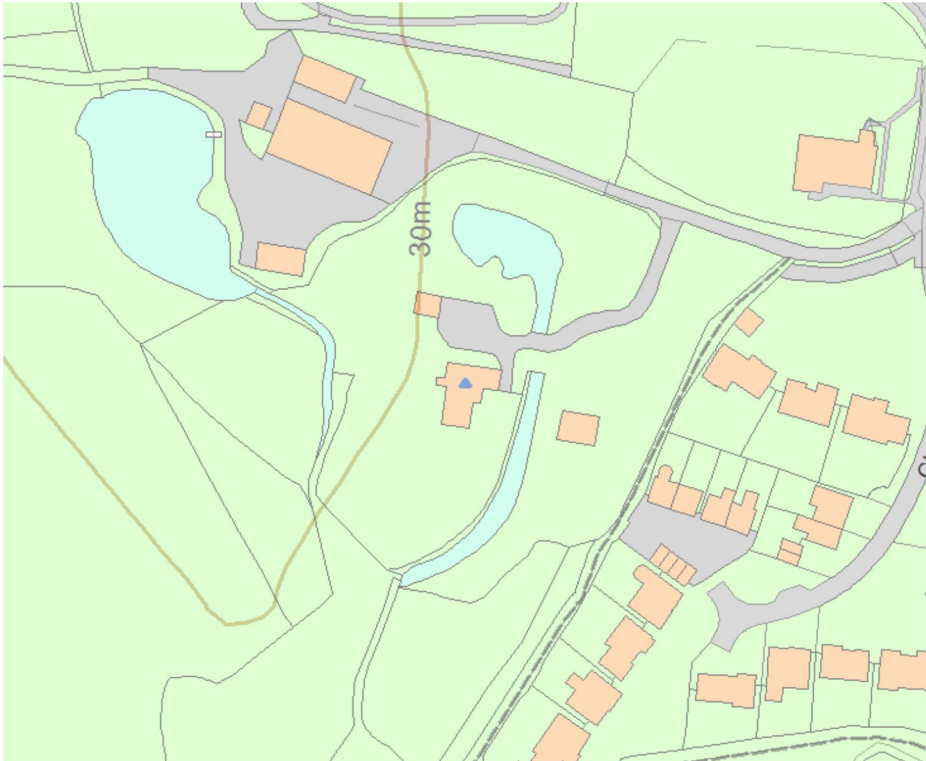
Legacy

The contents of this record have been generated from a legacy data system.
Legacy System number: **298291**

Legacy System: **LBS**

Legal

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as amended for its special architectural or historic interest.



CHURCH FARMHOUSE

Official list entry

Heritage Category: **Listed Building**

Grade: **II**

List Entry Number: **1353978**

Date first listed: **15-Mar-1955**

Statutory Address 1: **CHURCH FARMHOUSE, CHURCH LANE**

This List entry helps identify the building designated at this address for its special architectural or historic interest.

Unless the List entry states otherwise, it includes both the structure itself and any object or structure fixed to it (whether inside or outside) as well as any object or structure within the curtilage of the building.

For these purposes, to be included within the curtilage of the building, the object or structure must have formed part of the land since before 1st July 1948.

[Understanding list entries](https://historicengland.org.uk/listing/the-list/understanding-list-entries/) (<https://historicengland.org.uk/listing/the-list/understanding-list-entries/>)

[Corrections and minor amendments](https://historicengland.org.uk/listing/the-list/minor-amendments/) (<https://historicengland.org.uk/listing/the-list/minor-amendments/>)

Location

Statutory Address: **CHURCH FARMHOUSE, CHURCH LANE**

The building or site itself may lie within the boundary of more than one authority.

County: **West Sussex**

District: **Horsham (District Authority)**

Parish: **Ashington**

National Grid Reference: **TQ1278515831**

Details

1. 5404 TQ 11 NW 7/401 15.3.55

ASHINGTON CHURCH LANE

Church Farmhouse

II

2. C17 or earlier L-shaped timber-framed building with plaster infilling. Horsham slab roof. Casement windows. Two storeys. Three windows.

Map

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End of official list entry



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Planning (Listed Buildings and Conservation Areas) Act 1990
Town & Country Planning Act 1990 (as amended)
Planning and Compulsory Purchase Act 2004

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