

Marine Licencing Team

Cardiff Permitting Centre
Natural Resources Wales (NRW)
29 Newport Road
Cambria House
Cardiff
CF24 0TP

14 January 2025

RE: Marine and Coastal Access Act 2009: Part 4 – Marine Licencing. Licence to dispose via trickle dredging from Neyland Yacht Haven into Milford Haven Waterway. Licence Number: DML1743v3

PROPOSED SEDIMENT SAMPLING PLAN

Dear Sir/Madam,

This letter sets out our proposals for proposed sediment sampling and analysis, as specified under Condition 9.14 of NRW Licence Number DML1743v3. The proposed sediment sampling plan (PSSP) specified in this letter is in line with advice provided by the Centre for Environment, Fisheries and Aquaculture Science (CEFAS), under contract to NRW (Ref SP2207), in May 2022. In 2022, this sampling was undertaken by Neyland Yacht Haven Ltd. staff, but the 2025 sampling shall be undertaken by Carcinus Ltd. staff.

The main aspects of the PSSP are summarised below:

1. The OSPAR Guidelines for the Management of Dredged Material¹ recommend that where the volume of dredged material is <25,000 m³, three samples should be collected. However, given the small volume of sediment removed (<5,500 tonnes per year), it is proposed that two (2 no.) sample stations are sufficient. This is in line with Cefas advice provided in relation to the 2022 PSSP and as undertaken in the 2022 sampling plan. The coordinates of the proposed sampling locations are given in Table 1 and presented spatially in Figure 1. Site A is positioned within the Neyland Yacht Haven lower basin and Site B is positioned within the Neyland Yacht Haven upper basin.
2. Samples will be taken from the sedimentary surface at each location using a small stainless steel hand-held Van-Veen Grab (or similar). Samples will be taken from the grab with an appropriate metal or plastic scoop and transferred to appropriate containers for storage in a coolbox/fridge prior to analysis.
3. The samples will be transferred, via courier to the SOCOTEC analytical laboratory, which is NRW validated for dredge spoil analysis for Marine Licence purposes). The following analytes are proposed:
 - Trace metals (As, Cd, Cr, Cu, Hg, Ni, Pb & Zn); and
 - Total Hydrocarbon Content (THC)

N.B. It is not proposed to analyse the samples for other analysis suites such as Polycyclic Aromatic Hydrocarbons (PAHs), Polychlorinated Biphenyls (PCBs), Organotins, Total Organic

¹ Available at: <https://www.ospar.org/documents?v=33037> Accessed January 2025.

Carbon (TOC) etc., as analysis undertaken under previous PSSP has indicated negligible concentrations of these contaminants.

4. Concentrations of contaminants will be tabulated and compared to published thresholds for determining suitability of marine sediments for disposal at sea (CEFAS Action Levels). Results will also be provided in the standard NRW/MMO Dredge Template².

Table 1 - Coordinates of sediment sample collection locations as part of the Proposed Sediment Sampling Plan in relation to Marine Licence DML1743v3 Condition 9.14.

Sample	Latitude (WGS84 °)	Longitude (WGS84 °)
Site A - 0m	51.71056	-4.94167
Site B - 0m	51.71417	-4.94167

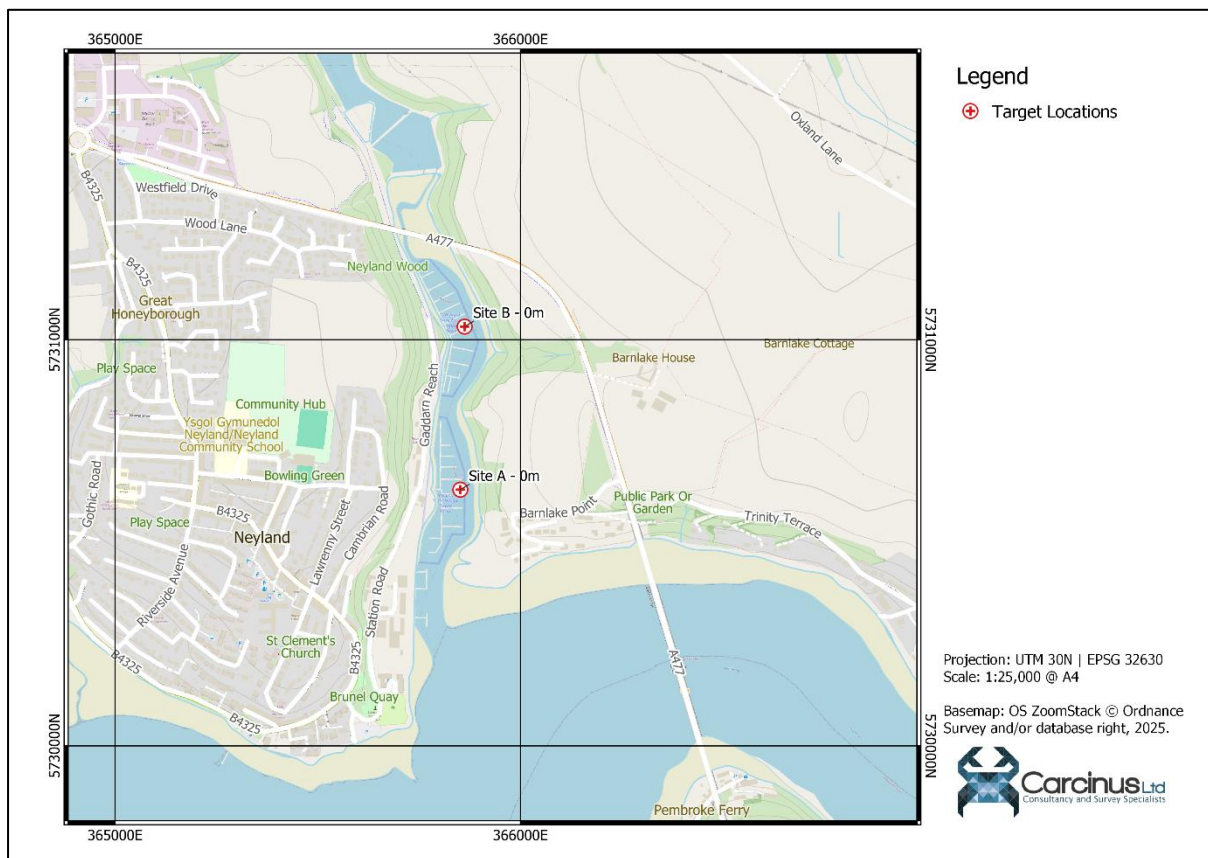


Figure 1 - Target sampling locations as part of the Proposed Sediment Sampling Programme in relation to Marine Licence DML1743v3 condition 9.14.

Yours sincerely,

Matthew Crabb

Director

Carcinus Ltd.

² NRW Sample Analysis Results Template. Available at:

<https://cdnfd.cyfoethnaturiol.cymru/media/696206/nrw-ps-analysis-results-template.xlsm?mode=pad&rnd=133614596085870000> Accessed January 2025.