

Mr Thomas Boothroyd
Neath Port Talbot Council
Planning Department
The Quays
Brunel Way
Baglan Energy Park
Briton Ferry
SA11 2GG

Dyddiad/Date: 1 December 2021

Annwyl / Dear Mr Boothroyd

BWRIAD / PROPOSAL: Non-material amendment to condition 10 (to allow for 12 month intervals for submission of monitoring of the existing spring water supply at Cefn Faes Uchaf Farm instead of the current 6 month interval) and condition 72 (to amend the frequency of TWP meetings) attached to planning permission P2019/5301.

LLEOLIAD / LOCATION: Gilfach Quarry, Gilfach Road, Neath, SA10 8AD.

Thank you for consulting Cyfoeth Naturiol Cymru/Natural Resources Wales on the above application, which we received on 28th October 2021.

We have no objection to the amendment of condition 10 and condition 72 of planning permission P2019/5301.

We have reviewed the following documents:

- Letter dated 18th June 2021 from Breedon to Neath Port Talbot County Borough Council. Re: Submission Pursuant to Conditions – Gilfach Quarry, The Rhyddings, Gilfach Road, Neath. Planning Permission No. P2010/0655.
- Letter dated 20th October 2021 from Breedon to Neath Port Talbot County Borough Council. Re: Proposed Non-Material Amendments to Condition Nos. 20 and 80 – Gilfach Quarry, The Rhyddings, Gilfach Road, Neath. Planning Permission No. P2019/5299.
- Technical Memorandum dated 15th June 2021 (internal memo at Breedon). Re: Gilfach Quarry: Cefn Faes Uchaf Farm Spring Water Levels and Groundwater Level Data.

We have no objection to either amendment, however we do have the following observations on the monitoring and data presentation that should be considered and acted on for the next monitoring reporting.

1. y-axis: This needs to be checked as the measurement is in metres below top of concrete. Therefore the zero value represents the top of the concrete (or potentially ground level) and any value below this should be below the measuring point. The data has been interpreted to imply that the lowest water levels were in March 2021. Normally groundwater levels and flow are highest in March and then regress during the summer months to lower levels. This potentially explains the flat lining of the data in the summer months at 0.8m. Needless to say, the data presented is potentially upside down. This should be checked with manual dips on site and the graph data checked.
2. Re-adjust the depth of the data logger: The flat lining of the data in the summer months implies that the water level is dropping below the measurement range of the data logger. As such it is not measuring the lowest levels of the spring which are the important levels for detecting derogation over time.
3. Frequency of measuring: The data logger is measuring every 15 minutes; we would be happy with this frequency being reduced to hourly. This will lengthen the battery life of the device and increase storage capacity without affecting data resolution.
4. We note that BH01/07 and BH10/07 are being used to trigger actions of increased monitoring at the private water supplies (PWS). These are located on the western edge of the quarry whereas the Cefn Faes Uchaf Farm is located on the eastern side of the quarry extension area. BH02/07, BH03/07 and BH04/07 are much closer to the PWS so we question why these boreholes are not being used.

We would be happy to attend the Technical Working Party meetings.

Our comments above only relate specifically to matters included on our checklist, *Development Planning Advisory Service: Consultation Topics* (September 2018), which is published on our [website](#). We have not considered potential effects on other matters and do not rule out the potential for the proposed development to affect other interests, including environmental interests of local importance.

We advise the applicant that, in addition to planning permission, it is their responsibility to ensure they secure all other permits/consents/licences relevant to their development. Please refer to our [website](#) for further details.

If you have any queries on the above, please do not hesitate to contact us.

Yn ddifffuant / Yours sincerely

Sharon Luke

**Ymgynghorydd Cynllunio Datblygu Uwch / Senior Development Planning Advisor
Cyfoeth Naturiol Cymru / Natural Resources Wales**