

Council for British Archaeology

22 September 2016

Marine Management Organisation
Lancaster House
Hampshire Court
Newcastle upon Tyne, NE4 7YH

marine.consents@marinemanagement.org.uk

Dear Sir/Madam

Dover Harbour Board - Marine Licence Application MLA/2016/00227 Goodwin Sands Aggregate Dredging Scheme

The Council for British Archaeology (CBA) welcomes the opportunity to respond to the Marine Management Organisation (MMO) consultation on licence application MLA/2016/00227.

The Council for British Archaeology is an independent educational charity working throughout the UK to involve people of all ages in archaeology and promote the appreciation and care of the historic environment.

The CBA recommends that the MMO does not issue a marine licence to the Dover Harbour Board to dredge aggregates from the Goodwin Sands.

We would like to draw your attention to extracts from the Impact Assessment carried out by Royal HaskoningDHV on behalf of the Applicant relating to the potential for archaeological discoveries:

6.1.2 [Seabed Prehistory] Potential

*The feature seen in data by Wessex Archaeology (2015) is interpreted as a fluvial palaeochannel similar to those described above and could date from a range of periods between the Cromerian and the Early Holocene. **As such, the sediments could contain both in situ and derived anthropogenic artefacts and preserved paleoenvironmental material.***

6.2.2 [Maritime] Potential

*“Goodwin Sands represents a major hazard to marine navigation and, as such, has perhaps the highest density of recorded shipping losses in the UK (Wessex Archaeology, 2014). Many of the most important trade routes of northern Europe pass close to Goodwin Sands, which are located offshore of the Downs, formerly one of the most important commercial and naval anchorages off the English Coast. It has been estimated that over 800 shipwrecks have been documented on Goodwin Sands (Cant, 2013). This coupled with the difficulties of marking the position of wrecks, and consequently identifying and monitoring archaeological sites, means that **the potential for the presence of previously unrecorded wrecks on Goodwin Sands is very high.**”*

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6.2.3 [Aviation] Potential

“There is high potential for the remains of crashed aircraft on Goodwin Sands.....Despite the low number of documented losses from the study area, **the potential for aircraft remains to be present should be considered to be high. The locations of many of the aircraft losses may not have been recorded accurately, particularly during wartime, while many others have been lost without record. As for maritime remains (Section 6.2.2), geophysical survey, the geomorphology of the proposed dredging area and historic dredging activities suggest that, while the survival of intact aircraft within the study area is possible, discoveries of disarticulated aircraft remains are more likely to occur.”**

6.1.3 Value of Archaeological Receptors

“Discoveries of in situ archaeological and paleoenvironmental material are rare within the marine environment. Consequently any such discoveries will be of **high value.”**

4.3 “Impacts which results in damage or destruction of the heritage assets themselves, or their relationship with their wider environment and context, are permanent. Once destroyed a heritage asset cannot recover.”

Goodwin Sands is one of the most important marine archaeological areas around England. The Impact Report acknowledges that there is a very high chance of finding nationally important historical and archaeological material in the proposed dredging area.

The Report also recognises that damage to heritage assets is irreversible. The first indication of finding an unknown historic wreck, aircraft or prehistoric remains will be after it has been destroyed by the dredge head and appears in broken pieces on board the ship. Then it is too late and the damage will have been done. In these circumstances, a watching brief is insufficient mitigation. The presence of archaeological observers on board dredging vessels, whilst welcomed, will not mitigate the potential loss of fragile archaeological material such as wooden shipwreck or aircraft, because they will only see the damage or destruction once it has occurred.

Any discovery of nationally important artefacts would also impose an immediate and potentially expensive open-ended requirement for conservation, curation and storage.

Conclusion

As recognised by the Applicant’s own Impact Review, there is a very high risk of uncovering and permanently damaging maritime heritage sites of national importance, and the mitigation measures that have been proposed would not prevent this. The application for a marine licence should therefore be refused.

Yours sincerely



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Director

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