

Date: 28 September 2017
Our ref: 223619
Your ref: MLA/2016/00227



David Morris
Marine Management Organisation

3rd Floor,
Guildbourne
House
Chatsworth Road
Worthing
BN11 1LD

BY EMAIL ONL

Dear David,

Re: MLA/2016/00227 Further information for Goodwin Sands Aggregate Dredging Scheme.

Thank you for your consultation dated 17 August 2017 requesting Natural England's comments on the additional information provided by Dover Harbour Board (DHB) in relation to their marine license application. The following constitutes Natural England's formal statutory response and is set out as per the sections of the Response to MMO Clarification Requests, December 2016 document.

1. Introduction

No comments.

2. Project Update

We are pleased that DHB have taken Natural England's and others' concerns into account, and we welcome the reduction in volume of sediment to be removed from the Goodwin Sands recommended Marine Conservation Zone, the revised dredge footprint and the amendments to the overall dredging programme.

3. Consideration of Alternatives

Whilst we continue to remain of the view that aggregate dredging within marine protected areas or within areas which have been identified for potential future protection should be avoided wherever possible, we welcome further additional information provided by DHB regarding the consideration of alternative sources of material (including recycled material), locations, and the pros and cons of using larger/smaller dredgers to travel greater distances and their associated increases in energy consumption.

Table 3-1 shows the vessel CO₂ emissions from marine aggregate extraction sites within 200km of the Port. It is not clear whether the figure quoted for Goodwin Sands (62,058,020) is for the number of trips required to obtain the original amount of aggregate (2.5million m³) or the revised amount (2million m³).

4. Social and Economic

No comments to make.

5. Marine Mammals

We note the confirmation from DHB that the 1km buffer does apply to both harbour and grey seals, as per our comment to the MMO back in November 2016.

6. Heritage

No comments to make.

7. Nature Conservation

We welcome confirmation from DHB that the proposed dredge area has now been revised to exclude the areas of subtidal coarse sediment in the north east corner.

8. Fisheries and Shellfisheries

We thank DHB for including a chart showing the original and current PIZ and SIZ with the benthic trawl and grab locations overlain, as per our request to the MMO in November 2016.

9. Summary

No comments to make.

Additional comments

We would still like DHB to consider our previous license condition request that “ the license holder must ensure that upon cessation of dredging the sediment substrate must be of a similar grade to the conditions that existed before dredging commenced with due allowance being made for natural sediment movements” and whether this will help to inform the Preliminary Environmental Monitoring Plan. We are therefore again seeking this confirmation and further acknowledgement from DHB that this Plan is currently in production. Natural England can provide advice on the requirements of the monitoring/surveys as part of our Discretionary Advice Service, details of which can be found on the Gov.uk website here <https://www.gov.uk/guidance/developers-get-environmental-advice-on-your-planning-proposals>. This early engagement will help to reduce the number of iterations of the plan, once a draft has been submitted to the MMO for consultation.

For any queries relating to the content of this letter please contact me using the details provided below.

Yours sincerely,

Kate Bull
Lead Adviser, Kent & Sussex Area Team
E-mail: kate.bull@naturalengland.org.uk
Telephone: 02080 268012