



Historic England

MS. Karen Dare
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c/O Ashington Parish Council
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Our ref: 2020.04.24
Ashington NP
Further
Matters HE
RLS
Comments

Mr. Peter Cleveland
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by email only
CC Norman Kwan HDC, Sarah Nelson SDNPA

24th April 2020

Dear Ms Dare and Mr Cleveland

Ashington Neighbourhood Plan Pre-submission Consultation and Land West of Ashington (Site 5)

Following on from our comments on the Ashington Neighbourhood Plan Pre-submission consultation (forwarded in August 2019), the completion of geophysical survey on the proposed Site 5 and our subsequent telephone conversations with you both, I am writing to confirm Historic England's current view and the options we suggest for consideration for going forward.

In our response to the pre-submission (Regulation 14) public consultation on the plan, we identified that the impact of proposed development Site 5 (Land West of Ashington) appeared not to have taken account of the potential for presence of important archaeological remains suggested by the location of the scheduled Roman villa site directly to the west (List Entry Number 1005826, Scheduled 29.10.1973). We also questioned whether consideration had been given to potential effects on the setting of the non-designated moated site, including the listed farmhouse to the north-east. In a subsequent telephone conversation with Mr Cleveland we confirmed that it was our view that a first step in providing a better understanding of the potential for presence of remains of archaeological interest would be to commission a geophysical survey of the site.



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A geophysical survey has been commissioned by the landowner and undertaken by Sumo Geophysics. We consider this to be a thorough and reliable survey, as far as the techniques of geophysical prospection allow. The report of these works is informative and presents a well-reasoned analysis of the evidence. It was subsequently revealed that a programme of archaeological survey in 1999 had identified that the Roman villa remains extend eastward into the site, along with associated field ditches. We have taken the revised Archaeological desk-based assessment into account in coming to our view. Further research has now revealed that additional geophysical survey was undertaken in 2017 on land directly west of Site 5 and outside the scheduled monument revealing additional areas of archaeological remains that appear to be related to the scheduled site.

In considering the implications of the findings of this survey for the neighbourhood plan and our recommendations we must take into account the legislation relating to scheduled monuments set out in the Ancient Monuments and Archaeological Areas Act 1979, as well as national planning policy and guidance and local plan strategic policy. In particular we have regard to paragraph 11 of the National Planning Policy Framework (NPPF), 'The presumption in favour of sustainable development', with footnote 6. We have also applied Section 16 of the NPPF 'Conserving and Enhancing the Historic Environment', giving attention to paragraphs 193 - 197 and footnote 63, which states that "Non-designated heritage assets of archaeological interest, which are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets."

In assessing the likely significance of the archaeological remains revealed through both the 1999 and more extensive 2017 and 2019 surveys we have regard to our published Scheduling Selection Guide: Settlements to 1500 (published July 2018) <https://historicengland.org.uk/images-books/publications/dssg-settlement-sites-1500/> . Our Introduction to Heritage Assets: Roman Settlements (published October 2018) provides a helpful accompaniment to this <https://historicengland.org.uk/images-books/publications/iha-roman-settlements/heag231-roman-settlement> . With regard to Roman settlement sites, the selection guidance states "Where they retain reasonable archaeological potential, Roman settlement sites will be deemed to have national importance. However, in some areas, both upland and lowland, certain types of settlement are sufficiently common to require discrimination in terms of scheduling recommendations. Again, considerations such as condition, group value and potential will require evaluation."

The South East Research Framework (a collection of documents that are used by the archaeologists of the counties of West and East Sussex, Surrey and Kent) also presents a helpful assessment of the archaeological resource across the region, of which the Resource Assessment and Research Agenda for the Roman Period is of relevance: https://www.kent.gov.uk/__data/assets/pdf_file/0007/99304/The-Roman-Period-Chapter.pdf



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The geophysical survey undertaken in December 2019 has confirmed the presence of buried remains of a substantial masonry structure identified in the south of Site 5 previously observed in 1999 and identified as the continuation of the villa building scheduled in 1973 on land directly to the west. The survey has also revealed the courses of a number of ditches forming possible enclosures, which may be associated with the villa or representing other phases of activity and continuing the area of activity outside the scheduled area west of Site 5. These extend into the north of Site 5 and consist of several linear features that may represent overlapping discrete phases of activity, or a number of contemporary trackways and enclosures. The December 2019 survey revealed remains of a second large rectilinear masonry structure in the east of the site with associated areas of burning. The surveyors have interpreted this as the remains of a detached bathhouse associated with the villa and set near the stream forming the southern boundary of the site. In addition to these substantial responses, the survey also identifies areas of 'possible archaeology'. These range from relatively small areas of just 1 or two metres in diameter to larger 'spreads' of greater than 200m² in extent, which are interpreted as possible remains of further buildings of less substantial construction than the villa and suggested bathhouse. Such groupings of buildings are common features of Roman villas, with the principal building and bathhouse in masonry (or on Masonry footings or dwarf walls) and associated agricultural buildings (particularly barns) constructed in timber.

We note that the geophysical survey results seem to be less clear at the northern edge of the site and there may be less confidence placed in what they suggest may or may not be present.

The structures identified appear to have some relationship with the already scheduled site. The posited bathhouse is a substantial structure, with a spread of material measuring in the area of 40m x 20m. Either as the continuation of a single villa property, or another element of a larger contemporary or 'successor' settlement this would be considered to rate as of national interest and therefore should be considered as such in following the requirements for non-designated archaeological sites of national interest set out in the NPPF. The linear features (possibly ditches and fence lines) and other areas of archaeological potential suggest the presence of a wider area of remains that may all relate to this complex. They represent remains that are often less well preserved than masonry structures. The areas of potential remains represent a particularly important resource for future research. Where these could relate to phases of activity prior or subsequent to the construction of the villa, this might equally be revealing of continuity or changing activity. The linear ditches form a part of this landscape of features and the relationships between them and the buildings or areas of other activity may well be important in understanding the site's past occupation and management. The, proximity of the villa to the medieval moated manorial farmstead, a later centre of estate administration, could be of greater significance, for example, if there is evidence of settlement in the vicinity during the intervening Anglo-Saxon period. There is evidence from elsewhere of the long-lived



survival of villa estates into the medieval period. As such, the wider area of Site 5 would also be regarded as of national interest.

The desk-based assessment concludes that the archaeological activity appears to reduce in the northern half of the site. Whilst there is no evidence of masonry buildings in this area, the presence of linear features and more discrete areas of archaeological potential suggest there is potential for further remains in the centre and north of the site. The arrangement of linear features in the north of the site is particularly complex, and, whilst it might be interpreted as elements of a field system, it might also be interpreted as elements of garden layout. In the absence of further evidence from excavation, these should be considered as a part of the focus of activity around the villa building with potential for further ephemeral remains unlikely to be detected by geophysical survey techniques, particularly given the fall off of the clarity of results in the north of the site. It is, indeed the extent of remains across the site that suggests this is a site of particular interest, possibly representing an important administrative centre for the Weald in the headwaters of the River Adur, rather than necessarily an isolated villa.

At present, given the data presented, we would object strongly to the allocation of this site for development on the basis of the substantial harm that would be likely to occur to the site of archaeological interest. We feel it is unlikely that the development of this land could deliver the substantial public benefits that would be necessary to justify any such harm and that a developer could not avoid this harm or minimise it to an extent that would be justifiable.

Giving consideration to the proposition of developing only the northern half of the site; the evidence presented to us suggests that there are archaeological remains that form a part of the wider complex of remains in the north of the site. These may appear to be less dense in this area, but we also recognise the limitations of the geophysical survey techniques used, which do not reveal all types of archaeological remains equally well or provide a clear understanding of what these features, cumulatively represent. We would not at this point have confidence in the evidence that it could be demonstrated that this area was sufficiently of less archaeological interest than the land to the south to mean that it could be allocated with confidence that further investigation would not result in discovery of remains that would then make delivery of that development unacceptable. Equally, we are not at this point convinced that the loss of the remains in this area as a part of the site as a whole would be more acceptable than loss of the more obvious structures of the 'bathhouse' and 'villa'.

An option that could be considered is for the landowner to commission a further phase of archaeological investigation through excavation of a number of trial trenches to examine the features identified (i.e. to prove or disprove the hypothesis of their identification in the Geophysical Survey report) and test the areas identified as potentially having fewer archaeological remains. There is a risk to the landowner in this approach, that they could commission an expensive programme of



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archaeological investigation only to determine that their land has archaeological interest that would discount it from potential for future development. In the first instance we recommend discussing this option with the District Council's archaeological advisors to agree a 'written scheme of investigation' and sampling strategy. This is the same process that would be expected to inform consideration of land for allocation through a local plan and would be the normal next step to test the findings of a geophysical survey with a sampling approach that reflects the survey findings. In this case the geophysical survey has provided strong results that could make a sampling strategy particularly focused - i.e. fewer trenches are required as known features and suggested 'blank' areas can be accurately targeted.

Another option that we have discussed would be to consider an alternative use for this land to be secured through the neighbourhood plan. The site is now understood to contain at least some archaeological remains of national interest with potential for this to include remains across the majority of the land. The future conservation of these remains and their availability for research depend on the presence of a benevolent management regime and would be enhanced by the availability of some public access. Securing the use of the land as public open space with an agreed management plan as part of the NDP may be considered a considerable public benefit. We have discussed, albeit briefly, whether this might be achieved through a land exchange with the owners of Site 6, whereby Site 5 delivers a part of the public open space requirement for Site 6, allowing a larger allocation within site 6. This option would also preserve the open landscape setting of the moated site and listed farmhouse that reflect the historic positioning of these structure in an open, agricultural landscape that has been lost through development of land further east. In time this may provide opportunities for the people of Ashington to investigate, explore and enjoy these substantial buildings. However, it must be born in mind that potential for landscaping of such an area of public open space would be limited by the sensitivity of the archaeological remains beneath it.

I hope these comments are of assistance in considering how to proceed with the neighbourhood plan and advising your client on any next steps they may wish to make.

I remain your servant

Robert Lloyd-Sweet



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