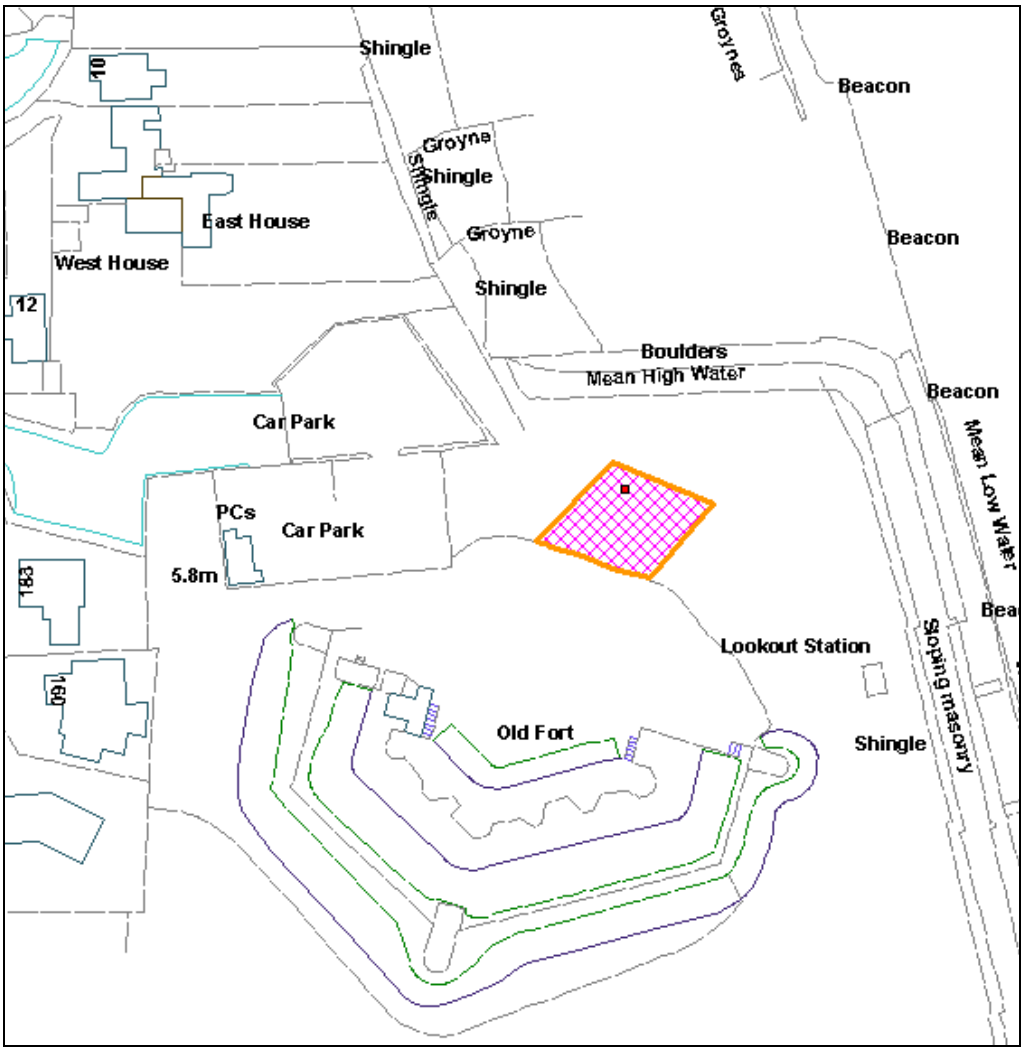
Application Number: AWDM/0567/19 **Recommendation – APPROVE**

Site: **Land North Of Shoreham Fort, Forthaven, Shoreham-By-Sea**

Proposal: **Creation of WWI memorial training trench on land adjacent to Shoreham Fort.**

Applicant:	Shoreham Port Authority	Ward:	Marine
Case Officer:	Peter Barnett		



Not to Scale

Reproduced from OS Mapping with the permission of HMSO © Crown Copyright Licence number LA100024321

Proposal, Site and Surroundings

This application site comprises an area of vegetated shingle on land to the north of the Old Fort near the entrance to Shoreham Harbour. The Fort is a Scheduled Ancient Monument and the site is within a Local Wildlife Site but outside of the Shoreham Beach Local Nature Reserve.

It is proposed to construct a raised trench as a memorial to World War One. Shoreham was the venue for one of the largest training camps for soldiers preparing to join the front line during the First World War. The trench will not be dug into the ground but will be raised above ground level with bunds on both sides. It is to be constructed by scraping the site to level the beach in order to provide a flat base. Gabion baskets will then be positioned along the line of the trench with concrete filled sandbags along the top of the trench. The bunds will then slope down to ground level. The area will be made wheelchair accessible.

The trench will be between 1.8m and 2.8m wide. It will not run in a straight line and will be approximately 26m long. It will be 1.5m high on the south side and 1m high on the north side.

It is to be used as an educational asset and memorial to the many men who trained in Shoreham before going to fight in France. The wish of the Friends of Shoreham Fort is to make the Fort a community and educational asset and the proposed trench, together with the Nissen hut already present on the site, will “advance the education of the public in the history and heritage of the fort.”

A preliminary ecological appraisal has been submitted which identifies highly specialised and rare shingle flora within the area. It advises that the area has been damaged and disturbed during recent flood defence works and that scrub is encroaching into the area. None of the rarer shingle vegetation species are present on the site.

The proposal will result in the loss of 0.07ha of shingle habitat but none of the rarer shingle vegetation species have been found to be present on the site. The proposed development will not impact the integrity of the local wildlife site or the species and habitats for which it has been designed. The new bunds will increase the biodiversity of the area. The development will not impact on reptiles in the area.

Relevant Planning History

AWDM/0566/19 - Application for permanent permission of WWII style Nissen hut and food hut to be used as education facility in connection with Scheduled Ancient Monument (previously approved for a 5 year temporary period under AWDM/1560/14) - approved

Consultations

West Sussex County Council: The County ***Archaeologist*** has no objection. Comments that the proposed memorial trench footprint is located about 7 metres outside the boundary of the Shoreham Fort Scheduled Ancient Monument. The ground works for creation of the trench would not have any direct impact upon any part of the Fort, built in 1857.

The trench footprint, situated almost wholly on ground eroded by the sea after the Fort was built, is very unlikely to contain any presently unknown archaeological features. The intended method of construction, involving ground raising, would cause only very shallow excavations, expected to have no archaeological impact.

The proposals should have very little impact upon the setting of the Scheduled Monument, because of the lie of the ground, which would not block views of the Harbour from the Fort. Views between the Fort and the clearly visible near-contemporary (1842) heritage asset within the Fort's original landscape view envelope, Shoreham Lighthouse, also would not be blocked.

To summarise, the proposals are not expected to involve any direct or indirect archaeological impact.

Adur & Worthing Councils: The Parks and Foreshore Manager advises that the project and related activities connected to the historical recreation would be a great asset to the location and really add historical value and a shared experience with visitors.

Expresses concern however re. the designations of the area and the maps do not clearly set out where the work would be to know if there were 100% direct impacts.

There would need to be clearer plans and if there were suggested works that fell within the designated wildlife area, there would need to be associated consultants, ecologists and plans draw up before we should consider approval.

Further comments following receipt of additional/amendedinformation: to be reported

Historic England: No wish to comment

Natural England: No objection. The proposed development will not have significant adverse impacts on statutorily protected nature conservation sites.

Sussex Wildlife Trust: Original Comments: Whilst SWT is not opposed to the idea of a memorial trench and congratulate the Friends of Shoreham Fort on their fundraising achievements, we are concerned that no ecological information has been submitted with the application.

The proposed location of the trench appears to be within a shingle area of the Shoreham Beach Local Wildlife Site (LWS), which according to our desktop records, contains vegetated shingle priority habitat. It is not completely clear from the Supporting Statement how the trench will be constructed, but the diagram on page 9 indicates that the trench will be built up using spoil with grass seeded over.

Policy 31 of the Adur Local Plan states that all development should ensure the protection, conservation, and where possible, enhancement of biodiversity, including nationally and locally designated sites. Given this, we ask Adur District Council (ADC) to request that information is submitted to demonstrate how the proposal has been designed to avoid adverse impacts on the LWS and other biodiversity features.

Any reports submitted should be produced by a qualified ecologist and be in line with best practice guidelines. These should also make clear how the proposal results in net gains to biodiversity as per the requirements of paragraph 170 of the National Planning Policy Framework. SWT would be particularly concerned by any loss of vegetated shingle. This habitat is listed under section 41 of the NERC Act 2006 and therefore should be treated as a material consideration by ADC.

SWT would like to be consulted again if any additional information is supplied by the applicants. If ecological information is not forthcoming, then the application should be refused.

Second Response following receipt of ecological appraisal and updated Construction Method Plan: I have looked at the amended Construction Method and acknowledge the changes made to take into consideration the Local Wildlife Site (LWS) and the vegetated shingle habitat the site is designated for. We are supportive of the amendments to 4a, 4b and 6a, which now acknowledge the Local Wildlife Site and the need to ensure construction methodologies recognise the importance of avoiding compaction to areas of vegetated shingle habitat.

During our onsite meeting I was pleased to have the discussion to ensure that the use of top soil and grass seed on the banks of the trench will be avoided. We are pleased that the construction methodology now includes a section on net gain for biodiversity, to ensure that the application recognises the requirements of section 170 of the NPPF (2019).

I would perhaps suggest referring to native vegetation as “vegetated shingle species” and the beach area as the “LWS” in section 7

The Sussex Wildlife Trust does not support the development of Local Wildlife Sites but we do recognise the complexities of this application given the dual designation on the site. We hope that the recommendations/amendments made can ensure the aspirations of the heritage designation and the clear need to protect the LWS are achieved if the application is approved.

One last point we would like to highlight is that the Councils own Parks Manager raised concerns about the lack of environmental information with the application. We therefore assume that they have been consulted on the amended information and their comments have been taken on board.

Representations

11 letters of objection received on the following grounds:

- No account has been taken of the impact of the development upon flora and fauna, including lizards, slow worms and insect life
- Rare habitat on the beach is more important than a concrete development to remember the past
- Loss of vegetated shingle
- Trench would be a safety hazard unless fenced in
- Any fencing would restrict public access to an area where there is an established right to roam
- A fenced development would be unsightly
- A WW1 trench has no connection with the fort
- There has never been a trench or combat here
- Gradual militarisation of the fort – it is becoming a military museum that glamourises war
- Trench is well beyond the existing fort boundary and unreasonably encroaches upon an area widely used by the public for other activities
- Loss of wild space
- There is a climate emergency – to survive we must protect natural wildlife as much as possible
- Leave remaining green space well alone
- Unnecessary
- Will have no employment, community or economic benefit

25 letters of support received:

- Great addition to the ongoing restoration and maintenance of one of Shoreham's greatest treasures
- Educational asset and beneficial to the community
- Highlights importance of this protected heritage site
- Fantastic way to show respect and acknowledge impact that the War had on many local families
- Friends of Shoreham Fort do an amazing amount of work to enable the Fort to be protected for future generations
- Wonderful example of community partnership
- Vital to local economy – will attract visitors from outside of the District
- Does not affect ecology on the beach
- Proposed location for trench is not well used

- Trench is a reality of the horrors of the war and does not glamourise it
- Positive use of the site is likely to reduce crime in the area
- Fort has strong links with both world wars
- This has lottery heritage fund backing
- Will not restrict access
- Will not affect Local Nature Reserve

Shoreham Beach Residents Association, via Cllr Loader:

- Satisfied that this is acceptable in conservation terms
- Trench is well outside the perimeter of the Ancient Scheduled Monument
- Will be built on shingle

Letter of support from Cllr Kennard: This is a very important project and the Friends of Shoreham Fort should be supported for the work they have done to preserve, enhance and protect this site for the community

Relevant Planning Policies and Guidance

Adur Local Plan 2017 Policies 2, 8, 30, 31, 32
National Planning Policy Framework (February 2019)

Relevant Legislation

The Committee should consider the planning application in accordance with:
Section 70 of the Town and Country Planning Act 1990 (as amended) that provides the application may be granted either unconditionally or subject to relevant conditions, or refused. Regard shall be given to relevant development plan policies, any relevant local finance considerations, and other material considerations; and
Section 38(6) Planning and Compulsory Purchase Act 2004 that requires the decision to be made in accordance with the development plan unless material considerations indicate otherwise.

Planning Assessment

Principle

The site is to the south of a Scheduled Ancient Monument (SAM) and any development should not cause harm to the significance of this designated heritage asset.

The site also lies within a Local Wildlife Site where development should protect, conserve and enhance biodiversity, in accordance with Policy 31 of the Adur Local Plan.

The proposal is for a community and educational feature and any impacts arising from the development must be weighed against the community benefits that will occur.

***Visual amenity* and impact on scheduled monument**

The trench is to be built up to a height of 1.5m and was originally proposed to have a grassed bank sloping down to the shingle beach. Following discussions with the Sussex Wildlife Trust (SWT), who were concerned at the potential impact on the Local Wildlife Site, the applicants have agreed to cover the bank with vegetated shingle instead, to be more in keeping with the character and appearance of the beach. The bund will not be a tall structure and, covered in shingle it will not appear out of place. The land rises further to the south of the trench with grassed banks visible around the fort itself.

The County Archaeologist has assessed the impact of the raised trench on the setting of the Fort. He has concluded that:

"The proposals should have very little impact upon the setting of the Scheduled Monument, because of the lie of the ground, which would not block views of the Harbour from the Fort. Views between the Fort and the clearly visible near-contemporary (1842) heritage asset within the Fort's original landscape view envelope, Shoreham Lighthouse, also would not be blocked."

On balance, it is not considered that significant visual harm will arise as a result of this development.

Ecology and biodiversity

The site lies within Shoreham Beach Local Wildlife Site (LWS). The citation for the LWS advises that "*the site includes all of the landward side of Shoreham Beach, from Widewater Lagoon in the west to the old fort by the entrance to Shoreham Harbour. Its main interest is its highly specialised shingle flora, adapted to withstand harsh and extreme conditions. Largely due to habitat destruction, this community is very rare in West Sussex*."

Policy 31 of the Adur Local Plan states that:

"*All development should ensure the protection, conservation, and where possible, enhancement of biodiversity, including nationally and locally designated sites, Biodiversity Opportunity Areas (BOAs), marine habitats and other Biodiversity Action Plan (BAP) habitat areas, wildlife corridors, and protected and priority species. If significant harm cannot be avoided (by locating development on an alternative site with less harmful impacts), then such harm should be adequately mitigated. Where it cannot be adequately mitigated then such harm must be compensated for. Where it cannot be compensated for, then planning permission should be refused*."

It goes on to state:

"*Local Designations: Proposals for development in, or likely to have an adverse effect (directly or indirectly) on a Local Nature Reserve, Local Wildlife Sites (including ancient woodlands or wildlife corridors) or Regionally Important Geological/Geomorphological*

Site will not be permitted unless it can be demonstrated that reasons for the proposal outweigh the need to safeguard the nature conservation value of the site/feature."

A preliminary ecological appraisal has been submitted which advises that the area has been damaged and disturbed during recent flood defence works and that scrub is encroaching into the area. None of the rarer shingle vegetation species are present on the site.

The proposal will result in the loss of 0.07ha of shingle habitat but none of the rarer shingle vegetation species have been found to be present on the site. The proposed development will not impact the integrity of the local wildlife site or the species and habitats for which it has been designed.

Following discussions with the SWT the applicants have submitted a revised Construction Method Plan which states that they will remove existing invasive species and plant more appropriate species, such as starry clover, to enable a net biodiversity gain at the site. The bunds will not be grass seeded and will be covered with shingle instead and planted with species appropriate to the vegetative shingle habitat.

Sussex Wildlife Trust has stated in its latest comments that, while it does not normally support development on Local Wildlife Sites, they acknowledge the amendments to the proposal and the improvements which will see a net gain for biodiversity.

It is therefore considered that, in its amended form, this development will not cause harm to the LWS and will not therefore be in conflict with the aims of Policy 31.

Recommendation

APPROVE

Subject to Conditions:-

1. Approved Plans
2. Standard 3 year time limit
3. Implement in strict accordance with revised Construction Method Plan
4. Landscaping
5. No fence shall be erected without prior approval of LPA in writing

9 December 2019