

Councillor John Thomas  
The Vale of Glamorgan Council  
Civic Offices  
Holton Road  
Barry  
CF63 4RU

25 October 2017

Dear Councillor Thomas,

**Re: Marine Licence 12/45/ML: Cardiff Grounds Severn Estuary: Hinkley Point  
dredge/disposal**

Thank you for your letter of 10 October 2017 to Dr Emyr Roberts. You may be aware that Dr Roberts is due to retire from NRW on 31<sup>st</sup> October and I have been asked to respond on his behalf.

We recognise the level of public concern regarding the operations that are associated with the above licence and the need to ensure that there is no risk to the environment or human health as a consequence of the dredging/disposal activity.

It may be helpful if I briefly clarify the historical sampling that has occurred at the dredge site;

- i) 2009: Ten samples were taken up to four depths at each site. Five of these sites were sampled between 0 and 1m depth. The other sites were sampled between the following depth range (in metres): 1.94 - 2.16, 3.00 – 3.08, 3.00 – 4.12, 4.35 – 4.42 and 4.70 – 4.80

The samples were independently analysed by the Centre for Environment, Fisheries and Aquaculture (Cefas) and had been collected at that time to specifically inform the Environmental Impact Assessment for the Hinkley development.

- ii) In 2013, seventeen surface samples were collected by the applicant and analysed by Cefas, who then provided technical advice to NRW. As the material at depth would not have significantly changed since this time, the supplied 2009 sample results were used in conjunction with the 2013 surface samples to inform Cefas advice to NRW.

These samples were again independently analysed by Cefas and they also provided a technical interpretation of the results. The results were also scrutinised by technical specialists from NRW and the Environment Agency.

They concluded that the material was suitable for disposal at the Cardiff Grounds site both in terms of its physical and chemical composition in accordance with the Convention for the Protection of the Marine Environment of the North-East Atlantic (the OSPAR Convention). In addition, it also included a radiological assessment against the de-minimus criteria adopted by the International Atomic Energy Agency.

- iii) In January 2017 NRW (with advice from Cefas) agreed a new sample plan with the licence holder. This new sample plan was required by a licence condition as three years had passed since the last sampling results. The licence holder also informed NRW that they do not plan to dispose of arisings from the Jetty dredge site at Cardiff Grounds. The plan is therefore essentially the same as the previous sampling plan in 2013 with the exclusion of samples at the jetty dredge site. The plan requires surface chemical and radiological samples for the same determinants.

The marine licence that regulates this activity was issued on 11 July 2014 and includes a range of project specific conditions, including prior sampling of the Hinkley dredge site.

As this suggests, prior sampling is required but we do not intend to undertake any form of consultation in relation to the sample results in order discharge the relevant licence conditions. We are content that we have sufficient expertise and capability within NRW and through our arrangements with the Environment Agency and procured consultants to provide us with a technical assessment and advice. Our role is to ensure any samples do not breach existing guidelines and compromise the environment or people's health. However, all the sampling documentation is on our public register and can be requested as necessary by your authority and others.

I hope you find the above information useful and informative. Finally, I can confirm that representatives of NRW would be happy to attend any proposed meeting with the Cabinet Secretary and other local authority leaders to discuss this matter.

Regards,



**GARETH O'SHEA**  
**Executive Director of Operations South East Wales/Cyfarwyddwr Gweithredol Gweithrediadau De Cymru**

Croesewir gohebiaeth yn y Gymraeg a'r Saesneg  
Correspondence welcomed in Welsh and English