

28th September 2017

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

Attn. Mr. David Morris, Marine Licensing Case Officer
Marine.consents@marinemanagement.org.uk

Dear Mr. Morris,

Dover Harbour Board- **Marine Licence Application MLA2016/00227**
Goodwin Sands Aggregate Dredging Scheme.

Introduction

The British Sub Aqua Club is the national governing body (NGB) for the sport of sub aqua diving and snorkelling for the United Kingdom of Great Britain and Northern Ireland. As such we represent the interests of the recreational diving community; these interests include the protection of the underwater cultural heritage. Earlier in the year we responded to the consultation on the Goodwin Sands Aggregate Dredging Scheme. At the time we were concerned that the methodology of the seabed survey was limited in what it could find. We made the point that absence of evidence was not evidence of absence-an old archaeological saying but still true. We also noted that other aggregate extraction sites were also available that would not have a detrimental effect on the very special underwater cultural heritage that is to be found on the Goodwin Sands.

Updated comments

Having seen the new material, and read with interest further interpretation of some of the results by 3H Consulting, of which a copy has been sent to the MMO, we have come to the following conclusions:

- 1. The extracted material could contain important material-currently ephemeral-but nonetheless of national importance;*
- 2. The surveys themselves demonstrate that interpretation of the results can be subject to debate;*

3. *We do not yet know what we cannot see and once heritage assets are destroyed then the evidence they may provide to future generations is not recoverable;*
4. *Surveys in 2016 had failed to highlight areas of importance. This failure has resulted in the substantial reduction of the potential extraction area once further surveys were undertaken. The chance that this failure to see and interpret is likely to be repeated must make this licence application of deep concern to the heritage agencies;*
5. *The failure to ground truth anomalies found in the last survey is an inherent weakness in the proposal.*

Conclusion

Our conclusion is that as the National Governing Body representing recreational divers we have a responsibility to protect the underwater cultural heritage for this generation of divers, and for the future. While we appreciate that following earlier consultations a more robust survey, using more appropriate survey techniques, has been undertaken, and the results scrutinized carefully by a number of professionals, we do not know what techniques of discovery and recording may be available in the future. It is important that the diving organisations help to preserve areas from exploitation where we believe important material may be damaged by that exploitation. As a consequence, we must recommend that the MMO does not issue a marine licence to the Dover Harbour Board to dredge aggregates from the Goodwin Sands.

This response was prepared for the British Sub Aqua Club by Jane Maddocks MA., Wrecks and Underwater Cultural Heritage Advisor to the British Sub Aqua Club.

Yours sincerely,

Jane Maddocks

Jane Maddocks MA
Wrecks and Underwater Cultural Heritage Advisor