

Historic England

Simon Davis
Principal Planning Officer
Arun District Council
Planning Team
Arun Civic Centre
Maltravers Road
Littlehampton
BN17 5LF

Our ref: P01172204

3 April 2020

Dear Mr Davis

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

**CHURCH NORTON SPIT, PAGHAM BEACH, PAGHAM PO21 4NJ
Application No. P/12/20/DOC Approval of Details.**

Thank you for your letter regarding the above application for planning permission. We previously provided advice to your council, to Chichester District Council, and the Marine Management Organisation regarding the application to which this condition discharge relates (P/97/15/PL). We have reviewed the new information available and provide the following advice to assist your authority in determining the application. We would also expect to provide comparable advice on this application to Chichester District Council and the MMO.

Historic England Advice

The proposal is for a managed breach of the shingle spit at the mouth of Pagham Harbour. This shoreline adjustment aims to alter the coastline towards a more sustainable morphology and address the coastal erosion concerns presently experienced along the adjacent Pagham Beach. The scheme has been granted planning consent subject to approval of details reserved by conditions.

We previously advised that if the application was approved, that an archaeological condition should be applied, requiring the applicant to provide a written scheme of investigation (WSI) for archaeological works. This recommendation has been applied to the planning consent as condition 4 (programme of archaeological investigation and mitigation), and we therefore provide advice in relation to this condition.

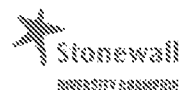
Our advice is based on the understanding that:

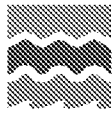
- The area originally proposed for a temporary causeway has now been filled with naturally breached shingle and no sheet piling here will therefore be required.
- The spit has breached naturally but some manipulation will still be necessary in order to create the proposed morphology and procure a sufficient quality of shingle for creation of the tern island.



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- That a channel cut is no longer necessary for creation of the tern island; this will be created by banking up shingle sourced from the breached spit.

The applicant has submitted a WSI which includes archaeological recording of a WWII concrete structure (ahead of tern island creation), undertaking monitoring of all phases of works associated with the movement and translocation of shingle (from the breach area to the new island), and recording any surface/near surface archaeological deposits that may be impacted during engineering works.

We think that the processes outlined in the WSI for recording of the WWII structure are suitable, but we have concerns regarding the detail of the WSI in relation to the shingle movement and redistribution (and any related works), and the practicalities of how archaeological recording and monitoring of this work would take place.

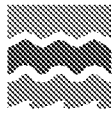
Section 3.3 of the WSI is not clear what exactly the key stages of engineering works are and what monitoring will be undertaken in relation to these, and 3.3.2 and 3.4.4 do not outline clearly what recording will be undertaken, and what the methods of working will be. The WSI outlines a very general approach, and one that might be achievable in a terrestrial (land based) archaeological context, but which may prove very difficult to apply in an intertidal context. In this respect the WSI refers to the Sussex guidelines for archaeological work, but does not additionally utilise protocols for recording archaeology relating to marine aggregate deposits or marine contexts. In reference to 3.3.2 and 4.7, reports should also be submitted to Historic England and OASIS.

Next Steps

It is important that the WSI can clearly respond to the engineering and construction works that will take place, so we recommend that a detailed construction methodology is provided to the archaeological consultant. This will mean that key construction stages can be identified, and appropriate and achievable archaeological recording or monitoring techniques can then be allocated to each stage of works. The detail of exactly how these works will be undertaken, and when they would be applied, then needs to be described fully in the WSI.

It would be usual for this scale of project to have the input of a marine archaeologist in both creating the WSI and potentially in undertaking monitoring works. A marine archaeologist will have experience of designing and undertaking archaeological works in the marine environment. The Marine Aggregate Industry Protocol (for reporting finds of archaeological interest) would be a useful reference for methods that may apply to this project, however a tailored approach will be required and should be clearly outlined in the WSI. A recording protocol for the shingle movement works is likely to be more practically achievable than in situ recording of deposits or artefacts in the breach area, though provision needs to be made for all such circumstances, and opportunities for additional recording may be available. Information on the marine aggregate protocol and relevant guidance note can be found at:





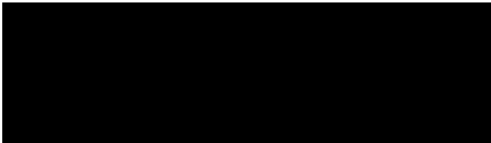
<https://www.wessexarch.co.uk/our-work/marine-aggregate-industry-protocol-reporting-finds-archaeological-interest>

We note that the MMO licence for this scheme (Licence no. L/2017/00317/1) also requires a pre-works condition (no. 5.2.4) for submission of a method statement and WSI at least 4 weeks before works on site commence. The applicant should therefore ensure that an updated WSI is supplied to the MMO, as well as Arun and Chichester in due course. We would be able to discuss these matters further, or comment on an amended WSI ahead of formal submission to the relevant authorities, if this is helpful for the applicant.

Recommendation

It is our view that the submitted WSI does not fulfil the requirement of condition 4 of the consented application. We recommend that an amended WSI for archaeological monitoring and recording works should be submitted for approval, taking into account the advice we have provided above.

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



Rebecca Lambert MSc AIfA
Inspector of Ancient Monuments

