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4<sup>th</sup> June 2017.

Dear Mr. Pater,

**Marine Aggregate Dredging Application MLA/2016/00227, South Goodwin Sands, Area 521.**

Thank you for your reply of 22<sup>nd</sup> May 2017 to our letter of 27<sup>th</sup> April concerning assessment of the existence and location in the Goodwin Sands of the remains of WWII aircraft and the “last resting place” of their crew, and in relation to the proposal to dredge the western strip of the southern section of the Goodwins and its status for protection under the Protection of Military Remains Act 1986.

We understand the reasoning behind Historic England’s recommendation to the Marine Management Organisation and the Dover Harbour Board for a magnetometer survey, notwithstanding the fact that such a survey only detects the ferrous component in any such remains and the structure and crew remains will not, generally speaking, display this feature significantly.

Having given further consideration to these matters and your own reply, we would be grateful for your additional advice on the following points:

1. To what depth of penetration will a magnetometer survey reach ?
2. Sonar surveys of different types were conducted by the Dover Harbour Board (DHB) in their original archaeological survey of the area, the report on which accompanied their application EIA. A matter we were not able to establish from the DHB’s EIA, or from subsequent correspondence with the MMO, was the depth of penetration of these sonar surveys. What was the depth of penetration by these sonar surveys ?
3. Has Historic England made any recommendation to the MMO and DHB that these sonar surveys of the proposed dredging area be repeated when the magnetometer survey is conducted ? If so, what type of sonar surveys will be conducted and what is their expected depth of penetration ?
4. It is known that there are at least 800 wrecks of ships (possibly many more, if the timescale and recording system is open ended) and over 60 WWII aircraft which crashed there during the Battle of Britain (possibly many more, if the whole duration WWII is taken into account). Significantly, these aircraft and many of the shipwrecks will not have possessed a ferrous metal structure and thus are undetectable to a magnetometer survey. Given this fact, it is possible that the

magnetometer survey will not readily identify the existence of wrecks of ships or aircraft (only undefined ferrous material of an associate nature). In turn, this means that a magnetometer survey of the proposed dredging area may come up with a survey picture that appears essentially “blank” with regard to the presence of ships and aircraft (only recording undefined ferrous material of an associate nature or, indeed, unassociated nature). An interpretation of the proposed dredging area’s magnetometer survey will, accordingly, prove difficult and particularly so because it appears that there is no other section of the Goodwins which is being subject to a similar type of survey at the same time, thus eliminating the important tool of a “control survey” by which to reference the proposed dredging area results.

In short, if the magnetometer survey of the proposed dredging area draws essentially a “blank” result, how do we know whether this result is an accurate portrait of the existence of archaeological remains ? If no control survey of another section of the Goodwin Sands exists how do we know whether a “blank” result is normal or exceptional ?

We would be most grateful for your comment on the above 4 points.

We advise that we have also made a copy of this letter to you available to the MMO Licensing Manager.

Yours sincerely

D. Levy

S. D. Eades

cc. Dr. J. Flatman (HE)