

GOODWIN SANDS **SOS** CAMPAIGN – STOP THE DREDGE!

SUGGESTED POINTS OF OBJECTION FOR THE PUBLIC CONSULTATION PERIOD 17TH AUGUST TO 28TH SEPTEMBER 2017

We only have until **28th September 2017** to send our objections about the proposed dredging to the Marine Management Organisation (MMO). Please write something personal and straight from the heart, including any of the points mentioned below that you feel most strongly about, as well as anything else you feel is important.

HERITAGE

IN 2015, Wessex Archaeology (WA), Dover Harbour Board's (DHB) consultants, described the Goodwin Sands as '**archaeologically extraordinary**'. This is because they have the highest density of maritime heritage assets in UK waters. The repeated geophysical surveys conducted in May '17 identified a total of **305** anomalies scattered through out the proposed dredging area, a significant increase from just **6** in July '15. These could be either parts of shipwrecks or military air crash sites, yet WA has not recommended further investigation of any of them. **Why not?**

WA have recommended 25m radius buffer zones around each unidentified object, which has forced DHB to reduce the width of the dredging zone to as little as **200m** in some places. However, **23** significant anomalies still remain in the reduced dredging zone; avoiding these will make it look like a Swiss cheese! The sand pedestals created around these unidentified sites will become very unstable and eventually collapse, thereby damaging the objects they were meant to protect. **One particular cluster of anomalies could potentially be part of a crashed military aircraft or even a wooden shipwreck, yet no investigations have been recommended.** Some may consider this tantamount to professional negligence.

These anomalies could represent the final resting places of any of the thousands of mariners and scores of WWII aircrew who have perished on the treacherous Sands.

SEALS

The dredging timetable for 2018 and 2019 is May to August and June to July respectively, which coincides **exactly** with the breeding season of the grey and harbour seals. A 1.5 km buffer zone around their haul-out site is intended to protect the seals but vibration and noise travel far further underwater and the seals will still be disturbed and their behaviour seriously affected.

FISHING

DHB claim that the fishing grounds of the Goodwin Sands are of **little** importance and that more prolific areas of fishing are to be found outside them. Local fishermen are unanimous in telling us otherwise and however small their business, their livelihoods will undoubtedly be dramatically affected by the dredging.

COASTAL EROSION

The MMO and the Environment Agency are taking our concerns about the protection the Goodwin Sands offer our vulnerable foreshore very seriously. **DHB are not.** Chronic coastal erosion is on-going and we must ensure that these uncertainties are properly addressed and not ignored by DHB or their contractors. Contrary to popular belief, the Sands do **not** regenerate themselves; they move but they do not breed!

ALTERNATIVE DREDGING SITE – AREA 501

Due to immediate pressures, DHB have arranged to source 500,000 m³, (750,000 tonnes) of aggregate from a newly licenced area in the Outer Thames Estuary. However, DHB still wish to take 2 million m³ (**3 million tonnes**) from the Goodwins, which is still a significant amount! Area 501 lies 41 nautical miles from Dover, well within the industry norm in terms of distance from dredge site to wharf. It is geotechnically suitable, with no restrictions imposed upon it and is licenced to produce up to 6 million tonnes of aggregate a year for 15 years starting summer '17.

Obtaining aggregate from Area 501 will also **not** require under-resourced Government Agencies, such as Historic England, the MMO, Natural England and the Environment Agency, having to continually monitor and report upon mid and post dredge surveys well into the future. It will also mean that on-board archaeological, explosives and marine mammal observers will **not** be needed, at a saving to DHB.

ECONOMICS

DHB cite the extra cost of obtaining aggregate from Area 501 as the main factor against it. However, the public cannot be held responsible for DHB's inadequate planning, which omitted to include a contingency budget. Despite rampant scaremongering, the fundamental infrastructure of Dover Western Docks Revival is **not** financially at risk if DHB cannot dredge the Goodwin Sands.

Please write with your objections to the MMO, quoting reference

MLA/2016/00227 before 28TH SEPTEMBER 2017

email: marine.consents@marinemanagement.org.uk or in writing to

MMO, LANCASTER HOUSE, HAMPSHIRE COURT, NEWCASTLE UPON TYNE, NE4 7YH

THANK YOU VERY MUCH FROM ALL THE GOODWIN SANDS SOS TEAM!