



LONDON OFFICE

Ms Nicola Pettifer
Horsham District Council
Parkside
Horsham
West Sussex
RH12 1RL

Direct Dial: 020 7973 36

Our ref: P01559720

18th September 2023

Dear Ms Pettifer

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

**LAND TO THE WEST OF ASHINGTON CofE SCHOOL, PARK LANE,
ASHINGTON, WEST SUSSEX
Application No. DC/23/0406**

Thank you for your letter of 1st September 2023 regarding amendments to the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Background

Historic England provided written advice on 23rd May 2023 on the original scheme for the development of 180 houses, associated open space, sports pitches, landscaping and related infrastructures, on land allocated for 150 dwellings in the made Ashington Neighbourhood Plan.

At that time, we raised concerns about the harm that the proposed sports pitches in the south-eastern section of the site would have caused to the significance of the adjacent Scheduled Monument, comprising the buried remains of a Roman villa sited north-west of Spring Copse (NHLE 1005826). We considered that any development on this area had the potential to disturb below-ground deposits related to the wider archaeological site, which further investigation and interpretation may identify to be of equivalent significance to scheduled monuments.

We noted that although the proposed mitigation measures would have helped reducing potential harm to buried archaeology and to the setting of the Scheduled Monument, the change of character entailed by the development of an area which forms part of a unitary archaeological site would have still disrupted our understanding and appreciation of the heritage asset as a whole.



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Accordingly, we recommended an alternative use of this land as public open space to ensure protection of below-ground heritage and preservation of the physically and conceptually link with the scheduled site.

The original proposals included also upgrading of the existing trackway to form an access to the development site. We considered that this proposal had the potential to harm the significance of the proximate Grade II* listed Parish Church of St Peter and St Paul and its graveyard (NHLE ref. 1027442), as well as the Grade II listed Church Farmhouse (NHLE ref. 1353978) and the associated non-designated moated site, through change of their rural setting. We recommended provision of further information in the form of detailed drawings and verified views for a proper assessment of the level of harm to be made.

Historic England Updated Advice on Amended Scheme

Following our recommendations, the revised scheme has omitted the previously planned sport pitches in the heritage sensitive south-eastern section of the site. This area is now proposed to be used as public open space.

We welcome the new approach as it ensures protection of below-ground archaeology and safeguard of the Scheduled Monument's setting, while also sustaining the appreciation of the wider unitary archaeological site.

With reference to our request for additional information concerning the proposed upgrading of the existing trackway as access to the development site, an annotated layout plan has now been submitted. This illustrates the new section of the proposed road, specifies surfacing materials and indicates that significant historic and landscape features, such as the church wall and mature trees, would be retained (Drawing 3033-APA-ZZ-00-LA-L-1001). We note, however, that no information concerning other relevant design aspects, such as the lighting and signage strategy, has been provided.

We also requested provision of verified views to properly assess the impact of the modified access route and the surrounding development on the setting of the listed buildings. In this respect, the Historic Environment Response by Pegasus Group dated 17th August 2023 stated that a visualisation of the new access route to the site would be submitted in due course. However, we have not located any 3D views among the planning documents submitted to date.

Notwithstanding this, we consider that, overall, the harm to significance caused by the proposals through change of the listed buildings' rural setting would fall within the less-than-substantial spectrum, although the exact level within that range would be difficult to establish at this stage.

We are happy to leave further considerations on this point with your Planning Authority, when additional information is provided. It will be then for your Council to weigh any



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public benefits generated by the proposals against the harm, in accordance with paragraph 202 of the NPPF.

Recommendation

Historic England has no objection to the application on heritage grounds.

We consider that any harm to significance caused by the proposals would be less than substantial. The exact level within that range can be assessed after provision of additional information, as set out in our advice. Accordingly, we leave your Local Planning Authority make this assessment and decide whether the public benefits arising from the scheme are sufficient to outweigh that harm, as required by paragraph 202 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 16(2) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess.

Your authority should take these representations into account in determining the application. If there are any material changes to the proposals, or you would like further advice, please contact us.

Yours sincerely

Luciana Gallo

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