



David Morris

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Date 28 September 2017

Dear Mr Morris

**RE: MLA/2016/00227 - Goodwin Sands Aggregate Dredging Application -
Further Information Consultation**

Thank you for inviting Kent County Council (KCC) to respond to the Marine Management Organisation's consultation on further information relating to Port of Dover's application for this marine aggregates licence.

KCC is supportive of the Dover Western Docks Revival Scheme, given its potential to create a positive economic and social impact on the Kent and national economies. With respect to the specific application for the proposed licence, we set out our specific environmental considerations below.

In KCC's response to the previous consultation (letter dated 18 November 2016), we found no basis on which to object to the proposal, although we did highlight concerns as to the historic environment where we supported Historic England's request for further surveys and information. We welcome the recent submission by the Port of Dover of further survey data, although we understand that Historic England still has concerns particularly with regard to the Written Scheme of Investigation which has not been updated following the recent survey. As you will be aware, the Goodwin Sands contain many important heritage assets in a highly dynamic environment and we would recommend that these concerns are addressed.

The changes to the to Port of Dover application outlined in the current consultation in terms of mitigation measures relating to the natural environment are positive from our perspective and we maintain our position to approve this aspect of the proposal.

On the subject of alternative sources of aggregates: in our response to the original consultation (letter dated 19 July 2016), our Planning Applications Group focused on whether land won sources of aggregate within Kent (primary or secondary aggregates) could provide an alternative to the Goodwin Sands dredging material and concluded that this would not be possible "without adversely affecting the ability of the sites to serve existing markets and / or giving rise to significant transportation effects." However, we also pointed out that as we are not the Mineral Planning Authority in this case, it is for the Port of Dover and the Marine Management

Organisation to consider which sea-dredged aggregates should be used. We therefore have no further comment to make on this aspect of the consultation.

After consideration of the information presented in this current consultation, we found no basis to object to the licence being granted, provided that appropriate measures are in place to safeguard the historic environment as highlighted by Historic England's expected request for an improved Written Scheme of Investigation.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'K Stewart'.

Katie Stewart
Director of Environment, Planning and Enforcement