Pembrokeshire County Council

Local Development Plan (2017-2033)

Session 3

Thursday 12th November 2026, 10:00am

Water quality and protection of water resources

Hearing Statement

Appendix A is the same document for each Session: It consists of:
Part 1: Policy Edits
Part 2: Minor Edits
Part 3: Proposals Maps Edits
Part 4: Other Edits

October 2026

PEMBROKESHIRE COUNTY COUNCIL

Session/Matter 3 –Water quality and protection of water resources Thursday 12th November 2026, 10:00am	**TN(MD)**
Issue: Does the Plan provide a framework for the protection of water resources and management of development affecting nutrient sensitive Special Areas of Conservation?	
1. Does the Plan spatial strategy and Habitats Regulations Assessment accord with the Welsh Government Interim Planning Policy Statement on Development in Special Areas of Conservation (SAC) Rivers (August 2025)?	
Closed **LPA Response:** The Welsh Government's Interim Planning Policy Statement (SD64)[1] published in August 2025 doesn't refer to the term 'spatial strategy' or to 'settlement hierarchy'. Paragraph 1.3.1 advises: …*This guidance is drafted to facilitate the delivery of development in SAC River catchments affected by phosphorus. Applying this guidance is intended to enable statutory authorities to identify a pathway through which development applications can be determined, taking account of the requirements of the Habitats Regulations in respect of water quality related impacts associated with phosphorus only.* The Habitats Regulation Assessment (Examination Version ED09a to e)[2] was prepared in March 2026 and addressed the Welsh Government guidance available at the time, namely the Interim Planning Policy Statement. It also included an update to the Habitats Regulations Assessment in response to NRW's publication of its condition assessment for the Pembrokeshire Marine SAC which dealt with nitrogen. This updated Habitats Regulation Assessment was supported in principle by NRW. *'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.'* NRW also suggested a proposed edit to proposed new Policy SP12a (formerly Policy GN 47 Water Quality and Protection of Water Resources) and the tidying of referencing to phosphorus and the new Policy SP12a in Appendix D to the Habitats Regulations Assessment. [3]	

[1] https://www.gov.wales/development-special-areas-conservation-sac-rivers-interim-planning-policy-statement SD64
[2] (ED09a) HRA Examination Version
(ED09b) Appendix B & C Screening
(ED09c) Appendix D Policy Rewording
(ED09d) Appendix E Nutrient Management Plans
[3] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12335&language= ED16

Appendix A Part 1 Policy Edits of this Hearing Statement sets out the Matters Arising Changes [6] proposed to reflect the edits required to Local Development Plan 2 to this point in response to the updated Habitats Regulations Assessment (Examination Version ED09a to e)[4].

The edits were supported by NRW. To also note the edits in Appendix A do not include the suggested changes proposed by NRW in its letter of support in principle, but the Council has no issue with making these changes if requested to do so as part of any Matters Arising Change consultation.

From March 2026 the following updates also need to be taken account of in the Habitats Regulations Assessment with consequential edits needed to the text of the Local Development Plan to ensure compatibility with national planning policy and NRW advice:

- the publication of the Welsh Government Clarification Note[5].
- NRW guidance on surface water[6] '*There is a presumption for all developments that rainwater is kept separate from foul wastewater and discharged in line with planning guidance on rainwater disposal. As such, new surface water discharges should not be contaminated with foul water or pollutants. For the purpose of nutrient balance calculations, surface water discharges would therefore not need to be considered as a source of nutrients. However, they may be taken into account for example when considering the potential benefits that could be achieved by utilising SuDS as part of a development proposal.'*
- The publication of NRW's Summary Note of its intention to prepare Catchment Nutrient Recovery Plan[7] (ED23) to support the implementation of the integrated approach by providing the evidence for the improving baseline that new plans and projects can be assessed alongside as part of a competent authority's strategic HRA.

In addition, the Council has been requested by the Inspector to prepare an updated Housing Trajectory for the Local Development Plan 2. (ED 34[8]) which will have a base date for housing land supply of April 2026.

This updated Trajectory, if agreed through Examination, would also require a further update to the Habitats Regulations Assessment and the Local Development Plan text itself. The Plan's trajectory has been amended to take into account the anticipated timescales for the production of the CNRP and the anticipated start of the Pembrokeshire Nutrient Credit Trading Scheme (inviting Expressions of Interest January 2027).[9]

Until Phase 3 of the CNRP has been completed and the appropriate steps to avoid

[4] (ED09a) HRA Examination Version
(ED09b) Appendix B & C Screening
(ED09c) Appendix D Policy Rewording
(ED09d) Appendix E Nutrient Management Plans
[5] https://www.gov.wales/sites/default/files/publications/2026-03/clarification-note-applying-the-tests-of-soundness-to-local-development-plans-ldps.pdf SD106
[6] https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-special-areas-of-conservation/?lang=en#
[7] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12394&language= ED23
[8] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12420&language = ED34
[9] Agenda for Cabinet on Monday, 7th September, 2026, 10.00a.m. - Pembrokeshire County Council
https://mgenglish.pembrokeshire.gov.uk/documents/s85507/Strategic%20Nutrient%20Mitigation%20Proposal.pdf?LLL=0

deterioration have been secured (See Catchment Nutrient Recovery Plan Summary Note (ED23)[7] the Plan can rely on the nutrient neutrality approach via the Pembrokeshire Nutrient Credit Scheme and bespoke mitigation brought forward by developers. [10] This will allow development to come forward in line with the Plan spatial strategy in accordance with the Interim Planning Policy Statement (SD64.[11])	
2. Does the Plan evidence demonstrate that an integrated approach is feasible during the Plan period?	
Closed **LPA Response**: Evidence provided by NRW during the Exploratory Meeting (Exploratory Meeting Note (ED22)[12]) stated that a completed CNRP – up to Phase 3 will be available by April 2027. The Catchment Nutrient Recovery Plan Summary Note (ED23[13]) lays out when the CNRP will be completed and states Phase 3 of the CNRP will quantify nutrient reductions and develop a trajectory timeline to reach a "target" reduction. Once this stage of the CNRP is completed its findings can potentially provide a basis for the development of the integrated approach alongside a HRA addendum and supplementary planning guidance. With evidence from the CNRP it is envisioned this HRA addendum and SPG can be completed by the Council in consultation with NRW. Pembrokeshire County Council attended an update meeting on the CNRP on the 20th of October 2026. NRW presented on the Background to the initial findings Catchment Nutrient Recovery Plan, Initial Calculations and Opportunity Mapping. The meeting included a land management discussion and an outline of next steps. The information is embargoed until the end of October 2026. The next steps will include detailed modelling to identify pollution hotspots, interventions to deliver the greatest water quality benefit and outcomes, and the nutrient reduction quantification of measures. This will form part of the final CNRP, which NRW are intending to publish by April 2027 when Phase 3 will be completed.	
3. Does the emerging Catchment Nutrient Reduction Plan (CNRP) provide sufficient detail and assurance that development can be delivered in accordance with the anticipated timescales?	
Closed **LPA Response:** The evidence provided by NRW during the Exploratory meeting and available in The Catchment Nutrient Recovery Plan Summary Note (ED23[13]) states that Phase 3 will be available by April 2027 which could allow an integrated approach to come forward. See also the answer to Question 2 above. An update of the LDP Trajectory has been completed (base date April 2026) in response to an Inspector question outside the Matters Issues and Questions agenda. (ED34[14]) This has taken into account the anticipated start dates of both the Pembrokeshire nutrient credit scheme and the CNRP integrated approach.	
4. Until such time that a CNRP is finalised, what approach and measures will be relied upon to ensure development can come forward in affected areas?	

[10] Agenda for Cabinet on Monday, 7th September, 2026, 10.00a.m. - Pembrokeshire County Council https://mgenglish.pembrokeshire.gov.uk/documents/s85507/Strategic%20Nutrient%20Mitigation%20Proposal.pdf?LLL=0

[11] https://www.gov.wales/development-special-areas-conservation-sac-rivers-interim-planning-policy-statement ED64

[12] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12387&language= ED22

[13] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12394&language= ED23

[14] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12420&language= ED34

Closed

LPA Response:

Local Development Plan 2 can proceed based on the nutrient neutrality approach whilst the CNRP is finalised. NRW advise that the initial findings and evidence provided by the end of October 2026 can be used to demonstrate that nutrient neutrality mitigation will not prevent, hinder or delay restoration of river and marine SACs, and thereby enable an HRA conclusion of no adverse effects to be drawn. Within this nutrient neutrality scenario, which is where the Council currently is operating, there are two main elements:

- A nutrient credit scheme initiated alongside the County Farm Studies approved by PCC Cabinet on the 7th September 2026.[15]
- Bespoke arrangements by applicants and developers using the Nutrient Mitigation Handbook.[16]

County Council farmland, to be used for mitigation, has been identified, the costs assessed and PCC are in the process of securing the mitigation land.

The anticipated start date for advertising for developers' 'Expressions of Interest' for this scheme is January 2027.

In terms of bespoke mitigation proposals brought forward by developers, the mitigation handbook can provide guidance. A range of different measures have been proposed in planning applications including land use change, Sceptic Tank to Package treatment plant upgrades and water efficiency measures. A number of these schemes have had HRA draft sign off and are awaiting S106 agreement approval.

The Council is also preparing a draft S106 Agreement Template to assist applicants with bespoke proposals.

The financial implications of using a Pembrokeshire Nutrient Credit Scheme in a nutrient neutral scenario are set out in the Cabinet Report of Monday 7th September 2026. [17]

The Cabinet report describes how initial estimates for nutrient credits for nitrogen costs sit within the SuDS allowance (est £1,500 per dwelling). It also describes the costings under the scheme being difficult to accommodate (using the approach set out in the Financial Viability Reports done for Examination[18]) in those schemes requiring phosphorous mitigation.

Commentary is also provided in the Cabinet report on the impact of nutrient mitigation requirements on the housing land supply (please note the Cabinet Report relies on the Trajectory update requested by Inspectors with a base date of April 2025. (ED13).[19].

The nutrient mitigation provided by Phase 1 and anticipated from Phase 2 of the Nutrient Mitigation Strategy (Pembrokeshire Nutrient Credit Scheme) can provide nitrogen mitigation for

[15] Agenda for Cabinet on Monday, 7th September, 2026, 10.00a.m. - Pembrokeshire County Council https://mgenglish.pembrokeshire.gov.uk/documents/s85507/Strategic%20Nutrient%20Mitigation%20Proposal.pdf?LLL=0

[16] https://www.carmarthenshire.gov.wales/media/1byngjmp/marine-and-estuarine-din-mitigation-handbook-10-03-26.pdf

[17] Agenda for Cabinet on Monday, 7th September, 2026, 10.00a.m. - Pembrokeshire County Council https://mgenglish.pembrokeshire.gov.uk/documents/s85507/Strategic%20Nutrient%20Mitigation%20Proposal.pdf?LLL=0

[18] https://www.pembrokeshire.gov.uk/objview.asp?object_id=11531&language= SD28

[19] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12298&language= ED13

housing proposed for Years 1 to 3 of the Local Development Plan 2 2025-2028 housing trajectory (ED13).[20] If the Catchment Nutrient Recovery Plan for the Cleddau is not in place by April 2027 then there is a buffer of mitigation available from the Phase 1 and Phase 2 Nutrient Mitigation Strategies until 2028.

For phosphorus, mitigation needs to be location specific and even though Phase 1 and Phase 2 provides for phosphorus mitigation land, it is not all necessarily in the right location for the housing anticipated going forward in the early years of Local Development Plan 2. Additionally, the costs for phosphorus mitigation using the Pembrokeshire Nutrient Credit Trading Scheme would, relying on the assumptions used in the Financial Viability Report 2024, potentially make it unviable for some of the sites proposed unless anticipated S106 funds were reprioritised. Options are however available for affected sites without the need to reprioritise S106 funding assumptions. These are set out in more detail in the Cabinet Report of the 7th of September 2026.

The updated Trajectory (April 2025) (ED13[21]) reflects the anticipated publication date of the CNRP for the Cleddau. For context six sites affected by phosphorus are already programmed (prior to the April 25 update) for delivery beyond 2027 to 2028 which also brings them potentially within the range of the CNRPs[22]. Of the remaining seven sites[23] they are programmed to contribute 51 residential units over the period 2025 to 2028 and accounted for 4% of the total supply (51/1204) programmed to be provided during that period. The Cabinet report advised *that sites could be moved to commence later in the Local Development Plan 2 period from April 2028 onwards when at least the Cleddau Catchment Nutrient Recovery Plan should be in place – six of the sites will be within the Cleddau Catchment Nutrient Plan Recovery Plan area. Site owners may however be able to bring forward bespoke mitigation arrangements in the advance of publication of the Catchment Nutrient Plan* Recovery Plans*. Some developers are already doing this. This matter can be discussed further through the Examination hearings.'*

To note: Since the Cabinet Report was prepared, relying on the Housing Land Supply updated to a base date of April 2025, the LDP Trajectory has had a further update (new base date April 2026) as requested by the Inspector outside the Matters Issues and Questions agenda see Appendix 2 Local Development Plan 2 Housing Components & Trajectory Update Sept 26 (ED34) [24].

This Trajectory with a base date of April 2026 also took into account the CNRP completion (in April 2027) and the start of the credit scheme (in January 2027). In this trajectory: Of the 13 phosphorus affected sites 2[25] are programmed to start delivery in 2027/28 (With an expected delivery of 12 dwellings in 2027/28 and 9 dwellings in 2028/29). The remaining sites are programmed for 2028/29 or later in the plan period. Of the 49 nitrogen affected sites 4[26] are

[20] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12298&language= ED13
[21] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12298&language= ED13
[22] (1)Land at Tan Ffynnon Fields, Cilgerran. (2)South of Bro'r Dderwen Clunderwen. (3)Adjacent to Maesybryn, Llandisllio. (4)Land at Ford Farm, Wolfscastle. (5)South of Robeston Court Robeston Wathen. (6) Between Longstone Court and 62, Station Road Letterston . (2) Land at Dungleddy Court Clarbeston Road (3) West of Globe Inn Maenclochog (4) Maes Roslyn Maenclochog. (5) NW of Wesley Way Spitta
[23] 1) Old Station Yard Boncath. (2) Land at Dungleddy Court Clarbeston Road (3) West of Globe Inn Maenclochog (4) Maes Roslyn Maenclochog. (5) NW of Wesley Way Spittal (6) Land between Cornerways and Austalise Simpson Cross (7) East of Brookfield Close Keeston
[24] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12420&language= ED34
[25] (1) Land between Cornerways and Austalise,, Simpson Cross (2) Maes Roslyn, Maenclochog (Commitment)
[26] (1) North of The Kilns, Llangwm (2) Land at West End Cottages, Hundleton (3) Sageston Fields, Sageston (4) Kiln Park, Burton Ferry

programmed in 2026/27 (with expected delivery of 41 dwellings in 2026/27 and 6 dwellings in 2027/28) due to extant planning permissions. A further 10[27] sites are programmed to start in 2027/28 (with expected delivery of 151 dwellings in 2027/28).	
5. Does the Plan evidence identify necessary developer contributions that may be needed to improve and restore SACs? Have the impacts of likely costs on development viability been assessed?	
Closed **LPA Response:** As stated in the Exploratory Meeting (see Exploratory Meeting Note[28] (ED22)) the Council has made an allowance for SuDS (est £1,500 per dwelling) in its viability testing. In terms of the integrated approach (with a focus on improvement and restoration) the Council does not know at this point what financial contribution might be expected from NRW's work. Here a decision for preference for spend will need to be taken in partnership with NRW and any other relevant planning authorities in the catchment after the completion of Phase 3 of the relevant CNRP and alongside the updating of the HRA addendum. However, it is useful to note that paragraph 12 of the WG's Clarification Note[29] (SD106) advises that: *'Under the Habitats Regulations there are various pathway through which plans and projects can progress. In general, moving downwards through the pathways means the impacts on development, including financial viability, increase. The Interim Planning Policy Statement adopts a sequential approach towards consideration, and a preference for an integrated approach, to ensure that impacts on development are reduced to the lowest possible level whilst at the same time ensuring deterioration is avoided and restoration achieved.'* Therefore, the Council would expect no greater an amount to be required for an integrated approach than a nutrient neutrality approach and therefore an integrated approach should in principle be viable for at least nitrogen mitigation. It is difficult to specify exact mitigation costs because: ▪ nutrient credit markets and bespoke mitigation methods are still developing ▪ mitigation supply may vary by catchment ▪ national guidance and case law continue to evolve ▪ NRW's Catchment Nutrient Recovery Plans are being drafted and will be updated. They are inherently dependent on monitoring new evidence emerging on the condition of SACs in relation to nutrient pollution. Local Development Plan 2 will need to handle uncertain nutrient-mitigation costs through flexible, criteria-based policies that acknowledge costs may vary over time while still requiring development to demonstrate neutrality or satisfactory nutrient mitigation at application stage. Uncertainty needs to be acknowledged in policy because although the policies of the Plan are justified by evidence available at this point in time, they must also reflect local circumstances. In this case the local circumstances are that Pembrokeshire is at the beginning of a journey to	

[27] (1) South of Cleggars Park,,Lamphey (2) Adjacent to Brackenhurst, Hill Mountain (3) South of The Crown, Jeffreyston (4) Land between Cornerways and Austalise, Simpson Cross (5) Land N of Cleddau Bridge Hotel, Pembroke Dock (6) Green Haven, Monkton, Pembroke (7) South of Tinker's Fold, Cosheston (8) Leven Close, Hook (9) Maes Roslyn, Maenclochog (10) Barnlake Point, Barnlake

[28] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12387&language= ED22

[29] https://www.gov.wales/sites/default/files/publications/2026-03/clarification-note-applying-the-tests-of-soundness-to-local-development-plans-ldps.pdf SD106

resolve issues of nutrient pollution in two SACs in the County. Flexibility is justified to recognise cost variability without undermining the plan's strategy.

The suggestion is to insert the text below at the end of the main policy wording in Policy GN 3 Infrastructure and New Development. The policy needs to acknowledge cost uncertainty regarding nutrient mitigation whilst still requiring that there is no adverse effect on the integrity of SACs.

Policy GN 3 already advises: **The viability of a development will be a key consideration when securing planning obligations and dispensation may be allowed in certain circumstances where there is clear evidence that the development would not be viable.**

It is proposed that this text be added to the end of the bold Policy wording:

Development that would result in additional nutrient loading to designated nutrient sensitive water bodies (described in SP12a) must demonstrate there is no adverse effect on the integrity of the SAC through proposed mitigation measures to be agreed with the Council. The Council recognises that the cost of mitigation measures may vary over the plan period due to changes in market availability of nutrient credits, the cost of bespoke mitigation proposals, and changes in regulatory requirements. Mitigation may be delivered through on-site or off-site measures, strategic mitigation schemes, or financial contributions. Where an applicant wishes to demonstrate that the development proposals cannot achieve the Plan's requirements under Policy GN 3 Infrastructure and New Development, alongside ensuring the proposal does not result in adverse effects on site integrity, applicants must provide up-to-date evidence of mitigation costs, using the most current methodology for nutrient mitigation endorsed by Natural Resources Wales. <u>The applicant must demonstrate how alternative less expensive mitigation measures have been investigated and are unavailable or impractical.</u>[30]

It is also proposed to add the text below acknowledging uncertainty by adding a new paragraph at the end of reasoned justification:

'The Council recognises that nutrient-mitigation markets are emerging and that costs may fluctuate. The plan therefore adopts a flexible approach, allowing applicants to use the most up-to-date cost evidence rather than relying on fixed tariff assumptions where such mitigation measures are not available at the time of application. <u>The applicant must demonstrate how alternative less expensive mitigation measures have been investigated and are unavailable or impractical</u>. This approach ensures the plan remains deliverable while maintaining compliance with the Habitats Regulations.'

The Council would welcome the Inspector's view on these suggested changes.

6. Do the proposed changes to Policy GN 47, including the creation of a new strategic policy (SP12A), provide sufficient detail to conclude that a policy framework exists to prevent adverse effects on the integrity of affected SACs?

Closed

LPA Response:

As advised in response to Question 1 above the changes proposed to Policy GN 47

[30] To note additional sentence added post sign off of Slade Lane Statement of Common Ground under Session 8 by the Council shown underlined .

(SP12A) in terms of nutrient neutrality and the alterations to other Plan policies to protect water quality (as listed in the HRA (Examination Version ED09a[31])) were a product of the mitigation requirements of the HRA (focusing primarily on the Interim Planning Policy Statement requirements) and were approved in consultation with NRW in terms of its findings of no adverse effect on site integrity.

Also as advised under Question 1, from March 2026 the following updates could also be taken account of in an updated Habitats Regulations Assessment with consequential edits needed to the text of the Local Development Plan to ensure compatibility with national planning policy and NRW advice:

- the publication of the Welsh Government Clarification Note[32].
- NRW guidance on surface water[33]

The publication of NRW's Summary Note of its intention to prepare Catchment Nutrient Recovery Plan[34] to support the implementation of the integrated approach by providing the evidence for the improving baseline that new plans and projects can be assessed alongside as part of a competent authority's strategic HRA.

In addition, the Council has been requested by the Inspector to prepare an updated Housing Trajectory for the Local Development Plan 2. (ED34)[35] which will have a base date for housing land supply of April 2026.

This updated Trajectory, if agreed through Examination, would also require a further update to the Habitats Regulations Assessment and the Local Development Plan text itself. The Plan's trajectory has been amended to take into account the anticipated timescales for the production of the CNRP and the anticipated start of the Pembrokeshire Nutrient Credit Trading Scheme.[36]

Although we should not prejudge the finding of an updated HRA under CNRP the integrated approach would be based around a policy caveat approach, so development will only be able to proceed under an integrated approach if measures are in place to prevent adverse effects on site integrity.

The guidance from NRW, DTA and Welsh Government (on which the policy amendments would need to be based) and the approved HRA addendum alongside Supplementary Planning Guidance should provide sufficient assurance that they can provide a framework to prevent adverse effects on the integrity of the affected SACs.
No further changes are proposed at present as this matter will need further discussion at Examination.

[31] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12280&language= ED09a
[32] https://www.gov.wales/sites/default/files/publications/2026-03/clarification-note-applying-the-tests-of-soundness-to-local-development-plans-ldps.pdfSD106
[33] https://naturalresources.wales/guidance-and-advice/business-sectors/planning-and-development/advice-for-planning-authorities/advice-to-planning-authorities-for-planning-applications-affecting-phosphorus-sensitive-special-areas-of-conservation/?lang=en#
[34] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12394&language= ED23
[35] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12420&language= ED34
[36] Agenda for Cabinet on Monday, 7th September, 2026, 10.00a.m. - Pembrokeshire County Council https://mgenglish.pembrokeshire.gov.uk/documents/s85507/Strategic%20Nutrient%20Mitigation%20Proposal.pdf?LLL=0

7. Are further amendments to the Plan necessary as a result of the latest evidence?	
Closed **LPA Response:** See above for Question 6.	
8. Is reliance on the production of Supplementary Planning Guidance to provide further detail on measures, mitigation, developer contributions and delivery, reasonable as a measure to conclude there would be no adverse effect on site integrity?	
Closed **LPA Response:** In terms of the Integrated approach the GN 47 (SP12A) Policy can be amended to accord with the Interim Planning Policy and Welsh Government Clarification Note which would include a policy caveat on the integrated approach. Supplementary Planning Guidance would support Local Development Plan Policy GN 47/Policy SP12A Water Quality and Protection of Water Resources. Decisions would still have to be made in accordance with Plan policy. Once Phase 3 of the CNRP has been completed a further HRA addendum, based on its conclusions, will be required to decide whether a threshold, integrated or nutrient neutral approach or a combination of approaches based on catchment areas is appropriate – dependent on condition of the catchments and restoration coming forward. Supplementary Planning Guidance (ED 25) [37] on the integrated approach will be based on this HRA addendum and will provide guidance on developer contributions and refer to restoration targets and timescales for measures. Ongoing monitoring of the CNRP and its timeline of measures will be required to ensure which approach is still appropriate. Again, to re-iterate, any individual proposal will also still be subject to a project level HRA and subject to Policy SP 12A.	
9. Does the Plan's monitoring framework provide the necessary assurances to ensure the above measures are brought forward?	
Closed **LPA Response:** The Plan's Appendix 4 monitoring framework will require amendment to include reference to an ongoing monitoring requirement for the integrated approach set out in the CNRP/s. The LDP2's Annual Monitoring Report should, with reference to the CNRP/s monitoring, provide the Council's position regarding the policy caveat approach and the CNRP/s monitoring outcomes, i.e., whether from the date of the AMR the position for the Council is one of nutrient neutrality or integrated or threshold. This may also be sub- catchment specific or a combination of these approaches. The LPA would also have to respond to any announcements by NRW to change course during the annual monitoring period.	

[37] https://www.pembrokeshire.gov.uk/objview.asp?object_id=12391&language= ED25