

Historic England

SOUTH EAST OFFICE

Mr Simon Davis
Arun District Council

Our ref: P00493396
23 June 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**

We have received amended proposals for the above scheme. We previously provided advice to your council, to Chichester District Council, and the Marine Management Organisation regarding this application, advising that the applicant should provide an assessment of significance of the historic environment and potential impacts upon it. We have reviewed the new information available and provide the following further advice. We will also be providing comparable advice on this application to Chichester District Council.

Summary

We have reviewed the amended information provided to us as part of this application ('Managed Breach of Shingle Spit at Pagham Harbour; further information for planning application and marine licence'; ABPmer May 2016), and think that the development has the potential to cause harm to undesignated and previously unidentified heritage assets, in particular during construction of a Little Tern habitat and an access causeway. It will therefore be necessary to undertake further investigation and field survey in order to ensure that the archaeological and historical interest of the development site is safeguarded and recorded, to comply with the National Planning Policy Framework. 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, recording and mitigation works for the historic environment.

Historic England Advice

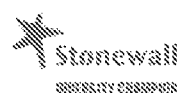
Significance

In our previous advice we raised concerns that the development had the potential to cause harm to undesignated heritage assets. We therefore recommended the applicant commission a desk based heritage assessment in order to fully understand the heritage significance of the development area. We recommended the desk based exercise should examine available archaeological, geoarchaeological, and marine

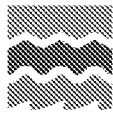


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geophysics data. The applicant has now produced a document providing further information in the form of an archaeological desk based assessment and archaeological information chapter (chapter 4 and Appendix B of 'Managed Breach of Shingle Spit at Pagham Harbour; further information for planning application and marine licence'; ABPmer May 2016).

The archaeological assessment has shown that there is a significant amount of evidence for Bronze Age, Roman and medieval activity in the area surrounding Pagham. The Harbour itself was a Roman seaport, and from this period onwards was subject to successive phases of land claim intensifying in the medieval period. Evidence of settlement activity from multiple historic periods can therefore be expected. In addition there are records of maritime and aviation losses at Pagham, the exact locations of which are as yet unidentified.

Collectively this information indicates that there is significant potential for the discovery of archaeological, geoarchaeological, and maritime artefacts and deposits to be encountered within and around the harbour. Despite this potential, the desk based assessment indicates that there has been little previous archaeological investigation work within the harbour.

Impact

In our previous advice we identified four key areas of impact from the development which could 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.

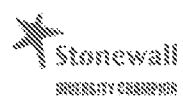
The archaeological assessment has confirmed the recent nature of the beach deposits in the area of the breach and the shifting nature of the opening to the harbour in the past, meaning it is unlikely that there will be any prehistoric or historic evidence preserved here, particularly within the c -2m OD depth of the proposed breach, but also as the breach evolves and deepens. We also note the natural breach and coastal change that has occurred since we provided our previous advice, and agree with the applicant that it is unlikely that artificial breaching of the spit will impact upon stratified archaeological deposits. We note however the potential for the discovery of re-worked archaeological finds during shingle movement.

The creation of a Tern Island requires the burial of a concrete structure, identified as part of a 1930's sea defence, and excavation of a 20m wide channel to a depth of 3.5m to isolate the island from predation. The concrete structure is of limited local historic significance, and will be preserved in situ by burial under shingle. In section 4.2.4 of the submitted document, it is noted that cutting the channel would primarily affect estuarine mud and shingle of early 20th century date, and that a field drain also will have caused disturbance here. We think it is possible that this area has the potential to contain deposits of archaeological interest. This is because no archaeological survey has taken place previously in this area, the exact depths and

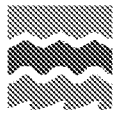


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nature of deposits in this area are likely to be variable, and disturbance from the field drain may not be extensive throughout the deposit sequence. We therefore think that excavation of the trench has the potential to cause harm to archaeological deposits.

For the construction of the breach it will be necessary to infill the existing inlet and create a temporary access causeway. The causeway may need to be created by insertion of a driven sheet pile wall; section 4.2.2 of the report indicates the final construction methodology is still underway for this element of the scheme.

Section 4.2.2 of the supporting document suggests that although sheet piling could conceivably affect previously undisturbed deposits, this is highly unlikely given that no archaeology has been exposed, but yet it also notes that encountering riverside maritime finds, or wreck losses in this area cannot be discounted. We do not think the lack of previous recognition or recording of archaeological deposits or artefacts in this area is an indication of low potential for discovery. It is more likely that a lack of archaeological observation and recording in this area has simply resulted in poor data, given that Pagham has never been subject to detailed archaeological assessment. We think that driving of sheet piles therefore has the potential to cause harm to undesignated marine heritage assets and archaeological deposits. We agree that infill itself is unlikely to cause harm to buried archaeological deposits, but it could cause harm to marine heritage assets such as unidentified wrecks.

With regard to secondary impacts, the applicant has identified that there will only be a temporary reduction in water levels or flow energies during construction, and that there will be a slight reduction in flow speeds within the harbour post-breach, and with the concentration of any changes in both instances close to the harbour entrance. We are therefore in agreement with the applicant that there is unlikely to be any significant impact to archaeological deposits from these effects. There will be continuing changes in the future to site morphology, however these changes are unlikely to be greater than those which are currently occurring as a result of natural coastal formation.

Policy

The National Planning Policy Framework

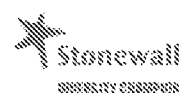
All of the NPPF policies together constitute Governments view of what sustainable development means in practice, so development must meet all of the policies in order to be sustainable.

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.

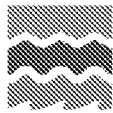


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Para 141 indicates that Local planning authorities should make information about the significance of the historic environment gathered as part of plan-making or development management publicly accessible. *They should also require developers to record 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.

Assessment

Our review of the additional information provided by the applicant indicates that the proposed development has the potential to cause harm to undesignated heritage assets, primarily through excavation of a channel to create a habitat Island for Little Tern, and through the creation of an access causeway. We do not therefore agree with the general statement made in the executive summary of the supporting document (pg v) that there will be no significant impact to features of archaeological interest.

We understand the importance of the scheme for protection of a significant number of properties and do not therefore object to the scheme, but advise that further field investigation will be required, and the details of this program of work should be formulated in consultation with Historic England and the Chichester Archaeological Officer.

The applicant has noted the potential for discovery of unstratified archaeological finds within the shingle of the breach area, and suggests that the relevant council officer be informed of any discoveries. A more formal arrangement will be necessary, and an agreed finds reporting protocol will need to be secured as part of any program of works.

It will be necessary to understand more fully the nature of the deposits within the area of the channel for the Tern Island, to establish the archaeological potential and significance of the deposits surviving in the harbour. We therefore suggest that a series of boreholes are undertaken in this area to provide further detail of the deposit sequence in this area. It may also assist interpretation to undertake some supporting samples on the drier ground within the harbour. Based on the results of this investigation it may then be necessary to undertake further investigation or mitigation works ahead of, or as part of, construction of the channel.

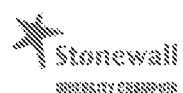
The concrete structure that will form the Tern Island is part of the 1930's flood defences, and we suggest that a location plan and photographic record of any visible elements of the structure before burial would suffice.

It will be necessary to further investigate the area of the proposed causeway, to establish whether there may be any marine heritage assets and archaeological

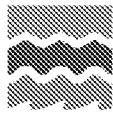


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deposits in this area that could be impacted by the infill or sheet piling. Geophysical survey is a practical and rapid method of identifying any potential marine heritage assets, such as previously unidentified wreck sites, and also former channels where there may be increased potential for archaeological deposits. Section 1.5.5 of the supporting document notes that a series of surveys have already taken place including LiDAR, laser scanning, and bathymetric survey. These techniques can be invaluable for identifying the above types of features. We therefore suggest that archaeological and geoarchaeological analysis is undertaken of existing geophysical survey data. Following this analysis we recommend that a series of targeted boreholes should be undertaken to provide supporting data regarding the deposit sequence in this area. If heritage assets in this area are identified that will be impacted by the causeway creation, then further investigation or mitigation may be required.

Mitigation works of the channel and causeway creation may include preservation by design thus preserving heritage assets in situ, undertaking further 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 geophysical data analysis, borehole survey, and potentially further 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, recording and mitigation works for the historic environment.

We have previously provided a version of the following condition to the MMO, and to you and Chichester District Council, and recommend this updated condition could be applied to any permission that is granted in respect of this application:

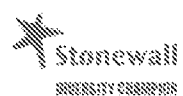
[1] No development shall take place until the developer has secured the implementation of a program of archaeological investigation and mitigation (to include terrestrial archaeological, geoarchaeological, and marine field archaeological work as appropriate), undertaken in accordance with a Written Scheme 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.

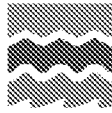


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In furtherance of these recommendations we shall be able to advise the applicant on how best they can fulfil any archaeological conditions applied.

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.

Yours sincerely



Rebecca Lambert

Inspector/Assistant Inspector of Ancient Monuments

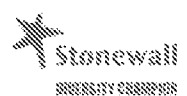


cc James Kenny, Chichester and Arun Archaeological Officer



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