

Marine Nitrates Development Taskforce – Meeting 4 6 November 2025

1. Overall Summary

The fourth meeting of the Taskforce focused on ensuring that actions underway are progressing at pace and that any blockages are escalated and resolved. It also focused on reviewing the impact of steps taken so far, the development of essential tools for mitigation, and identifying areas for potential future support.

2. Action log and progress review

There was a systematic update of the action log and progress against the items pursued or outstanding. These are updated below on a per item basis.

3. Nutrient Credit Trading Group:

The first meeting of the Nutrient Credit Trading Group had met this morning (6 Nov) and a positive update was provided. The meeting is consciously using examples from elsewhere – including England – to ensure lessons learned on both best practice and potential pitfalls to inform Wales' approach.

The Nutrient Credit Trading Group is a medium-term response piece, and it is anticipated that it will be 9-12 months before nutrient credit trading is up and running in a way that provides developers with a sustainable way to demonstrate mitigation for developments in affected SACs.

ACTION: A note from the Nutrient Credit Trading Group to be provided the Taskforce

ACTION: Planning and Environment Decisions Wales to have a standing invitation to the Nutrient Credit Trading Group.

4. Natural Resources Wales FAQs

It was noted that a combined query list from local authorities is in the final stages and will be submitted to Natural Resources Wales shortly. Natural Resources Wales encouraged this information to be sent as soon as possible so it could make a start in resolving any queries.

The FAQs are iteratively updated and should be viewed as a 'live' document that is also being informed by ongoing engagement, particularly through the case-by-case meetings.

ACTION: Local Planning Authorities to send through their queries on the FAQs document to Natural Resources Wales.

5. Business Support Report & Communications:

The one-pager signposting potentially affected businesses to support has been produced by the Welsh Government and circulated prior to the meeting. Contact addresses have also been added, with local authorities encouraged to provide updated details as quickly as possible so the form can be translated and issued next week.

No significant increase in business distress signals reported was reported but there was discussion about displacement of development, with some reports that bigger developers are moving from affected SAC areas to other areas.

ACTION: Local Planning Authorities to provide contact details to the Welsh Government so the business support signposting can be made available.

ACTION: Welsh Water to provide the intelligence it shared with the meeting in writing.

ACTION: All members to provide updates on any displacement activity from developers as they become aware of it.

There was discussion of the significant engagement taking place with developers. The one-pager would be circulated to previously communicated groups and an offer was extended for Welsh Government officials from the More Homes division to attend the next developer forums where the issue may be discussed.

ACTION: Business support one-pager to be disseminated through established networks.

ACTION: Local authorities to extend invitations to Welsh Government More Homes officials to attend the next round of key sector / developer engagement events if of benefit. The Welsh Government also to update Home Builders Federation/Community Housing Cymru following each Taskforce.

ACTION: The Welsh Government to invite the Home Builders Federation to submit a paper to the Taskforce and attend to discuss the impact on the sector and perspective on mitigations.

6. Local Development Plan Progress

A short update was provided, noting that actions previously agreed were still progressing. Carmarthenshire local authority was at an advanced stage with its Local

Development Plan and noted that the policy caveat was of lesser value to it than a letter from the Welsh Government setting out the approach to inspectors.

ACTION: *The Welsh Government to consider bringing forward the clarifying letter, ahead of the policy caveat finalisation.*

7, Legal Route & Imperative Reasons of Overriding Public Interest

An update on the legal position was provided, noting that consideration is ongoing with Ministers but no viable option for legislative change has been identified.

It was clarified that Imperative Reasons of Overriding Public Interest (IROPI) is available and has precedent but requires robust justification. Local authorities are considering how to take that forward, including through test cases, but it is not simple legislation to apply. Pembrokeshire local authority is working through the application of IROPI as an example using DTA consultants.

The Welsh Government clarified that ministers support Local Planning Authorities using the full toolkit available, but it was noted that IROPI cases must be determined on a case-by-case basis, with the Welsh Government having a role in approving the derogation.

8. Nutrient Calculator

An update on the progress of the Nutrient Calculator was provided. It is still on time but there was some complication due to the updated agricultural statistics and updates to statistical software. An escalation reminding those involved of the urgency was agreed.

ACTION: *Chair of the Taskforce to write to relevant people supporting the nutrient calculator, reminding them of the need to treat the development as a top priority.*

9. Gowerton and Llanelli Treatment Works

Progress was reported on understanding the impact of nitrate stripping at treatment works. The water treatment facilities at Gowerton and Llanelli strip nitrogen, removing the total levels by up to 80%. This does not make developments discharging through those works nutrient neutral, but does mean the mitigation required to offset is lower.

ACTION: *Natural Resources Wales to circulate a note that clarifies the practical implications of the position at the two works. If this note does not fully address the queries from Swansea and Carmarthenshire, Natural Resources Wales offered to follow up.*

10. Local Authorities Roundtable Updates

Each Local Authority present provided updates on work, noting the success of screening out applications on a case-by-case basis with a view to holding combined meeting with Natural Resources Wales in the new year.

Some developments signed off include significant implications for jobs, and Pembrokeshire Coast National Park recently signed off a site with 90 affordable homes as it discharges outside the catchment area. Carmarthenshire had had 241 applications on hold and had reduced this number by 60.

It was noted that the process also revealed development which could not be screened out. These developments would require mitigation measures to achieve nutrient neutrality. These tactical measures were the key to progressing development now and was where the focus needed to be. There would be different options available to each Local Authority but the starting point was to understand the amount of nutrients which needed to be balanced for each development, what different mitigation measures might offer and then securing those within the relevant catchment. Nutrient trading would offer an ongoing mechanism to secure mitigation in future. The third area would be a more strategic and long-term approach which moved the SACs back into favourable condition.

ACTION: Local authorities all agreed to provide updated projections on the impact following the steps of the Taskforce to this point.

ACTION: Natural Resources Wales to provide an update to local authorities on treating applications that discharge outside the catchment areas.

11. Lessons from Solent/Wiltshire:

Visits to the above have informed the Nutrient Credit Trading Group discussed earlier. It was noted in particular how important it was to engage farmers and market operators, including showing them the potential commercial benefits of credit trading. English schemes offered practical insights, but it was noted that some legal/regulatory differences exist. This is notably the case in CIL regulations, which have been discussed previously as well as at the Nutrient Credit Trading Group. The credit trading platform will not provide solutions for applications currently held up but will be a key tool for medium term mitigation.

It was noted that each local authority's response to shorter term / tactical solutions to current applications would be different and would draw on a suite of actions within an overall local authority plan. For example, Pembrokeshire local authority may use county farms as a authority-wide mitigation. Finalising these solutions by each local authority could be significantly expedited once the nutrient calculator being produced

by the Welsh Government and the guidance being developed and shared by Carmarthenshire local authority were in place in the coming weeks.

ACTION: *Taskforce and Welsh Government officials to support local authorities on their development of approaches that may provide mitigation for currently paused development and be delivered quickly.*

12. Communication and Engagement

The meeting closed with a reminder that information shared at the taskforce should be escalated to leadership at all levels for all participating organisations. The minutes and actions would be provided more quickly for dissemination.

ACTION: *Communications officials to consider a Comms Plan for use when the guidance and nutrient calculator are in place. All attendees to consider messaging that provides confidence to developers about the pace and impact of activity.*

Action	Owner	Date
A note from the Nutrient Credit Trading Group of the first meeting to be provided to the Taskforce	<i>[information redacted]</i>	13 November
Planning and Environment Decisions Wales to have a standing invitation to the Nutrient Credit Trading Group	<i>[information redacted]</i>	13 November
Local Planning Authorities to send through their queries on the FAQ document to Natural Resources Wales	<i>[information redacted]</i>	13 November
Welsh Water to provide the intelligence on developer displacement that it shared with the meeting in writing.	<i>[information redacted]</i>	7 November
Local Planning Authorities to provide contact details to the Welsh Government so the business support signposting can be made available.	<i>[information redacted]</i>	13 November
All members to provide updates on any displacement activity from developers as they become aware of it.	<i>[information redacted]</i>	Ongoing
Business support one-pager to be disseminated through established networks.	<i>[information redacted]</i>	When finalised
Local authorities to extend invitations to Welsh Government More Homes officials to attend the next round of key sector / developer engagement events if of benefit. The Welsh Government also to update Home Builders Federation/Community Housing Cymru following each Taskforce.	<i>[information redacted]</i>	Ongoing

The Welsh Government to invite the Home Builders Federation to submit a paper to the Taskforce and attend to discuss the impact on the sector and perspective on mitigations.	<i>[information redacted]</i>	13 November
The Welsh Government to consider bringing forward the clarifying letter, ahead of the policy caveat finalisation.	<i>[information redacted]</i>	14 November
Chair of the Taskforce to write to relevant people supporting the nutrient calculator, reminding them of the need to treat the development as a top priority.	<i>[information redacted]</i>	10 November
Natural Resources Wales to circulate a note that clarifies the practical implications of the position at the two works. If this note does not fully address the queries from Swansea and Carmarthenshire, Natural Resources Wales offered to follow up.	<i>[information redacted]</i>	14 November
Local authorities all agreed to provide updated projections on the impact following the steps of the Taskforce to this point.	<i>[information redacted]</i>	12 November
Natural Resources Wales to provide an update to local authorities on treating applications that discharge outside the catchment areas.	<i>[information redacted]</i>	21 November
Taskforce and Welsh Government officials to support local authorities on their development of approaches that may provide mitigation for currently paused development and be delivered quickly.	<i>[information redacted]</i>	Ongoing

Communications officials to consider a Comms Plan for use when the guidance and nutrient calculator are in place. All attendees to consider messaging that provides confidence to developers about the pace and impact of activity.	<i>[information redacted]</i>	21 November
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Attendees

Welsh Government

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- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*
- *[information redacted]*

PEDW

- *[information redacted]*

Local Authorities

- *[information redacted]* – Swansea
- *[information redacted]* – Carmarthenshire
- *[information redacted]* – Neath Port Talbot
- *[information redacted]* – Carmarthenshire

Pembrokeshire National Park

- *[information redacted]*

Dŵr Cymru Welsh Water

- *[information redacted]*
- *[information redacted]*

Natural Resources Wales

- *[information redacted]*
- *[information redacted]*