

Eluned Morgan MS, First Minister  
Huw Irranca-Davies MS, Deputy First Minister and Cabinet Secretary for Climate Change and Rural Affairs.  
Jayne Bryant MS, Cabinet Secretary for Housing and Local Government  
Rebecca Evans MS, Cabinet Secretary for Economy, Energy and Planning  
Via email

17 October 2025

## **Marine Special Area of Conservations (SAC) Nitrates: Impact on the delivery of new homes**

Dear Ministers,

Further to the letter from Jayne Bryant MS, Cabinet Secretary for Housing and Local Government, on 13 October, I am writing to raise the cross-portfolio issue of nitrates, which carries significant implications for housing delivery and employment in southwest Wales.

HBF, alongside Persimmon, Bellway and Barratt Redrow, is committed to working constructively with the Welsh Government, Natural Resources Wales (NRW), local authorities, and other stakeholders to find a positive way forward regarding this matter. We fully recognise the importance of protecting and enhancing the natural environment, and we share the Welsh Government's ambition to deliver both environmental improvement and the new homes communities urgently need. Our intention is not only to highlight the barriers to delivery, but also to play an active and positive role in shaping a solution that balances environmental priorities with the need for housing and associated jobs.

We are therefore deeply concerned about the practical impact of what is, in effect, a moratorium on housebuilding within the Burry Inlet catchment for the foreseeable future. Current restrictions linked to the Marine SAC risk are preventing the delivery of thousands of much-needed homes and threatening hundreds, if not thousands, of associated jobs. This issue affects not only home builders, but also the wider development community, housing associations, and local authorities striving to meet housing need.

While we support the Welsh Government's commitment to improving water quality, we believe that NRW's current approach risks disproportionately affecting much-needed housing development. For Persimmon, 2,000 planned homes are now at risk – including 400 new affordable social properties; for Bellway, 600 homes; and for Barratt Redrow David Wilson South Wales, 400 homes, including 86 new affordable homes – with significant knock-on effects for the supply chain and local contractors. More broadly, this approach will undermine the ability of the Welsh Government and local councils to meet their affordable housing targets in both the short and long term.

We note that the Planning Officers Society Wales (POSW) has already raised concerns with the Welsh Government's Chief Planning Officer, highlighting "operational, technical, and resourcing problems" with NRW's approach, and its serious impact on both local authorities and the development sector.

The home building industry is eager to be part of the solution. We have direct experience from other parts of the UK where similar challenges have arisen, and solutions have been implemented. We are ready to work constructively with NRW and other stakeholders to help develop a practical, proportionate way forward. To make this possible, we would ask the Welsh Government to:

- Ensure that, while discussions regarding the Loughor Estuary and other Marine SACs in North and West Wales are ongoing, the scope of these considerations is not extended to include additional marine areas

elsewhere in Wales.

- Ensure representation of the home building industry on any taskforce established to address this matter. We understand from the Cabinet Secretary for Economy and Planning's response to Cefin Campbell MS on 1 October that such a taskforce has been established.

Our shared objectives – protecting water quality, supporting jobs, and ensuring local families have access to the homes they need – are not mutually exclusive. With the right approach, we believe they can be achieved together. We would welcome the opportunity to work alongside the Welsh Government and NRW to find a balanced and deliverable solution.

We look forward to your response and to engaging constructively in this important policy area, which carries significant implications for jobs, housing, economic growth, and the wider environment.

Yours Sincerely



Mark Harris  
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