

Historic England

SOUTH EAST OFFICE

Mr Simon Davis
Arun District Council

Our ref: P00493396
25 January 2016

Dear Mr Davis

**Arrangements for Handling Heritage Applications Direction 2015 &
T&CP (Development Management Procedure) (England) Order 2015**

**CHURCH NORTON SPIT, PAGHAM BEACH, PAGHAM PO21 4NJ
Application No P/97/15/PL**

Thank you for your letter of 4 January 2016 notifying Historic England of the above application. We provided advice on the heritage implications of the proposals to the Marine Management Organisation on 27 November 2015, and provide the following advice in conjunction with the comments provided to the MMO. We will also be providing comparable advice on this application to Chichester District Council.

Summary

We have reviewed the information provided to us with this application, regarding the managed breach of the shingle spit at Pagham Harbour, and note that the proposed development has the potential to cause harm to undesignated heritage assets, as although the initial breaching of the spit is unlikely to affect archaeological deposits, there are a range of other potential effects that may negatively impact upon as yet unknown undesignated heritage assets. We understand, however, the importance of the scheme for protection of a significant number of properties and do not therefore object in principle to the scheme, but recommend that assessment of the significance of the historic environment and potential impacts upon it should take place. This work can be undertaken as a separate assessment to the EIA, with any investigation and mitigation secured by planning condition, and/or conditions placed on the MMO licencing. Recommendations for an appropriate condition are provided, but consultation should also take place with the Chichester Archaeological Officer.

Historic England Advice

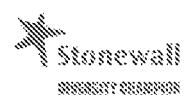
Significance

Pagham Harbour was once part of a sea channel that separated Medmerry and Selsey from the mainland, and consequently the likelihood for discovery of boats, moorings, quays, platforms, fishtraps and other riverside structures in the area, from prehistoric time onwards is likely to be significant. The previous historical and morphological characteristics of Pagham harbour would have been an important

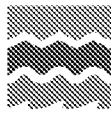


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aspect in the siting of the Norman castle at Church Norton and the Roman tide mill at Sidlesham, and the identification of any associated landscape features or deposits relating to these sites, would be of considerable importance.

Recent archaeological fieldwork at Medmerry and the Manhood Peninsula, undertaken as part of the Medmerry re-alignment scheme, has identified a significant range of prehistoric and medieval archaeological features and deposits, and the area forming Pagham Harbour should therefore be seen as having increased archaeological potential in light of these discoveries. Pleistocene channels have also been recorded elsewhere off the coast of Selsey, and though these generally occur at some depth, they may be impacted by coastal change and scouring effects.

A scan of publicly available records indicates the position of a shipwreck in the general vicinity of the Pagham spit. Its exact location is not known as the information regarding its position has been sourced from documentary records, however there is potential for remains of this wreck, and other previously unidentified marine heritage assets, to be located within the development area.

Impact

The proposed development has four key areas of impact which can be defined as; breaching of the shingle spit, construction of a temporary access causeway, habitat creation, and secondary impacts such as increased water flow and scouring.

The ES Table 5.2 'Environmental topics scoped out of the assessment' notes that archaeology was scoped out of the EIA because: *"This project will not cause any significant changes to features of archaeological or cultural heritage value because the spit is recently formed morphological feature and the breach will be created in an area where the tidal inlet entrance was previously positioned (in 2003)."*

We are in agreement that the spit itself is most certainly recent and the direct impact of the breach is going to initially be through recently deposited gravels to low tide level (-1.8m OD), however, we note that once the breach has been completed it is expected to 'evolve' and deepen. It is not clear how much the breach is expected to deepen, however it is possible that as it does so, scouring may occur of more deeply stratified deposits.

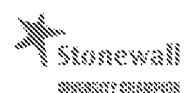
Creation of the breach will change the morphology of the coast, potentially creating changes in water flow, scouring, and deposition patterns to the north of the spit within the channel and harbour. We would expect that some secondary effects may occur from scouring of reformed tidal creeks through the harbour, and that this could have a negative impact on any stratified archaeological or geoarchaeological deposits.

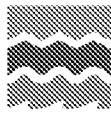
Creation of the temporary access causeway will entail the insertion of a driven sheet pile wall. Whilst this will be a temporary structure, its insertion has the potential to cause harm to any undesignated marine heritage assets (note the possible location of



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at least one shipwreck in this area), or to stratified deposits, dependant on its construction depth.

The ES also mentions the creation of a new island for Little Terns (as compensation for possible loss of habitat). This will be in the area of a concrete structure (EIA 11.2.2, p 249), which will be covered with shingle from the breach to protect the structure, and will be cut off from the spit by a channel, which will isolate the new island from predation. No information has been supplied indicating what the concrete structure is, but we note that concrete structures are often heritage assets linked to military defence of the coastline, particularly during WWII. Creation of a channel might also impact on harbour deposits of as yet uncertain archaeological potential.

Policy

The National Planning Policy Framework All of the NPPF policies together constitute Governments view of what sustainable development means in practice, so development must meet all of the policies in order to be sustainable.

In determining applications, local planning authorities should *require an applicant to describe the significance of any heritage assets affected*. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. *As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary*. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should *require developers to submit an appropriate desk-based assessment*, and where necessary, a field evaluation (para 128).

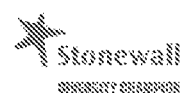
Para 129 states that Local planning authorities should *identify and assess the particular significance of any heritage asset that may be affected* by a proposal taking account of the available evidence and any necessary expertise. They should take this assessment into account when considering the impact of a proposal on a heritage asset, to *avoid or minimise conflict* between the heritage asset's conservation and any aspect of the proposal.

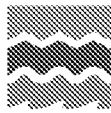
It is also made clear in para 141 that Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. *They should also require developers to record and advance understanding of the significance of any heritage assets to be lost* (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.



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Assessment

It is clear from reviewing the available data that the proposed development has the potential to cause harm to undesignated heritage assets, as although the initial breaching of the spit is unlikely to affect archaeological deposits, there are a range of other potential effects that may negatively impact upon as yet unknown undesignated heritage assets. We understand, however, the importance of the scheme for protection of a significant number of properties and do not therefore object in principle to the scheme, but recommend that assessment of the significance of the historic environment and potential impacts upon it should take place. This would ideally have formed a part of the EIA, however it would be possible to now undertake this work as a separate assessment, with any investigation and mitigation secured by planning condition, and/or conditions placed on the MMO licencing.

We think it essential that a desk based heritage assessment is produced in order to fully understand the heritage significance of the development area, including the deeper levels of the breach site, within the channel, and within the harbour area, and to identify the potential impacts of development on the heritage resource. The desk based exercise should examine available archaeological, geoarchaeological and marine geophysics data. Following this assessment, it is likely that further investigation will be required, and the details of such a program of work should be formulated in consultation with Historic England and the Chichester Archaeological Officer.

We think it would be beneficial for a small number of geoarchaeological boreholes to be drilled on the drier ground within the harbour area, to assess the nature of the harbour deposits and their likely archaeological potential. The channel area where the sheet pile wall will be situated may require exploratory fieldwork or survey to establish the presence or absence of marine heritage assets. The area designated for the Tern island will need to be investigated to see if the concrete structure is of heritage significance, and the potential for discovery of deposits in the proposed channel area adjacent to the island, will also need to be established.

If heritage assets are identified that will be impacted by any aspect of the development, then mitigation will be required. This may extend to preservation by design, thus preserving heritage assets in situ, undertaking sampling, or systematically recording heritage assets, deposits, or artefacts affected by the development. Historic England and the Chichester Archaeological Officer will need to be satisfied that adequate provision is being made for the investigation, recording and mitigation of any identified heritage assets within the development area, with a proposed program of work to include desk based assessment, field investigation and mitigation.

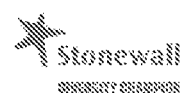
Recommendation

Because the proposed works have the potential to cause harm to heritage assets, Historic England recommends that planning consent could be granted for the scheme but that this should include conditions to secure a suitable program of investigation,

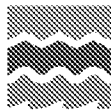


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recording and mitigation works for the historic environment.

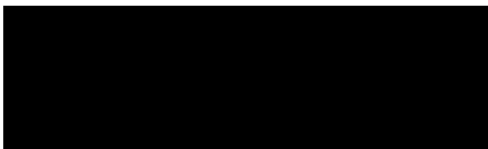
We have provided a version of the following condition to the MMO, and recommend this condition could also be applied to any other permission that is granted in respect of this application:

[1] No development shall take place until the developer has produced a desk based assessment detailing the heritage significance of the development area and potential impacts of development on the historic environment, and following this; has secured the implementation of a program of archaeological investigation and mitigation (to include terrestrial archaeological, geoarchaeological, and marine field archaeological work as appropriate), undertaken in accordance with a Written Scheme of Investigation, which has been submitted to and approved in writing by the Local Planning Authority as advised by Historic England and the Chichester Archaeological Officer.

Reason: To ensure that the archaeological and historical interest of the development site is safeguarded and recorded, to comply with the National Planning Policy Framework.

In furtherance of these recommendations we shall be able to advise the applicant on how best they can fulfil any archaeological conditions applied.

We would welcome the opportunity of advising further. Please consult us again if any additional information or amendments are submitted. If, notwithstanding our advice, you propose to approve the scheme in its present form, please advise us of the date of the committee and send us a copy of your report at the earliest opportunity.



Rebecca Lambert

Assistant Inspector of Ancient Monuments

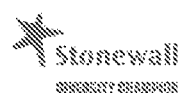


cc James Kenny, Chichester and Arun Archaeological Officer



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