

Action Point No.4 Exploratory Meeting Pembrokeshire Local Development Plan 2 16th June 2026 Outline of Supplementary Planning Guidance in Support of Policy GN 47/ Policy 12 A Water Quality and Protection of Water Resources√

Content / Component	Based on the Mitigation Action Plan expectations
Purpose	Demonstrate that LDP policies and development proposals will not adversely affect SAC integrity.
Role in planning system	Supports primarily Local Development Plan Policy GN 47/Policy SP12A Water Quality and Protection of Water Resources - caveat approach
Level / scale	Typically plan-level (LDP) informed by the latest version of the CNRP(s) for the relevant catchments.
Certainty required	Will include measures, providing sufficient confidence to support a threshold and/or integrated and/or the continued use of the nutrient neutrality approach in affected catchments or sub catchments - mapped. Demonstrate deliverability options through nutrient credit scheme or bespoke measures where necessary. Ensure measures are enforceable (use of S106/conditions). Acknowledge that any measures required and resulting mitigation required for development identified will be reviewed annually as part of the Annual Monitoring Reporting exercise for the Local Development Plan.
Baseline / evidence – summary	Includes: understanding of baseline conditions taken from the relevant CNRP(s).
Assessment of impacts	Estimate of nutrient impacts from development (plan proposals). LDP 2 adopted Trajectory with accompanying nutrient budget updated annually under the Annual Monitoring Report.
Existing measures summary	Identify existing and planned measures that will deliver improvements and avoid deterioration. (taken from and updated by the CNRP(s))
Future measures / actions summary	Identify future improvements required, including potential mitigation actions and developer contributions (taken from and updated by the CNRPs).
Integration with CNRP(s) plans	Must demonstrate alignment with CNRP(s) , avoiding repetition.
Mitigation approach - summary	Identifies mitigation where required , including developer contributions linked to nutrient neutrality or with an integrated approach linked to wider restoration actions. In an integrated

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	approach developer contributions will increase scale or speed up delivery of planned restoration measures. (CNRP(s))
Developer contributions	Sets out indicative contributions and funding assumptions for mitigation – Developer Contribution Scheme(s) DCS(s) relying on the CNRP(s).
Delivery mechanisms	Must identify how measures are secured , including legal/financial mechanisms where known.
Phasing / trajectory	Reflects adaptive management framework (short/medium/long-term actions). Findings of CNRP(s)
Milestones	Should include delivery milestones linked to policy caveat and monitoring. Findings/iterative reviews of relevant CNRPs . Milestones would relate to points at which a change in the WG stepped approach¹ is anticipated for the relevant catchment/sub catchment. A change in the stepped approach would also need to be supported by an update to the HRA findings .
Monitoring framework	Requires clear monitoring framework linking development to delivery of mitigation and catchment recovery measures. Linkages to CNRP(s) framework and the Annual Monitoring for the Local Development Plan.
Policy linkage	Directly linked to LDP policies (namely Policy GN 47/SP12 A Water Quality and Protection of Water Resources including policy caveat (permission conditional on progress).
Flexibility / adaptability	Designed to evolve over time as evidence and delivery progress improves.
Outputs / deliverables	Framework demonstrating how mitigation where necessary will be secured and monitored to enable plan policy implementation.

NRW feedback 26th June 2026: Action Point 4 - No issue with principles. We do advise that the approach is kept fairly flexible as detail and approach of CNRP / other mechanisms like trading, as details of these are yet to be fully explored. Again, we can work together on this as things progress.

¹ <https://www.gov.wales/sites/default/files/publications/2026-03/clarification-note-applying-the-tests-of-soundness-to-local-development-plans-ldps.pdf>