
ff/t: 01437 775545 e: programmeofficer@pembrokeshire.gov.uk

Exploratory meeting note

Held on Tuesday 16 June 2026 at 10.00 at County Hall, Haverfordwest

1. Introductions

The exploratory meeting was opened at 10.00 by the Inspector, Ian Stevens, who has been appointed by the Ministers of the Welsh Government to hold the examination of the Pembrokeshire Revised Local Development Plan (LDP).

The Inspector introduced Deborah Williamson, the Programme Officer for the examination. A colleague from Planning Environment Decisions Wales was also present to observe the meeting.

The invited participants introduced themselves:

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

(Participants from Natural Resources Wales joined the meeting virtually)

It was advised that translation facilities were available should any participant wish to speak in Welsh.

Several observers were watching the meeting in person and virtually. However, the Inspector explained only those invited to participate could contribute to the meeting as it was a focussed discussion on specific issues.

The purpose of the exploratory meeting was to discuss the LDP's potential impacts on water quality, including the effects on the integrity of the Cleddau Rivers and Pembrokeshire Marine Special Areas of Conservation (SACs). The Inspector provided an overview of the water quality issue where it applies to Pembrokeshire and summarised the concerns raised in previous correspondence (letters dated 2 December 2025 and 8 May 2026). Other than these

issues, the LDP contents and representations received during previous consultation stages would not be discussed. The Inspector reiterated that before deciding how to proceed with the Plan, the issues needed to be discussed at this meeting.

Welsh Government's Position Statement on Nutrients was accepted into the examination library (ED20). The Inspector reminded participants that whilst the contents of the Statement will be considered, decisions regarding how the examination proceeds would be for the appointed Inspectors to make alone.

2. Presentation from Natural Resources Wales on the Catchment Nutrient Recovery Plan

Natural Resources Wales (NRW) gave a presentation on the ongoing preparation of a Catchment Nutrient Recovery Plan (CNRP) in Pembrokeshire. This work is set in the context of an integrated approach, as set out in national policy. The integrated approach seeks to align ongoing delivery of restoration measures (under Articles 6(1) and 6(2) of the Habitats Directive) in SACs which are not currently meeting their conservation objectives for nutrients with potential mitigation and compensation (under Articles 6(3) and 6(4), respectively) measures.

The CNRP will apply to the riverine and non-tidal part of the Cleddau Rivers SAC, and the tidal element of the Pembrokeshire Marine SAC in Pembrokeshire. This will include all hydrologically linked tributaries. Rivers that are not hydrologically linked to the Cleddau catchment will not be covered in this CNRP. It will be a local recovery plan. The aim is to deliver sufficient reductions in nitrogen and phosphorus loadings into the catchments for the SACs to recover.

The CNRP will identify additional measures to secure improving status of the SACs. Those measures under Articles 6(3) and 6(4) must not compromise works to restore the SACs under Articles 6(1) and 6(2) which are ongoing and do not have to be achieved before an integrated approach is in place.

All identified measures need to be secure, and they will be timed, costed, quantified, allocated and approved. Clear implementation milestones will be presented.

There are currently three phases to the CNRP work. In Phase 1, NRW will calculate the catchment's nutrient reduction capacity and collate NRW actions, such as agriculture pollution control, wastewater treatment works permit reviews, and wider catchment activities. The output of phase 1 will be a high-level interim action plan.

Phase 2 will add secure actions from the Council and other stakeholders, including partnership work. It is anticipated that Phase 2 work will be delivered in parallel with Phase 1, simultaneously.

Phase 3 will provide a more detailed analysis, identifying any gaps and further actions, to be prepared within 12 months (by April 2027). A potential fourth phase may follow with more actions, dependent upon progress with earlier phases.

Whilst the CNRP is at an early stage, NRW are committed to delivering this work and confident that the integrated approach can be developed alongside the LDP. NRW added they are satisfied with the Pembrokeshire LDP approach of applying nutrient neutrality as a backstop measure alongside a policy caveat approach in the Plan.

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?

NRW explained that Phases 1 and 2 of the CNRP are anticipated to be complete by October 2026. It will contain an action plan setting out actions, responsible parties and delivery timescales. Phase 3 is expected to be complete by April 2027.

The Council reiterated their commitment to work with NRW in bringing Phases 1 and 2 forward by October. The CNRP work will also consider whether a threshold approach can be applied in Pembrokeshire.

The CNRP will set out a long-term integrated approach with milestones and secure mitigation measures. The Council confirmed that the CNRP will cover the LDP Plan period and its growth assumptions.

NRW explained that the CNRP will incorporate all known nutrient actions that are secure and include delivery milestones. Mitigation will be aligned with LDP milestones. This work would be happening anyway, but it now needs to be integrated with the LDP.

The CNRP will take forward information from the Nutrient Management Plan, including costs and timescales.

If there are delays with producing the CNRP, NRW explained that it should not prevent measures coming forward. Development proposals can defer to the policy caveat approach, based on nutrient neutrality principles. The Council added that applicants are increasingly aware of nutrient neutrality requirements when preparing applications.

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

The Council consider that nutrient neutrality is a viable backstop, should it be required. Two elements were mentioned; a nutrient credit scheme which is being considered in Pembrokeshire, with a report to Cabinet outlining next steps due soon; and bespoke arrangements from applicants, having regard to the recently published Developer Marine and Estuarine Dissolved Inorganic Nitrogen Mitigation Handbook. The Council maintain that both approaches avoid revisiting viability issues.

The Council explained that financial contributions are considered under the integrated approach. An allowance has already been included in the LDP viability evidence (£1,500 per dwelling for Sustainable Drainage Systems). Measures could include employing enforcement officers, an option suggested in the recent Welsh Government guidance prepared by DTA

Ecology (9 March 2026) and that document also refers to examples in England of delivering mitigation for recreational pressure.

NRW said that Phase 1 will include secured and costed measures, whereas Phase 3 will set out contributions from a wider range of mitigation measures.

The Council recognise that restrictions on pooling financial contributions needs further consideration with stakeholders including NRW, to understand how different approaches could be dovetailed. Restoration measures are not necessarily delivered through planning permissions since they are ongoing, thereby giving greater flexibility on pooling resources.

Ongoing work by the Council on a County Farm Study could identify further mitigation measures, together with preparation of a nutrient credit scheme. Further details are to be published in the autumn, through a Cabinet report outlining recommendations to take forward.

The Council attribute significant weight to the Welsh Government's Position Statement. Work on the CNRP, together with updates to the Habitats Regulations Assessment (HRA), can inform preparation of Supplementary Guidance to provide further details on the integrated approach. This is an appropriate approach to capture further detail which may be unknown at the time of the examination, as outlined in the Position Statement. It also aligns with the Welsh Government guidance which enables the pursuit of different mitigation approaches. The Council add that the policy caveat approach, as set out in the proposed new Policy SP12A, explains what should happen where planned improvements are not being delivered.

Welsh Government reiterate that significant weight should be placed on its Position Statement. It is recognised that a lot of viability work has been undertaken. Not all mitigation measures are known yet. Soundness test 3 – will the plan deliver? – is about broadly demonstrating delivery at the plan-making stage.

With just over 7 years of the Plan period remaining, the Council highlight through liaison with applicants and developers, that sites are still coming forward prior to LDP adoption, and the ongoing local work with a move towards an integrated approach, provide assurances on delivery.

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

In the absence of a CNRP, the Council agree that mitigation measures cannot be considered secure in HRA terms. Nutrient Neutrality will be relied upon in the interim period. NRW reiterated that the CNRP will set out the necessary detail and is a pilot approach in Pembrokeshire, intended to be rolled out to other catchments in future.

Policy SP12A will set out an overall approach for each planning application affected by nutrients. The ultimate policy test, and backstop, is that development will not be permitted where there is an adverse effect on site integrity. The Council will prepare an SPG with further details and submit a broad contents list to the examination, following this meeting.

Regarding the HRA derogation steps, the Council maintain that given the scale and geographic scope of the issue, no alternative solutions, in terms of other strategic options, are available. Welsh Government agreed, and any alternative option would likely be unsustainable.

The Council reiterated that the Plan, including its HRA work, complies with relevant plan-making legislation, such that the Welsh Government Position Statement can be given significant weight.

6. Other matters

The Council is keen to utilise a threshold-based approach but is reliant on CNRP work to quantify a threshold-based approach. Further work will establish if such an approach can be applied, alongside revisions to the HRA (a brief is being prepared for consultants to update the HRA addendum later this year).

Whilst the Council referred to proposed changes to Policy SP12A submitted in its recent response (ED15b), it is recognised that additional amendments may be required given the ongoing CNRP work.

7. Next steps

The following action points were agreed during the meeting:

1. Natural Resources Wales (NRW) to submit CNRP presentation to examination library – completed (ED21).
2. NRW to provide written summary of the CNRP work – to include information on work to quantify a threshold position – by 29 June 2026.
3. Council to provide response to Q3 under issue 2 – clarifying how they intend to secure financial contributions towards restoration and improvement of the Special Areas of Conservation, given the pooling restrictions that exist. This includes a response to the first and second parts – is there sufficient certainty those contributions could be secured; and if not, might those be changed and is there a timescale for this? – by 29 June 2026.
4. Council to provide summary of proposed Supplementary Planning Guidance (SPG) which will link to and provide further details on implementation of Policy GN47 / SP12a – to include a summary of contents, proposed chapters/headings, and timescale for preparation, consultation, and adoption of SPG – by 29 June 2026.
5. (Added after the meeting) Council to provide an update on its nutrient trading proposals – when it intends to take a report to cabinet/committee, and a summary of what this will contain including any future targets/milestones – by 29 June 2026.

The Inspector advised that he would write to the Council with a decision on how the examination should proceed after receiving the action points responses. The meeting closed at 12.50.