Marine Management Organisation
PO Box 1275
Newcastle upon Tyne
NE99 5BN

Our ref: KT/2016/121740/01-L01
Your ref: MLA/2016/00227
Date: 13 September 2016

Dear Sir/Madam

Proposal: Re-consultation for additional comments on EIA Scoping Opinion (Aggregate Dredging) - Goodwin Sands Aggregate Dredging Scheme
Location: Goodwin Sands, Off the Kent Coast

Thank you for the opportunity for us to make additional comments on the above application. We have reviewed the documents and we **object** to the application for the following reason:

Reason

There is currently missing information in the Water Framework Directive (WFD) section of the Environmental Impact Assessment (EIA) and until this information is provided, we cannot make a final decision.

The Goodwin Sands is exposed on certain spring tides and is therefore classed as intertidal. The maps provided indicate that the northern eastern-most corner of the dredge area does appear to be intertidal. If areas of intertidal are to be dredged, or within 10m of a dredge area, the WFD assessment should screen in hydromorphology for further assessment as per guidance in 'Clearing the Waters'.

Please check that hydromorphology should be screened out and provide evidence to justify. If you find that hydromorphology should be screened in, then please consider the following:

- Quantify the area of intertidal to be lost (the northern eastern-most corner of the dredge does appear to be intertidal) and express it as a percentage of the total similar habitat in the waterbody;
- Assess the value, biologically of the intertidal area to be lost (it is expected to be valuable, even though it is sand based and not mud based) e.g. it is known to be used by seals;
- If valuable, assess if this percentage loss is significant. Could it could cause deterioration in the waterbody?
- If valuable, assess whether the increase in depth to the south west of remaining intertidal area could result in increased wave energy (prevailing I believe to be from the southwest) which could result in further loss of the intertidal.
- If valuable, assess how quickly this dredged intertidal will become intertidal again as sand accretes again and whether there is a sediment source to provide this (i.e. a budget). Some sources of sediment are in depletion and left over from the end of last glacial period and may not re-establish.

We apologise for the delay in these comments. We trust this additional information is of use, and if you have any questions please do not hesitate to get in touch.

Yours faithfully