

Cyngor Sir Penfro
Cynllun Datblygu Lleol Diwygiedig 2017–2033
ARHOLIAD
Pembrokeshire County Council
Revised Local Development Plan 2017–2033
EXAMINATION

Arolygwyr / Inspectors:
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Exploratory meeting: Agenda

Date and time: 10.00 Tuesday 16 June 2026

Location: County Hall, Haverfordwest, SA61 1TP

Purpose of meeting: *To discuss the content, evidence and potential impacts of the Pembrokeshire Local Development Plan (LDP) 2 on marine and riverine Special Conservation Area. This includes ongoing work by Natural Resources Wales (NRW) on Catchment Nutrient Reduction Plans; whether further evidence is required and can be provided in a reasonable timeframe; and to inform the Inspectors' recommendations regarding next steps of the examination.*

Invited participants:	Harriet Lavender	Pembrokeshire County Council
	Martina Dunne	
	Tom Nettleship	
	Bob Smith	
	Mark Newey	Welsh Government
	Mary Lewis	Natural Resources Wales
	Ruth Jenkins	

Items and questions for discussion

- 1. Introductions**
- 2. Update on Catchment Nutrient Reduction Plans**
- 3. Issue 1: Given the extent to which Plan allocations are affected, is it feasible for the Council to produce an indicative mitigation action plan retrospectively?**
 - What are the anticipated timescales for implementing the Catchment Nutrient Reduction Plan (CNRP) for the marine and river Special Areas of Conservation (SACs)?
 - Over what period will the CNRP operate, and the growth assumptions on which it will be based?

- How will the CNRP be integrated with other delivery and management plans? Is it a prerequisite of the sought-after indicative mitigation action plan?
- If there is a lag in the production of the CNRP, which evidence sets out the measures (actions) which could be relied upon in the interim to improve and restore SACs?

4. Issue 2: Are allocations within nutrient-sensitive SAC catchments – and therefore the Plan as a whole – deliverable?

- Is nutrient neutrality a viable backstop, if it is required prior to the establishment of an integrated approach in the County?
- When might the ‘appropriate financial contributions’ referred to in the Welsh Government’s Position Statement which may be needed to improve and restore SACs become known?
- Is there sufficient certainty that those financial contributions could be secured in line with current legislation (Community Infrastructure Levy Regulation 123) and policy tests (Planning Obligations Circular 13/97)? If not, might those be changed and is there a timescale for this?
- If there is indeterminate evidence of the implications of either a nutrient neutrality or integrated approach on the deliverability of development, what weight should be attached to the Welsh Government’s Position Statement, and its call for a flexible and adaptive consideration, in our determination of the LDP’s soundness?

5. Issue 3: Are the mitigation measures sufficiently ‘secure’ as to be relied upon in the Appropriate Assessment?

- Can the measures which the CNRP will include (with the intention of achieving the SACs’ favourable status over time) be regarded as ‘secure’ in Habitats Regulation Assessment (HRA) terms if they are unknown or unclear? What may be relied upon in advance of the CNRP?
- Is an LDP policy which references a future Supplementary Planning Guidance (SPG) note and/or a future CNRP a form of mitigation which would allow the Council to conclude that there would be no adverse effect on site integrity? Would a draft or outline SPG and/or CNRP be needed – and if so, at what level of detail?
- Notwithstanding the soundness tests, is the absence of alternative solutions a legitimate consideration for the HRA, without proceeding through to the derogation steps?
- What weight should the Welsh Government’s Position Statement (and its call for flexible and adaptive consideration) carry in relation to our determination of the LDP’s compliance with sections 62 and 63 of the Planning and Compulsory Purchase Act 2004, and of regulations under section 77, under section 64(5)(a)?

6. Other matters

- Notwithstanding the above, is there scope for the conclusions in the HRA to be informed by the findings in NRW’s Condition Assessment for the Pembrokeshire Marine SAC (June 2025) regarding the extent of dissolved inorganic nitrogen originating from point source sewage discharges?

- Related to this, has it been considered whether the level of growth planned prior to the establishment of an integrated approach would undermine the achievement of the conservation objectives (utilising the so-called threshold-based approach)?
- Are further amendments needed to proposed policy GN 47 (SP 12A)?

7. Next steps