

NRW Formal Response to Pembrokeshire County Council's Local Development Plan 2 HRA as updated in response to the Inspectors' Initial Questions

24TH April 2026

Please accept the following as NRW's formal comments.

Nutrient sensitive SAC's

We support your Authority's approach to the rLDP and the consideration of nutrients impacts on SACs in the HRA. We recognise the Council has had regard to our advice, as required under the Habitats Regulations. We are satisfied that your Authority has adopted a suitably precautionary approach and proposed reasonable and evidenced pathways to avoid adverse effects on nutrient sensitive SACs. In particular, we recognise the detailed work that has been undertaken to quantify impacts and mitigation options at sub-catchment level. We note detailed certainty is rightly deferred to project-level HRA, and this is secured via a policy caveat approach, which we support. We therefore agree that the provisions in respect of nutrient impacts for the rLDP are sufficient to avoid adverse effect on site integrity, subject to future project HRAs.

Notwithstanding the above, we would like to provide some clarity on interpretation of our advice in respect of Wastewater Treatment Works (WwTWs) with revised permits in failing catchments. In the longer term, the AMP8 programme aims to limit phosphorus discharges from WwTWs in combination at a catchment scale, as an Article 6(2) measure to help meet phosphorus water body targets. This programme of work is scheduled for completion by 2032. In the meantime, there may be circumstances where there is capacity to receive additional wastewater within revised permit limits, however, increased connections to an individual works may lead to a net increase in P discharges, due to the existing level of works performance, i.e. where those works are already operating below revised permit limits. This means that more phosphorus could be discharged into a failing SAC and this could lead to deterioration in the short term, pending completion of all AMP8 improvements within the catchment. For this reason, we advise that development proposals with connections to such works should be considered within a project-level appropriate assessment. For completeness, we suggest this should be reflected in the wording of Policy SP12A and could be accommodated with the following wording:

Phosphorus: In the hydrological catchment area designated for riverine SACs, development creating wastewater discharges will be required to demonstrate there is capacity within the environmental permit limits set at the Wastewater Treatment Works

to which it drains, taking account of fair share principles within the catchment into which the Works discharges. **In addition, development should not lead to any deterioration to a SAC failing to meet phosphorus targets or delay the achievement of meeting its conservation objectives.** Phasing of housing development will be required to match the delivery of anticipated Sewage Treatment Work improvements as set out in Policy GN 13 Residential Development, Policy GN 16 Residential Allocations, Policy GN 17 Residential Commitments and the Local Development Plan's Delivery Appendix.

In addition, we advise that for consistency and clarity, the spelling of phosphorus is corrected throughout the rLDP (i.e. all references should be to phosphorus, not phosphorous or phosphates).

We have also noted an error in Appendix D (NEW) - Proposed Edits to the Pembrokeshire Local Development Plan 2 – Examination Edits. The final explanatory note on page 15 still references GN47; this needs to be amended to SP12A.

Finally, we note that PEDW have asked for clarity on AQ matters ((ED08) [Initial Questions Letter PCC Response](#) – page 10 provides a summary of liaison with NRW to date under 'Advice to date that the Council has had from NRW'). In case it is of assistance at this stage, we note that you consider the level of development in the area will not cause a significant increased contribution to nitrogen deposition from road transport and that where a proposal has the potential to result in an increase in road traffic this will be assessed via an independent project level HRA. We are satisfied with this approach.

We hope these comments are clear and helpful to you. Should you have any queries, please contact us.

Kind regards

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