



Llywodraeth Cymru
Welsh Government

Integrated Sustainability Appraisal of the Strategic Planning Guidance for the Gwent Levels National Natural Resource Area (Future Wales Policy 9)

Draft Environmental Report

Welsh Government: Consultation Version 17th February – 31st March 2026

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1. Introduction

1.1 Background to the Gwent Levels Planning Guidance

- 1.1.1. Policy 9 of Future Wales: The National Plan 2040 identifies the Gwent Levels as one of nine National Natural Resource Areas (NNRA) across Wales. The Welsh Government is currently consulting on the pilot planning guidance on the Gwent Levels which will be strategic planning guidance for the Gwent Levels National Natural Resource Area. This pilot planning guidance will help deliver the requirements of Policy 9 by identifying and safeguarding resilient ecological networks (REN) across the Gwent Levels landscape. More information on the planning guidance is available on the [Welsh Government website](#).
- 1.1.2. The planning guidance aims to assist with reversing the decline of as well as facilitating the enhancement of biodiversity and the resilience of biodiversity and ecosystems across the Gwent Levels landscape. As a result, the guidance will have a role in influencing future land-use on the Levels and therefore, it is important that we have a comprehensive understanding of both the positive and adverse effects this guidance could potentially have on social, economic, environmental and cultural factors that are specific to the Levels. In order to understand these potential effects and to ensure that the draft planning guidance is robust, meaningful, and aligned with statutory requirements, we have produced in tandem an Integrated Sustainability Appraisal (ISA). The ISA provides a process which demonstrates what consideration has been given to the contribution that the guidance can potentially make to Wales's seven national well-being goals, and that it embeds within it the principle of sustainable development, provided for by the Well-being of Future Generations (Wales) Act 2015. This ISA is based on a comprehensive evidence base approach and aims to ensure that the guidance appropriately takes into account social, economic, environmental, and cultural factors specific to the Levels.

1.2 What is the Gwent Levels Pilot Planning Guidance?

- 1.2.1 The Gwent Levels comprise a large area of reclaimed estuarine alluvium between the Rivers Rhymney and Wye in southeast Wales, collectively known as the Gwent Levels. The land is intersected by a network of reens that are managed by NRW and smaller field ditches that are responsibility of the landowner. The draft Guidance contains mapped extent of the Gwent Levels for the purposes of the Guidance and also therefore for the purposes of this draft Environmental Report. The mapped area is referred to as the Gwent Levels National Natural Resource Area.

- 1.2.2 The Gwent Levels has many statutory and non-statutory designations at the Welsh, UK and European level for its biodiversity, landscape and historic landscape. With these designations in mind, the Levels play a crucial role, both regionally and nationally, in climate change adaptation and mitigation and in addressing the nature emergency. The Levels also provide important supporting habitat to protected sites including the Severn Estuary, Wye and Usk Special Areas of Conservation (SACs) and the Severn Estuary Special Protection Area (SPA), Ramsar Site and Site of Special Scientific Interest (SSSI).
- 1.2.3 In spite of these protective designations, the Gwent Levels continues to be vulnerable to development (including energy schemes) largely due to its location between the heavily populated urban areas of Cardiff and Newport, its flat topography, good infrastructure and grid connectivity and capacity and lack of consistent long-term appropriate land management. The degradation and fragmentation of the Levels from development, and some management practices, could impact negatively on the ability of the SSSIs on the Gwent Levels to perform their intended ecological function thus contributing to an overall loss of biodiversity and ecosystem and climate resilience.
- 1.2.4 A Ministerial commitment was made in the Summer 2021 for the Welsh Government officials to work with partners and stakeholders on a pilot project to prepare national planning guidance for the Gwent Levels. The Levels is identified in Policy 9 of Future Wales: The National Plan 2040, as a NNRA and the guidance will help deliver the requirements of Policy 9 to safeguard and create resilient ecological networks.
- 1.2.5 Once published, the guidance should be applied alongside Future Wales and Planning Policy Wales (PPW) and in the preparation of strategic and local development plans and in the determination of planning applications on the Gwent Levels.

1.3 Purpose of the Integrated Sustainability Appraisal (ISA) Scoping Report

- 1.3.1 This assessment has been undertaken by adopting a precautionary approach to the need for a Strategic Environmental Assessment (SEA). Officials considered : Application of the SEA Directive to Plans and Programmes in '[A Practical Guide to the Strategic Environmental Assessment Directive](#)' and concluded it was highly likely the Directive required an SEA of the guidance.
- 1.3.2 The Welsh Government has decided to integrate other assessments it undertakes as an organisation in producing its plans, projects and workstreams into the SEA process. Some of those assessments are statutory, including health, Welsh language, Children's Rights and equalities impact assessments and the Welsh Government has therefore undertaken an ISA to combine all these assessments into one document.

1.4 What is an Integrated Sustainability Appraisal (ISA)?

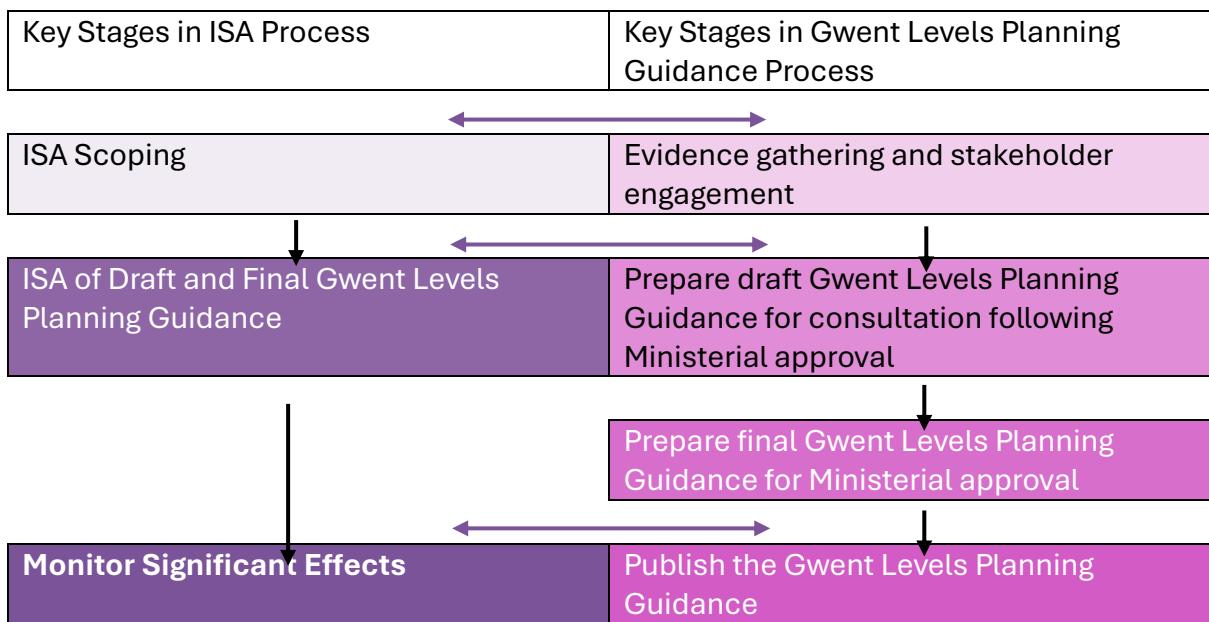
Sustainability Appraisal (SA) / Strategic Environmental Assessment (SEA)

- 1.4.1 A Sustainability Appraisal (SA) is a process for assessing the environmental, social, cultural and economic impacts of the Gwent Levels planning guidance ("the guidance") and aims to ensure that sustainable development is at the heart of preparing the guidance. To avoid unnecessary confusion and duplication, the SA for the purposes of this guidance incorporates the legal requirements of the SEA, and thus throughout this document, reference made to the term 'SA' should also be taken to incorporate the requirements of the SEA Directive and vice versa. The SEA by itself is a process for evaluating the likely environmental effects of the guidance to ensure that environmental issues are integrated and assessed at the earliest opportunity for the decision-making processes for both the ISA framework and the guidance. The SA therefore includes the SEA Directive's specific requirements along with the consideration of sustainability matters more generally.
- 1.4.2 The SA/SEA is an iterative and on-going process and stages and tasks in this process will be revisited, updated or revised as the guidance develops to take account of new or updated evidence as well as consultation responses.
- 1.4.3 Guidance produced by the UK Government (referred to in paragraph 1.3.1) presents a series of prescribed stages for a SEA. These stages are adapted for this ISA to cover more than just environmental issues. Nevertheless, the principles and legal requirements of the SEA Regulations will be upheld, and

this Scoping Report identifies and explains the specific requirements of the SEA Directive that will need to be fulfilled.

1.4.4 Figure 1-1 below illustrates the main stages of the ISA process and how these fit with the process for preparing the Gwent Levels planning guidance.

Figure 1-1 Outline of the ISA and Gwent Levels Planning Guidance Process



1.5 Why are we integrating other assessments?

1.5.1 One of the five ways of working in accordance with the Future Generations (Wales) Act 2015 (see table 1-2) is the need to take an integrated approach to what we do. Given that regard must be had by planning authorities to guidance being prepared for the Gwent Levels, we have sought to integrate our approach to the SA/SEA with other statutory and non-statutory assessments. This allows a more rounded view of the potential sustainability implications and opportunities arising from the guidance.

1.5.2 The following additional statutory and non-statutory impact assessments have been incorporated into the ISA process with further detail provided in Section 1.7:

- Children’s Rights
- Equalities
- Rural Proofing
- Sustainable Land Management (SLM)
- Health
- Economic Development
- Welsh Language
- Climate Change
- Biodiversity.

1.6 Purpose of this ISA report

1.6.1 This ISA report represents the draft stage of the Gwent Levels Planning Guidance (see figure 1-2 below). As this is not the ‘final’ ISA Report, we have cross-referred to some previous ISA outputs such as the Scoping Report, which are required for legal compliance, rather than repeating them here. These will be included in the final version of the ISA Report. The purpose of this consultation is to explain the assessment process, and how this has shaped the guidance to-date. It presents the potential positive and negative effects of the Draft Guidance, to inform the consultation process.

1.6.2 The assessment of the guidance enables a more transparent and robust decision-making process. Recommendations have been made for improvements or alternatives, as appropriate. The collaborative process of working has included meetings and informal review stages to discuss the developing issues. The ISA process has therefore been able to provide the Welsh Government with accurate, robust and transparent information with regards to the sustainability of options (including individually and cumulatively) that has shaped the Government’s decision-making about what to include in the guidance.

Figure 1-2 Stages in the ISA process

Assessments Integrated	ISA Stages
Screening for Children's Rights, Equalities, Rural Proofing, SLM, Health, Economic Development, Welsh Language, Socio-economic, Climate Change, Biodiversity, Justice, Privacy and Environmental Impact Assessment (EIA)	<p>SA/SEA Screening</p> <p>Is a formal SA that fulfils the SEA Regulations required?</p>
<p>Scoping and evidence gathering for each of the following incorporated into each stage of the ISA Scoping:</p> <p>Screening for Children's Rights, Equalities, Rural Proofing, SLM, Health, Economic Development, Welsh Language, Socio-economic, Climate Change and Biodiversity</p> <p>Screened out Justice, Privacy and EIA as set out in paragraph 2.2.7 of this report</p>	<p>Stage A: Scoping</p> <p>A1: Identifying other relevant plans, programmes and environmental protection objectives A2: Collecting baseline information A3: Identifying sustainability problems A4: Developing ISA objectives A5: Consulting on the Scoping Report</p>
<p>Input into developing alternatives and assessing effects for each of the following incorporated into each stage of ISA Stage B through ISA Framework and specialist input:</p> <p>Screening for Children's Rights, Equalities, Rural Proofing, SLM, Health, Economic Development, Welsh Language, Socio-economic, Climate Change and Biodiversity</p>	<p>Stage B: Developing and refining alternatives and assessing effects</p> <p>B1: Testing the Gwent Levels guidance objectives against the ISA objectives B2: Developing strategic alternatives B3: Predicting the effects of the guidance including alternatives B4: Evaluating the effects of the guidance including alternatives B5: Considering ways of mitigating adverse effects and maximising benefits B6: Proposing measures to monitor the effects of implementing the guidance</p>
Assessment of the above to be reported within the ISA Report	<p>Stage C: Prepare draft ISA Report</p> <p>Prepare formal ISA Report and Non-Technical Summary to report findings of ISA of draft planning guidance</p>
Consultation on the above assessments as part of the Draft ISA Report	<p>Stage D: Consultation on draft ISA Report and assessing significant changes</p>

Update assessment of the above as part of ISA of final planning guidance and report in final ISA Report	D1: Consulting on the ISA Report D2: Assessing significant changes made to the final planning guidance and updating the ISA Report D3: Post Adoption Statement and Statement of Particulars
Monitoring the significant effects of the above assessments as part of ISA Monitoring	Stage E: Monitoring the Significant Effects of the Gwent Levels Planning Guidance

1.7 Legislative and non-legislative requirements

1.7.1 Section 1.5 of this report identifies that in addition to the SEA¹, the ISA will integrate a series of impact assessments. The details of the approach to the impact assessments are set out below, this recognises the wider determinants that overlap between the different impact assessments and enables a holistic view to be taken.

1.7.2 Some of the impact assessments are statutory and others are required by the Welsh Government, these are set out below as well as where these requirements have been met:

Statutory Impact Assessments:

1.7.3 **Children's Rights Impact Assessment:** Ministers are required to have due regard to the United Nations Convention on the Rights of the Child when exercising any of their functions. As required by the Rights of Children and Young Persons (Wales) Measure 2011

1.7.4 **Equality Impact Assessment:** The Equality Act 2010 places a General Equality Duty on Welsh public authorities, including the Welsh Government, to have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation, as well as to advance equality of opportunity and to foster good relations between people who share a protected characteristic and those who do not. As required by the Equalities Act 2010

¹ Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001. Transposed into Welsh Law through the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regs)

1.7.5 **Sustainable Land Management (SLM) Impact Assessment:** There is a legal requirement that whenever Welsh Ministers provide support for, or regulate, agriculture, other activities carried out on land used for agriculture, or ancillary activities, they must do so in accordance with the SLM duty. As required by the Agriculture (Wales) Act 2023

1.7.6 **Welsh Language Impact Assessment:** The Welsh Government has a statutory obligation to fully consider the effects of the Welsh Language. This means considering the Welsh language in everything that we do. Considering the impacts, both positive and negative, of our work on the Welsh language and Welsh speaking people and communities. As required by the Welsh language (Wales) Measure 2011 and Standards

1.7.7 **Biodiversity Impact Assessment:** Section 6 in Part 1 of the Environment (Wales) Act 2016 introduced an enhanced Biodiversity and Resilience of Ecosystems Duty (the s. 6 duty) for public authorities (as listed in s. 6(9) of the Act), including the Welsh Ministers, in the exercise of functions in relation to Wales. The s. 6 duty requires that the Welsh Ministers must seek to maintain and enhance biodiversity so far as consistent with the proper exercise of their functions and in so doing promote the resilience of ecosystems. As required by the Environment (Wales) Act 2016

1.7.8 **Habitats Regulations Assessment:** Consideration is being given to the requirements of a Habitats Regulations Assessment (HRA) in preparing The Guidance. This is because its implementation has the potential to influence development and land-use decisions in proximity to several European and internationally designated nature conservation sites. A number of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) fall within its sphere of influence. Under the Conservation of Habitats and Species Regulations, any plan or guidance that may affect the integrity of these sites, either alone or in combination with other plans or projects, must be assessed through the HRA process. The same assessment, as a matter of policy, has also been applied to Ramsar sites.

1.7.9 Although The Guidance does not allocate development, it is expected to shape decision-making in ways that could indirectly affect designated habitats and species, for example through changes to land management, hydrology, water quality, disturbance, or habitat connectivity. As potential effects on SACs, SPAs and Ramsars cannot be ruled out at this stage, preparing The Guidance requires the consideration of HRA to ensure it does not adversely affect the integrity of those protected sites and species.

1.7.10 Work to address the HRA requirements is currently underway and will continue to be undertaken with the involvement of Natural Resources Wales (NRW) to ensure the assessment is robust and compliant with the Habitats Regulations. The outcomes of the HRA process will also influence the final drafting of The Guidance and may lead to changes from this draft version where necessary to meet the requirements of the regulations and demonstrate that there are no adverse effects on the integrity of European and internationally designated sites.

Welsh Government Required Assessments:

1.7.11 **Rural Proofing Impact Assessment:** Rural proofing is a Welsh Government commitment, underpinned by the principles of social justice, sustainability, equality and fairness, and includes action to improve the quality of life for those residing in our Welsh rural communities.

1.7.12 **Health Impact Assessment:** This assessment considers how the health and well-being of a population may be affected by a proposed action, be it a policy, programme, plan, project or a change to the organisation or delivery of a public service.

1.7.13 **Socio-economic Duty Impact Assessment:** The Duty requires Welsh Ministers when taking strategic decisions, to have due regard to the need to reduce inequality of outcomes that result from socio-economic disadvantages.

1.7.14 **Economic Impact Assessment:** This assessment is important to understand the impact of proposed laws, policies and other actions on businesses and across the private, third and voluntary sectors in Wales

1.7.15 **Climate Change Impact Assessment:** It is important for the Welsh Government to consider how a policy will affect greenhouse gas emissions and how changing weather patterns because of climate change could affect its implementation.

1.8 What is the relationship between the Gwent Levels Planning Guidance, the Integrated Sustainability Appraisal and the Well-being of Future Generations (Wales) Act 2015?

1.8.1 The Gwent Levels pilot planning guidance will directly support and implement the requirements of Policy 9 in Future Wales: The National Plan 2040. All public authorities in Wales should have regard to and ensure that decisions and plans are in accordance with the findings, recommendations and

conclusions in the guidance. The ISA is one of the processes through which the guidance will be evidenced and shaped and places sustainable development at its heart.

1.8.2 The Well-being of Future Generations (Wales) Act 2015 gained royal ascent in April 2015. The Act requires that public bodies, including the Welsh Government, carry out sustainable development to improve the well-being of Wales. Sustainable development is defined in the Act as:

“Sustainable development” means the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the sustainable development principle, aimed at achieving the well-being goals.

1.8.3 The Act identifies how public bodies should operate to deliver sustainable development and the process of improving well-being. Whilst there are many things that can determine a person’s quality of life (or well-being), they can be broadly categorised as environmental, social, cultural and economic factors. These factors are captured in the Act’s seven well-being goals and set out in Table 1-1 below:

Table 1-1 Well-being of Future Generations Act Goals

Goal	Brief Description
A prosperous Wales	This goal focuses on a vibrant, innovative, and productive economy that uses resources efficiently and proportionally, with a skilled and well-educated population.
A resilient Wales	This goal emphasises a society that is adaptable to change, including climate change, and that protects and enhances ecosystems.
A healthier Wales	This goal aims to improve and protect the physical and mental well-being of all people in Wales.
A more equal Wales	This goal focuses on creating a society where everyone has the opportunity to fulfil their potential, regardless of background or circumstances.
A Wales of cohesive communities	This goal promotes attractive, viable, safe, and well-connected communities where people feel a sense of belonging.

A Wales of vibrant culture and thriving Welsh language	This goal seeks to promote and protect Welsh culture, heritage, and the language, encouraging participation in arts, sports, and recreation.
A globally responsible Wales	This goal ensures that Wales considers the impact of its actions on global well-being, contributing to a more sustainable world.

1.9 Ways of Working

1.9.1 To achieve the seven well-being goals, the Act requires that public bodies must act in a manner which seeks to ensure that the needs of the present are met without compromising the ability of future generations to meet their own needs. This principle is made up of the five ways of working that all public bodies are required to consider when applying sustainable development. Table 1-2 below identifies and briefly explains the five ways of working:

Table 1-2 Well-being of Future Generations Act Five Ways of Working

Ways of Working	Brief Description
Long term	The importance of balancing short-term needs with the needs to safeguard the ability to also meet long-term needs.
Integration	Considering how the public body's well-being objectives may impact upon each of the well-being goals, on their objectives, or on the objectives of other public bodies.
Involvement	The importance of involving people with an interest in achieving the well-being goals and ensuring that those people reflect the diversity of the area which the body serves.
Collaboration	Acting in collaboration with any other person (or different parts of the body itself) that could help the body to meet its well-being objectives.
Prevention	How acting to prevent problems occurring or getting worse may help public bodies meet their objectives.

1.10 The Ways of Working and the Gwent Levels Pilot Planning Guidance

1.10.1 The ways of working have been integral to the ISA and the work undertaken to date, as well as the work that lies ahead. Table 1-3 below considers how the ways of working shape what the Welsh Government have done in terms of drafting the guidance and how this can help achieve sustainable development.

Table 1-3 Ways of Working and the ISA

Long term
Development of Planning Guidance To ensure we consider the long term, the planning guidance has implemented the requirements of Policy 9 in Future Wales: The National Plan 2040, with a remaining 14-year framework upon publication of the guidance, which is anticipated in 2026. The production of the guidance has supported the monitoring work of Future Wales which will inform the work around any future reviews of that plan. The guidance makes use of recent evidence and trends and seek to understand their outcomes and implications and how this will be applied on the Gwent Levels and potentially other NNRAs (identified in Future Wales: Policy 9) across Wales. Ultimately, this pilot planning guidance is a long term strategic spatial document that is not constrained by short term needs.
Role of ISA – Scoping report The role of the ISA is to support the guidance long term, the process for which is set out in paragraph 1.3.9 of this Scoping Report. The testing framework that will emerge from this report will test the emerging guidance and assess its ability to deliver long term objectives and spatial change as well as consider short-, medium- and long-term impacts.
Role of ISA – Draft Environmental Report The role of the ISA is to support the guidance and ensure it maximises its potential beneficial impacts in the long term. The ISA framework that has been set through the Scoping Report has been used to test and shape the draft guidance. It has assessed its ability to deliver long term objectives and spatial change as well as consider short-, medium- and long-term impacts.
Integration Development of Planning Guidance The guidance spatially identifies resilient ecological networks (RENs) on the Gwent Levels, specifically, and set out a process on how this could potentially be applied to other NNRAs across Wales.

The process of identifying RENs for the purposes of this planning guidance is through a detailed and evidence-based assessment led by Natural Resource Wales (NRW). The approach applied by NRW identifies the connections between environmental, social, cultural and economic issues at every stage in the mapping process. This can be seen from the Gwent Levels Mapping Resilient Ecological Network core zones and nature recovery zones report ([Gwent Levels Mapping Resilient Ecological Network core zones and nature recovery zones](#)).

Role of ISA – Scoping Report

The ISA is an integrated approach to the development and assessment of the planning guidance to ensure a holistic approach is undertaken, knowledge is shared, and links are recognised between different topic areas and subsequent goals.

The ISA process incorporates a review of relevant plans, policies, programmes and environmental objectives at a local (Gwent Levels specific), regional and national scale. This enables us, the Welsh Government, to identify synergies and opportunities, as well as any inconsistencies and constraints. A compatibility test of the assessment framework has also been undertaken to ensure any conflicts are identified, resolved or managed appropriately, this can be found in the Scoping report.

Role of ISA – Draft Environmental Report

The role of the ISA is to support the development of the guidance by ensuring that statutory and non-statutory objectives are fully integrated into its preparation. Through the ISA Framework, these objectives, covering environmental, social, cultural and economic considerations, provide a structured basis for assessing how effectively the guidance contributes to sustainable development.

The ISA process involved assessing the Strategic Principles and Actions to understand the cumulative and overall expected impact of the guidance. This is an iterative approach that examines synergistic, secondary and cumulative effects, drawing on baseline evidence, sustainability issues, and integrated impact assessment requirements. As the assessment progresses, the ISA is refined to reflect improved evidence, stakeholder input and contextual understanding

Involvement

Development of Planning Guidance

Involving key stakeholders and local partners has been integral to the development of this guidance.

In addition to this formal consultation period on the ISA and draft planning guidance, there has been extensive and considerable engagement throughout the process to date largely with:

Statutory stakeholders

Local authorities that span the Gwent Levels landscape (Cardiff, Newport and Monmouthshire)

Local partners

Local charities and organisations

As the process moves forward to the implementation of the guidance, engagement will continue to be a key feature to ensure the outcomes are maximised.

Role of ISA – Scoping Report

The ISA provides an important opportunity for people to get involved in shaping the planning guidance as it progresses.

To capture key views and ensure a comprehensive assessment is undertaken a number of stakeholders were invited to contribute to a draft of the Scoping Report over a 5 week period in line with the SEA requirements. Appropriate amendments to the Scoping Report have been made taking into account the responses received. Stakeholders consulted on the draft Scoping Report included:

Statutory consultees as required by the SEA Regulations:

NRW

Cadw (Welsh Historic Monuments)

Non-statutory consultees who have a role in providing integrated assessment advice or who have a role with regards producing the planning guidance:

Gwent Levels Working Group (that included NRW, local authorities and local partnerships)

Policy 9 Task & Finish Group

Integrated Impact Assessment Welsh Government contacts (e.g. Welsh language and health)

Other non-statutory consultees consulted included:

Forestry Commission England

Environment Agency England

Historic England

Natural England

Marine Management Organisation

Severn Estuary Partnership

Renewable UK Cymru

Solar Energy UK

The representations received during the 5-week consultation have informed this final Scoping Report to ensure a robust framework and assessment has been produced.

Future stages of the ISA will continue to involve and engage a variety of organisations and individuals to ensure a wide range of views continue to be captured and help inform the planning guidance.

Role of ISA – Draft Environmental Report

The role of the ISA is to present clear, evidence-based information on the likely effects of the planning guidance upon which formal public consultation is now being undertaken. This ISA provides a structured assessment of environmental, social, cultural and economic effects, against the ISA Framework and incorporates the requirements of the SEA Directive and other integrated assessments, including

the consideration of significant, cumulative and overall impacts. The draft ISA is now being consulted upon and the responses received will help shape the final version.

Collaboration

Development of Planning Guidance

The planning guidance will not on its own be able to tackle and mitigate all of the key environmental, social, cultural and economic issues facing the Gwent Levels. The guidance sets out what issues it can assist with addressing. Those and other issues will rely on collaboration between different parties in order to holistically secure the sustainability of the Gwent Levels landscape moving forward. There will also be an opportunity for the guidance to facilitate the workstreams and actions of other groups and organisations to help deliver the overarching aim of identifying and safeguarding RENs on the Gwent Levels. By supporting the delivery of this overarching aim, the planning guidance will seek to maximise positive outcomes and deliver across all 7 well-being goals.

The planning guidance will inform all levels of the planning system, from the decision on individual developments and proposals at the local scale on the Gwent Levels, to the content of local and strategic development plans (LDPs and SDP) and to nationally, in future reviews of Future Wales: The National Plan 2040 and PPW.

The planning guidance will assist individuals and organisations that have a stake in the Gwent Levels landscape in shaping its future.

Role of ISA – Scoping Report

The ISA process has identified key issues and opportunities which could potentially be addressed by the planning guidance. Following engagement and on-going collaboration with stakeholders and end users, the evidence in the Scoping Report was amended and updated, as necessary. This then established the final ISA Framework against which the planning guidance has been tested.

Role of ISA – Draft Environmental Report

The ISA process has identified the key impacts and effects of the planning guidance and how it has the potential to address the ISA objectives. Engagement and collaboration with stakeholders and end users will continue as this work processes and will help to shape the final Environmental Report. These iterative updates will then inform the final version of the guidance and the assessment to ensure it is responsive, evidence-based, and robust.

Prevention

Development of Planning Guidance

The planning system is one of the key Government levers in identifying current and future land-use issues or problems and taking steps to address them, so that they are avoided or mitigated against. It also provides scope for identifying opportunities to safeguard and enhance the resilience of ecological networks and ecosystem services. The planning guidance identifies issues and opportunities on the Gwent Levels and will help to align the planning system nationally (through Future Wales, PPW and the guidance itself), regionally through SDPs and locally (through LDPs) to address them. The strength of the planning system and specifically this spatial planning guidance on the Gwent Levels is that it can

intervene over the long term to coordinate the outcomes of land-use decisions to achieve positive change. The guidance does this as there is a legal requirement for planning decisions to be made, and for development plans to be produced, that are in accordance with Future Wales: The National Plan 2040. The guidance is attributed to Future Wales (Policy 9) and therefore planning decisions will need to be made, and development plans will need to be produced, in accordance with the guidance.

The Gwent Levels planning guidance is evidence-based and will be subject to an ongoing programme of monitoring and review to establish progress towards meeting objectives and any intervention, if necessary. A link to the REN mapping for the Gwent Levels (that will be hosted on Data Map Wales by NRW) will be included within the guidance and this mapping may be updated more frequently by NRW as circumstances dictate moving forward.

Role of ISA – Scoping Report

The ISA is evidence based and feeds through the Scoping Report and has shaped the ISA Framework. The review of the evidence identified key issues and opportunities for the planning guidance to consider and will ensure the guidance avoids negative and enhances positive outcomes, where possible. The identification of issues and trends at an early stage in the Scoping Report has helped to shape the ISA Framework objectives and decision aiding questions, which in turn have shaped the emerging guidance.

Role of ISA – Draft Environmental Report

The guidance has been assessed against the ISA Framework and this is outlined in this draft Environmental Report. The assessment of the impacts and effects of the guidance ensures that it reflects the full extent of potential impacts and addresses negative effects while enhancing positive outcomes wherever possible.

The consideration of cumulative and overall effects has shaped the emerging guidance. This draft Environmental Report ensures that the ISA is compliant with the requirements of the SEA Directive addressing significant impacts.

1.11 Requirements of Strategic Environmental Assessment

1.11.1 SEA, as required by the SEA Directive and the SEA Regulations (see Section 1.7.1), is a structured and systematic decision support process designed to help ensure that environmental aspects are considered effectively during the production of plans etc. The process is defined by set stages and tasks to be completed in order to satisfy the requirements of the SEA Directive. Table 1-4 sets out where these various requirements have been satisfied in this ISA Report that has accompanied the preparation of the guidance.

Table 1-4 Requirements for an SEA Environmental Report and where these have been completed

Question	Yes/No/Where
Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment (SEA Directive) Annex I - Information referred to in Article 5(1)	
(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes	Yes. ISA Scoping Report & Sections 2.1 & 2.2 of this report
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	Yes. ISA Scoping Report & Section 2.3 of this report
(c) the environmental characteristics of areas likely to be significantly affected;	Yes. ISA Scoping Report & Section 2.3 of this report
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	Yes. ISA Scoping Report & Section 2.3 of this report
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation;	Yes. ISA Scoping Report & Section 1.7 of this report
(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	Yes. Summarised in Sections 2.4 & 2.5 of this report and detailed in Annex A.
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	Yes. Summarised in Table 2.5 and detailed in Annex A.
(h) an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Yes. Section 2.6 of this report.
(i) a description of the measures envisaged concerning monitoring in accordance with Article 10;	Yes. Section 2.8 of this report
(j) a non-technical summary of the information provided under the above heading	Yes. A separate Document published alongside this report.

Children's Rights

1.11.2 The duty placed on Welsh Ministers is to have due regard to the United Nations Convention on the Rights of the Child (UNCRC) when exercising any of their functions. The children's rights impact assessment is a tool that helps to demonstrate how the legal requirement is met by the Welsh Ministers.

1.11.3 The scoping work concluded that the guidance would have a potential impact on Articles 6, 15, 23, 24, 27, 28, 29, 31 within the UNCRC. This was fed into and shaped the ISA Framework, Objectives and decision aiding questions. Annex A sets out the detailed assessment of the guidance. It is noted that there are limited impacts identified and further detail will be available in the lower tier plans and their accompanying assessments.

How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Children's Rights	1, 2, 3, 4, 8, 9, 10, 11, 14 and 16

Equalities

1.11.4 The scoping work concluded that the guidance would have a potential impact on equalities and human rights. It identified the following protected characteristic groups for further consideration Age, Disability and Pregnancy and Maternity. This was fed into and shaped the ISA Framework, Objectives and decision aiding questions. This includes advancing and promoting equality of opportunity and good relations and wider community cohesion and seeking to create the conditions which assist in eliminating unlawful discrimination, harassment or victimisation through land-use planning initiatives.

1.11.5 Annex A sets out the detailed assessment of the guidance. It is noted that there are limited impacts identified and further detail will be available in the lower tier plans and their accompanying assessments.

1.11.6 Under the equality duty (set out in Section 149 of the Equality Act 2010), many public authorities, including the Welsh Government must have 'due regard' to the need to eliminate unlawful discrimination, harassment and victimisation as well as to advance equality of opportunity and foster good relations between people who share a protected characteristic and those who do not.

1.11.7 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Equalities	1, 2, 3, 4, 6, 8, 9, 10, 11, 12, 13 and 14

Rural Proofing

1.11.8 The screening and scoping work identified that rural areas could be impacted. These have informed the ISA Framework and will help to ensure impacts are addressed. Annex A sets out the detailed assessment of the guidance. It is noted that there are limited impacts identified and further detail will be available in the lower tier plans and their accompanying assessments

1.11.9 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Rural Proofing	1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15 and 16

Sustainable Land Management (SLM)

1.11.10 The scoping report concluded that the guidance will have a potential impact on SLM for agriculture. Whenever Welsh Ministers provide support for, or regulate, agriculture, other activities carried out on land used for agriculture, or ancillary activities, they must do so in accordance with the SLM duty. As required by the Agriculture (Wales) Act 2023. Annex A sets out the detailed assessment of the guidance. It is noted that there are limited impacts identified and further detail will be available in the lower tier plans and their accompanying assessments

1.11.11 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Sustainable Land Management (SLM)	1, 2, 3, 5, 6, 7, 9, 10, 12, 13, 14, 15 and 16

Health

1.11.12 The screening work concluded that the guidance could have an impact on health. The assessment of health has been based on the broad, participatory and inclusive methodology as advocated in Wales and described in 'HIA: A Practical Guide' (WHIASU, 2012) and has used the wider determinants of health as a framework for discussion. The ISA Framework encompasses health objectives and decision aiding questions.

1.11.13 Annex A sets out the detailed assessment of the guidance and highlights mainly positive impacts on health and wellbeing. Due to the scale of the work there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

1.11.14 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Health	1, 2, 3, 4, 5, 6, 8, 9, 10, 11, 12, 13, 14 and 15

Economic Development

1.11.15 The screening and scoping work identified a potential impact on the economy. This fed into the ISA framework and decision aiding questions. Annex A sets out the detailed assessment of the guidance and highlights a mix of mainly positive and some negative impacts on the economy and tourism. Due to the spatial scale of the work there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments.

1.11.16 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Economic	1, 2, 3, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14 and 16

Welsh Language

1.11.17 The Welsh Language (Wales) Measure 2011 and Standards require the following effects to be considered:

- What effect, if any, the guidance would have on the opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language;
- How the guidance could have positive effects or increased positive effects on opportunities for other persons to use the Welsh language, or treating the Welsh language no less favourably than the English language; and
- How the guidance could be developed so that it doesn't have or reduces any negative effects which the policy decision would have on opportunities for other persons to use the Welsh language or treating the Welsh language no less favourably than the English language.

1.11.18 The screening work concluded that the guidance will have a potential impact on the Welsh language. Objectives and decision aiding questions encompassing Welsh language have therefore been incorporated into the ISA Framework. This will ensure opportunities to promote the Welsh language; facilitate its use; to safeguard its future; and see the language thrive, are considered and identified where possible through this work.

1.11.19 The Welsh Government has a statutory obligation to fully consider the effects of its work on the Welsh language. The development of all policies, projects, research, legislation, grants, and services must be accompanied by appropriate consideration to the Welsh language, Welsh speaking people and communities.

1.11.20 The Welsh Government must seek opportunities to promote the Welsh language and facilitate its use to safeguard its future and see the language

thrive. A Welsh Language Impact Assessment (WLIA) is the process undertaken to ensure these duties are fulfilled.

1.11.21 Annex A sets out the detailed assessment of the guidance and highlights mainly neutral impacts on the Welsh language. Due to the nature and scale of the work there are limited impacts highlighted and further detail will be available in the lower tier plans and their accompanying assessments

1.11.22 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Welsh Language	1, 2, 3, 9, 11, 13 and 16

Climate Change

1.11.23 The screening and scoping work identified the guidance could have an impact on climate change. This has informed the ISA Framework including the Objectives and decision aiding questions and will help to ensure impacts are addressed. Annex A sets out the detailed assessment of the guidance. Further detail will be available in the lower tier plans and their accompanying assessments

1.11.24 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Climate Change	4, 6, 12, 14 and 16

Biodiversity – Environment (Wales) Act

1.11.25 The Environment (Wales) Act 2016 introduces the Sustainable Management of Natural Resources (SMNR) and sets out a framework to achieve this as part of decision-making. The objective of the SMNR is ‘using natural resources in a way and at a rate that... maintain and enhance the resilience of ecosystems and the benefits they provide and, in so doing, meet the needs of present generations of people without compromising the ability of future generations to meet their needs and contribute to the achievement of the well-being goals.’ Planning Policy Wales translates the principles of SMNR into use for the planning system.

1.11.26 The requirements of the Environment Act including the priorities identified by the Natural Resource Policy (NRP) have been included in the ISA framework and have informed the development of the guidance. These have a focus on Welsh natural resources, with SoNaRR16 providing an assessment of the sustainable management of natural resources and the NRP seeking to set out the national priorities in relation to the sustainable management of natural resources in Wales.

1.11.27 The guidance through addressing social, economic, environmental and cultural issues and opportunities takes an all-embracing approach to sustainable development where decisions on short and long term needs and cost and benefits come together. The ISA helps to secure these outcomes through identifying where multiple benefits can be provided and avoiding or minimising negative impacts.

1.11.28 The key features of the SMNR approach to which the planning system can contribute are:

- Improving the resilience of ecosystems and ecological networks
- Maintaining and enhancing biodiversity;
- Maintaining and enhancing green infrastructure based on seeking multiple ecosystem benefits and solutions;
- Ensuring resilient locational choices for infrastructure and built development, taking into account water supplies, water quality and reducing, wherever possible, air and noise pollution and environmental risks, such as those posed by flood risk, coastal change, land contamination and instability;
- Taking actions to move towards a more circular economy in Wales; and
- Facilitating the move towards decarbonisation of the economy.

1.11.29 It is recognised how the translation of SMNR into the planning system is an integral part of the essential components of sustainable places, through encouraging approaches based on identifying and securing outcomes which deliver multiple ecosystem benefits. The guidance looks to address these key features and the ISA sets out how this is achieved.

1.11.30 How and where in the ISA the requirements have been met:

Impact Assessment	ISA Objectives
Biodiversity	2, 5, 6, 7, 10, 12, 14, 15 and 16

1.12 The ISA and Gwent Levels Guidance processes to date

1.12.1 The ISA process to date has captured and accounted for stages A to E in Figure 1-2 above.

1.13 Evidence Gathering, ISA Scoping and Stakeholder Engagement

1.13.1 The production of the guidance has been based on and shaped by evidence and engagement and collaboration with stakeholders. Stakeholder

engagement has been carried out throughout the development of the guidance and has played an important role in shaping the assessment and guidance. A Task and Finish Group was established for the project which provided expert advice and contributed to interpreting the evidence and planning context, helping to ensure that the guidance developed aligned with Future Wales Policy 9. Additional engagement with statutory and non-statutory stakeholders ensured that relevant organisations were kept informed and able to comment on early findings. NRW also undertook stakeholder engagement in producing the REN mapping used as the basis for the spatial expression of the Guidance.

1.13.2 The ISA Scoping stage gathered further evidence including bringing together the relevant plans, policies and programmes and analysing a range of evidence to highlight key issues and opportunities. This evidence developed an understanding of the environmental, social, cultural and economic baseline, and considered how these conditions were likely to change without the implementation of the guidance. This baseline was then analysed to identify the key sustainability issues and opportunities that the emerging guidance needed to address. Following a focussed consultation on the draft Scoping report, it was refined. The evidence, engagement and consultation have all informed the ISA Framework, which set out the 16 objectives and decision aiding questions that have been used to assess the guidance against.

1.14 HRA

1.14.1 Consideration is being given to the requirements of a Habitats Regulations Assessment (HRA) in preparing The Guidance. This is because its implementation has the potential to influence development and land-use decisions in proximity to several European and internationally designated nature conservation sites. A number of Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) fall within its sphere of influence. Under the Conservation of Habitats and Species Regulations, any plan or guidance that may affect the integrity of these sites, either alone or in combination with other plans or projects, must be assessed through the HRA process. The same assessment, as a matter of policy, has also been applied to Ramsar sites.

1.14.2 Although The Guidance does not allocate development, it is expected to shape decision making in ways that could indirectly affect designated habitats and species, for example through changes to land management, hydrology, water quality, disturbance, or habitat connectivity. As potential effects on SACs, SPAs and Ramsars cannot be ruled out at this stage, preparing The

Guidance requires the consideration of HRA to ensure it does not adversely affect the integrity of those protected sites and species.

1.14.3 Work to address the HRA requirements is currently underway and will continue to be undertaken with the involvement of Natural Resources Wales (NRW) to ensure the assessment is robust and compliant with the Habitats Regulations. The outcomes of the HRA process will also influence the final drafting of The Guidance and may lead to changes from this draft version where necessary to meet the requirements of the regulations and demonstrate that there are no adverse effects on the integrity of European and internationally designated sites.

1.15 How has the ISA been Undertaken

Geographical Scope of the ISA

1.15.1 The geographical scope of the ISA has been driven by the geographical scope of the guidance, which is area specific. The Gwent Levels is a strategic site/area that spans parts of three local authority areas in southeast Wales between Cardiff and Chepstow and along the northern edge of the Severn Estuary, some of the baseline issues may relate to neighbouring England (for example, employment and commuting flows) and terrestrial and marine effects (up to the mean low water mark) will all need to be considered.

Temporal Scope of the ISA

1.15.2 The guidance will apply alongside Future Wales, which will remain in force until 2040 or until it is updated. The assessment has covered the same period with short term covering 5 years, medium term covering 10 years and long term covering 20 years.

1.16 ISA Framework

1.16.1 A key output of the ISA Scoping Stage was the ISA Framework. Whilst the SEA Directive does not require the use of sustainability objectives, they are a recognised tool for undertaking ISA. The ISA Framework (Table 1-5) is the main assessment tool used during the ISA and comprises a series of 16 Objectives covering social, economic, cultural and environmental issues. These Objectives have been used to test the sustainability performance of the Gwent Levels guidance. Each Objective links to the baseline information; key sustainability issues and opportunities in Wales; and other plans, programmes and strategies relevant to the guidance. These were established during the

Scoping stage and subsequently form the basis of the assessment. The ISA Framework also incorporates the requirements of the other integrated assessments.

1.16.2 Annex 1(f) of the SEA Directive lists the following twelve topics that require consideration in any SEA, as well as the interrelationship between these topics.

SEA Directive (Annex 1) Requirements for environmental problems and topics to be considered during SEA

Information to be provided in SEA includes:

“(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;

...

(f) the likely significant effects (1) on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;...”

1.16.3 The topics listed in Annex 1(f) were carried through into the ISA Objectives set out in the ISA Framework (see Table 1-6). In some cases, several topics are incorporated into one ISA Objective, such as the topics of biodiversity, fauna and flora being incorporated into ISA Objective 5 ‘To halt and reverse biodiversity loss and contribute to the protection and effective management of 30% of our land, freshwater and sea for nature by 2030’. In other cases, ISA Objectives are more focussed on one particular SEA topic, such as ISA Objective 4 ‘To promote opportunities to encourage the protection and improvement of air quality’, which is focussed on the topic of air. The topic of ‘material assets’ is varied and is considered to comprise all natural and built assets in Wales, such as transport infrastructure, built infrastructure and buildings. The varied elements of material assets come through in nearly all ISA Objectives. Where Annex 1(f) requires the ‘interrelationship between the above factors’, this is brought out in the cumulative and synergistic effects assessment in Chapter 2 as well as more generally in all assessments, such as where assessments identify the potential impacts of development on air quality and the implications of this for human health or biodiversity (e.g. new development could lead to an increase in road traffic, which could worsen air quality, and this could have a potential adverse effect on human health and any nearby habitats sensitive to atmospheric nitrogen deposition).

1.16.4 The ISA Objectives go beyond the SEA topics to also factor in social and economic elements that are not a focus of the SEA Directive but are a key element of SA and other impact assessments, such as Welsh language.

1.16.5 The intention of the ISA is to enable the principles of sustainable development to be embedded into the guidance from the outset. The appraisal framework of objectives and decision aiding questions has been designed to embed the principles of sustainable development, in the context of what the guidance could potentially achieve. The ISA has been undertaken using an iterative process, with the team ensuring feedback and outcomes of the assessments are incorporated in both documents. This process enables the guidance to take a more sustainable direction in its development.

1.16.6 The basic principles of the approach to the appraisal are outlined in the section 1.5. It is noted that the approach is reflective of the requirements of the SEA Regulations. Section 1.7 provide the details of the statutory and non-statutory requirements for the integrated assessments.

Table 1-5 ISA Framework

ISA Framework for Assessing the Gwent Levels Planning Guidance		
ISA Objectives	Decision aiding questions 'Will the Gwent Levels Planning Guidance....'	Well-being goal
Economy		
1. To promote sustainable economic growth and strengthen the resilience of the rural economy across the Gwent Levels	<ul style="list-style-type: none">• Promote opportunities for children and young people to have a say in how land is used?• Promote opportunities for sustainable economic growth?• Support opportunities for the enhancement and diversification of the rural economy?• Encourage opportunities for new and existing businesses?• Promote opportunities for a vibrant and viable agricultural sector?• Promote opportunities for the sustainable management of agricultural land?• Support opportunities for businesses and infrastructure to become more resilient when facing the risks from climate change?• Encourage opportunities for skills and training?	<p>A Prosperous Wales</p> <p>A Resilient Wales</p> <p>A Healthier Wales</p> <p>A More Equal Wales</p> <p>A Wales of Cohesive Communities</p> <p>A Wales of Vibrant Culture and Thriving Welsh Language</p> <p>A Globally Responsible Wales</p>

<p>2. To encourage and promote sustainable tourism opportunities</p>	<ul style="list-style-type: none"> • Promote and encourage opportunities for sustainable tourism that sensitively capitalises on the area's unique environment, cultural, heritage and other landscape assets? • Support opportunities for new and existing businesses? 	<p>A Prosperous Wales A Resilient Wales A Healthier Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales</p>
<p>Education</p>		
<p>3. To encourage opportunities to increase educational attainment across all age groups by using the Gwent Levels landscape as a natural learning resource</p>	<ul style="list-style-type: none"> • Encourage and support an increase in levels of participation and educational attainment for all members of society? • Encourage and support an improvement in the provision of education and training through land-use planning and local community initiatives? • Encourage and support volunteering opportunities and Citizen Science Projects on the Gwent Levels? 	<p>A Prosperous Wales A Healthier Wales A More Equal Wales A Wales of Vibrant Culture and Thriving Welsh Language</p>

	<ul style="list-style-type: none"> • Encourage and support school children and higher education establishments to use the Gwent Levels as a natural learning resource? 	A Globally Responsible Wales
Air Quality		
4. To promote opportunities to encourage the protection and improvement of air quality	<ul style="list-style-type: none"> • Promote opportunities to improve and protect air quality? • Encourage opportunities within which the impact of emissions (from adjoining urban areas, roads and railways) will be reduced? • Promote opportunities to protect the Gwent Levels so it is not adversely affected by air pollution? • Encourage active travel across the Gwent Levels? • Improve active travel links between the more rural Gwent Levels landscape and adjoining urban areas? 	A Resilient Wales A Prosperous Wales A Resilient Wales A Healthier Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales
Biodiversity, Flora and Fauna		
5. To halt and reverse biodiversity loss and contribute to the	<ul style="list-style-type: none"> • Identify opportunities to safeguard, enhance and create ecological networks? 	A Resilient Wales

<p>protection and effective management of 30% of our land, freshwater and sea for nature by 2030</p>	<ul style="list-style-type: none"> • Protect ecological networks so that they are not unduly compromised by future development? • Identify ecological networks to help mitigate and adapt to climate change? • Identify ecological networks to protect the range of species found on the Gwent Levels? • Identify ecological networks that support key ecosystem services? • Create opportunities to increase the diversity, extent, condition, connectivity and adaptability (DECCA) of ecosystems on the Gwent Levels to deliver a Net Benefit for Biodiversity (NBB)? • Create opportunities for the conservation and enhancement of the area's Section 7 habitat, statutory and non-statutory designated sites? • Create opportunities for the conservation and enhancement of the marine environment? • Create opportunities to safeguard the dynamic interface and intertidal area of the Gwent Levels where land meets sea? • Create opportunities for the conservation and enhancement of natural green space? • Create opportunities to monitor Invasive Non-Native Species (INNS) distribution, prevent spread and address the issues caused by these species? • Create opportunities for raising awareness and promoting good biosecurity practices to reduce the level and spread of INNS? 	<p>A Healthier Wales</p> <p>A Wales of Cohesive Communities</p> <p>A Wales of Vibrant Culture and Thriving Welsh Language</p> <p>A Globally Responsible Wales</p>
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Climate and Flood Risk		
6. To contribute to the reduction and management of flood risk	<ul style="list-style-type: none"> Contribute to the reduction and management of flood risk? Encourage and support effective management of the area's drainage system? Encourage new development to be climate change resilient? Support or improve the resilience of existing and proposed development to flood risk? Promote the benefits of GI in sustainable flood risk management? Promote opportunities to safeguard the dynamic interface and intertidal area of the Gwent Levels that is subject to flood risk? Support opportunities to address challenges in agricultural productivity from flood risk? Help to consider appropriate risk for development in Flood Zone 2 and development be avoided in Flood Zone 3, subject to the limited exceptions. 	A Resilient Wales A Healthier Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales
7. To contribute to the management and maintenance of the Gwent Levels drainage system	<ul style="list-style-type: none"> Contribute to the management and maintenance of the Gwent Levels drainage system? Maintain the area's distinctive landscape features of drainage ditches, grips and reens? Maintain supporting habitat and increase connectivity between (and within) the area's drainage system and core sites of ecological value? 	A Wales of Vibrant Culture and Thriving Welsh Language A Resilient Wales A Healthier Wales A Wales of Cohesive Communities

		<p>A Wales of Vibrant Culture and Thriving Welsh Language</p> <p>A Globally Responsible Wales</p>
Health and Well-being		
8. To contribute to an improvement in physical, mental and social health and well-being	<ul style="list-style-type: none"> • Promote opportunities for and improvement in physical, mental and social health and well-being? • Contribute towards healthy lifestyles and promote well-being through active travel? • Contribute towards improving access to biodiversity and open green space for its amenity, play, leisure and recreation value? • Create opportunities for access to a clean and unique wetland habitat? • Contribute towards an increase in green infrastructure? • Encourage opportunities for local communities to reduce health risks from poor air quality and climate change? • Support opportunities to reduce health inequalities, including in children? 	<p>A Healthier Wales</p> <p>A Resilient Wales</p> <p>A Wales of Cohesive Communities</p> <p>A Wales of Vibrant Culture and Thriving Welsh Language</p> <p>A Globally Responsible Wales</p>

Population		
9. To encourage opportunities within which social cohesion and equality can be improved	<ul style="list-style-type: none"> • Encourage opportunities within which social cohesion and equality can be improved? • Support opportunities within which socio-economic disadvantage can be improved? • Promote opportunities within which age inequality (from children to older people) may be reduced? • Promote opportunities within which inequalities based on disability can be improved, including in children? • Promote opportunities within which inequalities based on pregnancy and maternity can be improved? • Encourage opportunities for the development of stronger and more cohesive communities? 	A More Equal Wales A Prosperous Wales A Healthier Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales
Crime		
10. To promote opportunities for the reduction of fly-tipping and littering	<ul style="list-style-type: none"> • Promote opportunities for the reduction of fly-tipping and littering on or adjacent to the Gwent Levels? • Support opportunities to raise awareness and reduce environmental damage and degradation caused by fly-tipping and littering? • Support opportunities to reduce the fear and nuisance caused by fly-tipping and littering within local communities? 	A Wales of Cohesive Communities A Resilient Wales A Healthier Wales

		A Wales of Vibrant Culture and Thriving Welsh Language A Globally Responsible Wales
Welsh Language		
11. To contribute towards the future well-being of the Welsh Language	<ul style="list-style-type: none"> • Promote the use of the Welsh Language in rural communities across the Gwent Levels? • Encourage an increase in Welsh speakers? • Promote bilingual signs, literature, resources and events? 	A Prosperous Wales A More Equal Wales A Wales of Cohesive Communities A Wales of Vibrant Culture and Thriving Welsh Language
Landscape Character		
12. To create opportunities for the protection and enhancement of the Gwent Levels' unique	<ul style="list-style-type: none"> • Create opportunities for the protection and enhancement of the Gwent Levels landscape and seascape? 	A Wales of Vibrant Culture and Thriving Welsh Language

<p>and distinctive landscape and seascape</p>	<ul style="list-style-type: none"> • Create opportunities for the protection and enhancement of the area's unique landscape character, distinctiveness, diversity and quality? • Create opportunities to guide and control new development proposals, in land use planning terms? • Create opportunities to promote sustainable development and key place-making principles on the Gwent Levels? • Create opportunities to reduce noise and light pollution? • Create opportunities to maintain the landscapes visual and sensory qualities, including its strong sense of tranquillity and remoteness? • Create opportunities to maintain the distinctiveness of the landscape and seascape for the benefit of local communities and visitors? • Create opportunities to maintain the distinctiveness of the Gwent Levels 'lingo'? • Create opportunities for the landscape and seascape to become more resilient to the effects of climate change? • Support the maintenance and development of a thriving and sustainable agricultural sector on the Gwent Levels that works in harmony with the natural environment? 	<p>A Prosperous Wales</p> <p>A Resilient Wales</p> <p>A Healthier Wales</p> <p>A Wales of Cohesive Communities</p> <p>A Globally Responsible Wales</p>
<p>13. To create opportunities to protect, conserve and enhance the historic environment of the Gwent Levels at a landscape scale,</p>	<ul style="list-style-type: none"> • Create opportunities for the protection, conservation and enhancement of designated historic assets, their settings and the cultural significance of the Gwent Levels landscape? 	<p>A Wales of Vibrant Culture and Thriving Welsh Language</p> <p>A Resilient Wales</p>

<p>including its heritage assets, their settings, and the area's cultural significance</p>	<ul style="list-style-type: none"> • Create opportunities to promote the significance of historic assets across the Gwent Levels, so there is greater access, understanding and enjoyment for all of the landscape as a whole? • Create opportunities for the conservation and enhancement of the historic landscape across the whole of the Gwent Levels? • Recognise, protect and promote the area's historic assets at a landscape scale? • Create opportunities to protect and promote the cultural significance of the Gwent Levels at a landscape scale? • Create opportunities to promote the Welsh language whilst seeking to conserve the culture and heritage of the Gwent Levels? • Create opportunities to identify buried archaeological sites and protect them”. 	<p>A Healthier Wales A Wales of Cohesive Communities A Globally Responsible Wales</p>
<p>Greenhouse Gas Emissions</p>		
<p>14. To protect and enhance opportunities for greenhouse gas emissions to be reduced, stored and sequestered across the Gwent Levels</p>	<ul style="list-style-type: none"> • Promote opportunities to reduce greenhouse gas emissions on the Gwent Levels? • Promote opportunities to reduce greenhouse gas emissions (from transport) within and around the Gwent Levels? • Promote opportunities for sustainable design in new developments and promote key place-making principles? • Support opportunities to reduce energy demand and increase energy efficiency? • Recognise, protect and enhance the ability of the Gwent Levels to store and sequester carbon? 	<p>A Globally Responsible Wales A Prosperous Wales A Resilient Wales A Healthier Wales A Wales of Cohesive Communities</p>

	<ul style="list-style-type: none"> • Encourage opportunities to meet national renewable energy targets whilst protecting the overall character and integrity of the Gwent Levels landscape as a whole? 	
Water		
15. To protect and improve water quality and water resources	<ul style="list-style-type: none"> • Encourage and support the improvement of the ecological and chemical status of waterbodies? • Encourage and support the reduction of point source and diffuse pollution? • Promote water efficiency? • Ensure the sustainable management of water resources for ecosystems, abstraction and recreation? • Promote the use of nature-based solutions? 	<p>A Prosperous Wales</p> <p>A Resilient Wales</p> <p>A Healthier Wales</p> <p>A Wales of Cohesive Communities</p> <p>A Globally Responsible Wales</p>

Soil and Land Management	
16. To protect geology and soil and promote the sustainable use and management of land	<ul style="list-style-type: none"> • Promote the sustainable use and management of land? • Protect and enhance high quality agricultural soils and recognise them as a finite resource? • Support the protection and restoration of peatlands? • Promote opportunities to conserve and enhance soil health and function? • Promote opportunities to reduce land contamination? • Create opportunities to protect and avoid damage to geologically important sites? • Optimise educational opportunities that geological sites offer as natural learning resource.

1.17 Coverage of SEA Directive Topics by ISA Objective

Table 1-6

Coverage of the SEA Directive Topics by ISA Objective	
SEA Directive Topics	Main ISA Objective(s)
Biodiversity	4, 5, 6, 7, 10, 15 and 16
Population	1, 2, 3, 4, 8, 9, 11, 13 and 15
Human Health	1, 2, 3, 4, 5, 6, 8, 9, 10, 13, 14 and 15
Fauna	5, 6, 7, 10, 14, 15 and 16
Flora	5, 6, 7, 10, 14, 15 and 16
Soil	5, 6, 7, 10, 12, 14, 15 and 16
Water	5, 6, 7, 10, 14, 15 and 16
Air	4, 5 and 14
Climatic Factors	1, 2, 4, 5, 6, 7, 8, 14, 15 and 16
Material Assets (inc. infrastructure, land resources, public assets, buildings and property)	1, 2, 5, 6, 7, 12, 13, 14 and 16
Cultural Heritage including architectural and archaeological heritage	2, 7, 8, 9, 11, 12 and 13
Landscape	2, 7, 8, 9, 12, 13, 15 and 16

1.18 Coverage of Integrated Impact Assessments by ISA Objective

Table 1-7

Coverage of the other integrated impact assessments by ISA Objective	
Impact Assessment	Main ISA Objective(s)
Children's Rights	1, 2, 3, 8 and 9
Equalities	1, 2, 3, 8 and 9
Rural Proofing	1, 2, 5, 6 10, 12 and 16
Sustainable Land Management (SLM)	1, 2, 5, 6, 7, 10, 12, 13, 14, 15 and 16
Health	1, 2, 3, 4, 5, 6, 7, 8, 9, 10 13, 14, 15 and 16
Economic	1, 2, 3, 14 and 16
Welsh Language	1, 2 and 11
Biodiversity	4, 5, 6, 7, 10, 15 and 16
Climate Change	1, 2, 4, 5, 6, 7, 8, 14, 15 and 16

1.19 Methodology

1.19.1 The approach adopted included the following steps (refer to Figure 1-2):

- B1: Testing the guidance Strategic Principles and Actions against the ISA objectives;
- B2: Developing strategic options;
- B3: Predicting the effects (including cumulative and secondary effects) of the guidance including alternatives;
- B4: Evaluating the effects (including cumulative and secondary effects) of the guidance including alternatives;
- B5: Consider ways of mitigating adverse effects and maximising benefits; and
- B6: Proposing measures to monitor the significant effects of implementing the guidance

1.19.2 Table 1-8 and 1-9 present the scoring method for each of the assessments presented in this report.

1.19.3 Table 1-8 presents the key for the assessment of the Strategic Principles and Actions. Used alongside the ISA Framework (Table 1-5), this enables the potentially significant sustainability effects, whether positive or negative, to be

drawn out of the assessment, enabling a framework for recommendations to be made for improvements to the guidance. How these recommendations have been taken into account has also been identified. Table 1-9 provides a definition of terminology of types of effects that, alongside direct effects, have been considered in the assessment.

1.19.4 Our integrated approach to assessing the impact of the guidance brings together key assessments into a single appraisal framework. However, the approach is clear in that all potential significant effects will be set out within the assessments, including specific effects that relate to the specific assessment types. Set in the context of the seven well-being goals, the various areas for consideration cover the social, economic, environmental and cultural aspects of Wales now, and in the future. Tables 1-6 and 1-7 demonstrate how the requirements of the SEA Directive and the impact assessments have been included within the ISA Framework of objectives to be used to appraise the guidance.

Table 1-8 Assessment Key

Scoring of Assessment	
++	Strong positive – likely to result in strong progress towards the ISA objective (significant)
+	Minor positive – likely to result in limited progress towards the ISA objective
0	Neutral outcome
+/-	Range of possible positive and negative outcomes
?	Uncertain outcome
-	Minor negative – likely to work against the achievement of the ISA objective
--	Strong negative – likely to strongly work against the achievement of the ISA objective (significant)
Scale	SR – Sub Regional
T/P	T- Temporary P – Permanent
Certainty	H- High M- Medium L - Low
ST	Short Term – 5 years
MT	Medium Term – 10 years
LT	Long term – 20 years

Table 1-9 Definitions of Secondary, Cumulative and Synergistic Effects

Type of Effect	Definition
Secondary	Indirect effects that are not a direct result of the plan but occur away from the original effect or as a result of a complex pathway.
Cumulative	Effects arise, for instance, where several developments each have insignificant effects but together have a significant effect; or where several individual effects of the plan (e.g. noise, dust and visual) have a combined effect.
Synergistic	Effects interact to produce a total effect greater than the sum of the individual effects.

2. Assessment of Draft Gwent Levels Guidance

2.1 Contents of the Draft Gwent Levels Guidance

2.1.1 The Draft Gwent Levels Guidance is structure in the following way:

- Purpose, Scope and Status of the Guidance – *sets out why the guidance is needed, its purpose and status*
- Developing the Guidance - *sets out the evidence sources and baseline information and the assessment process.*
- Development Plan and Policy Context – *sets out the planning context for the guidance*
- The Gwent Levels – a unique Welsh Landscape – *sets out an overview and context for the Gwent Levels*
- Current Challenges Affecting the Gwent Levels – *sets out the issues and threats affecting the Levels*
- The Gwent Levels NNRA – a spatial designation – *sets out the background to the REN mapping*
- Principles for the Gwent Levels NNRA, Core and Recovery (Opportunity) Zones – *Sets out the three Strategic Principles and 14 Actions and their interrelationship*

2.1.2 This ISA appraisal has focused on the Strategic Principles and the Actions and their reasonable alternatives. Note that the wording below reflects the wording and also the numbering at the time the assessment was undertaken and therefore they will differ from those set out in the draft Guidance being consulted. This is because the assessment resulted in a number of recommendations to improve the wording and application of the Strategic Principles and Actions (see Table 2-5). As a result of the assessment the numbering of some of the Actions will have also changed. In the draft Guidance being consulted upon Action 11 as assessed below has become Action 6. Subsequently Actions 6-10 below will have all moved up one number and become Actions 7-11 in the actual draft Guidance.

2.2 Relationship between the Draft Gwent Levels Guidance and other Plans and Programmes

SEA Directive (Annex 1) Requirements for identifying other relevant plans

The identification of other relevant Plans should account for:

“(a) an outline of the contents, main objectives of the plan or programme and relationship with other relevant plans and programmes; ...
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation; ...”

2.2.1 The relationship of the guidance with Future Wales and PPW is set out in section 1.2 above. This section and section 1.1 set out the purpose of the guidance. The ISA Scoping report identified the plans policies and programmes from the national to the local scale and how the Gwent levels and ISA should account for them. This will be kept up to date as the assessment progresses, reflecting its iterative nature. Of particular importance are the following documents:

- Future Wales: The National Plan 2040
- Planning Policy Wales.

2.3 Future Trends

SEA Directive (Annex I) Requirements for baseline data and key sustainability issues

The requirement to identify sustainability problems and issues arises from the SEA Directive, where the Environmental Report required under the Directive should include:

“(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;

(c) the environmental characteristics of areas likely to be significantly affected;

(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EE...”

2.3.1 The ISA Scoping Report outlined in the baseline data of the current state of the environment in Wales, characteristics of the environment likely to be significantly affected by the guidance as well as existing environmental issues relevant to the guidance.

2.3.2 Table 2-1 presents the likely evolution of the relevant aspects of the environment without the implementation of the Gwent Levels guidance. These likely future trends of the environmental baseline are considered to be either static, improving or declining. Future trends were calculated based on an analysis of baseline data identified and compiled during the ISA Scoping stage and how these trends have changed over time for all of Wales.

Table 2-1: Future trends in the Gwent Levels for each ISA Objective

ISA Objective	Future Baseline
2 To encourage and promote sustainable tourism opportunities	Static
3 To encourage opportunities to increase educational attainment across all age groups by using the Gwent Levels landscape as a natural learning resource	
4 To promote opportunities to encourage the protection and improvement of air quality	
6 To contribute to the reduction and management of flood risk	
7 To contribute to the management and maintenance of the Gwent Levels drainage system	
8 To contribute to an improvement in physical, mental and social health and well-being	
9 To encourage opportunities within which social cohesion and equality can be improved	
10 To promote opportunities for the reduction of fly-tipping and littering	
11 To contribute towards the future well-being of the Welsh Language	
13 To create opportunities to protect, conserve and enhance the historic environment of the Gwent Levels at a landscape scale, including its heritage assets, their settings, and the area's cultural significance	
16 To protect geology and soil and promote the sustainable use and management of land	Improving
1 To promote sustainable economic growth and strengthen the resilience of the rural economy across the Gwent Levels	
5 To halt and reverse biodiversity loss and contribute to the protection and effective management of 30% of our land, freshwater and sea for nature by 2030	
12 To create opportunities for the protection and enhancement of the Gwent Levels' unique and distinctive landscape and seascape	
14 To protect and enhance opportunities for greenhouse gas emissions to be reduced, stored and sequestered across the Gwent Levels	Declining
15 To protect and improve water quality and water resources	

2.4 Assessment findings - Strategic Principles

2.4.1 There are three Strategic Principles which have been assessed, and Table 2-2 provides a summary of their cumulative assessments. The full assessment can be found in Annex A. Note that the wording of the Strategic Principles at the time of the assessment will differ from those set out in the draft Guidance being consulted. This is because the assessment resulted in a number of recommendations to improve the wording of the Strategic Principles (see Table 2-5).

2.4.2 The three Strategies Principles reflect the spatial strategy for the guidance. They define the NNRA boundary (Strategic Principle 1), the Core Zone (Strategic Principle 2) and the Recovery Zone (Strategic Principle 3), giving clear spatial expression to the requirements of Future Wales Policy 9 within the Gwent Levels. This approach has been shaped by the evidence prepared by Natural Resources Wales, including the mapping of resilient ecological networks across the Gwent Levels.

2.4.3 Strategic Principle 1 is expected to have mostly minor positive or neutral impacts. The strongest benefits relate to biodiversity. The outcome for sustainable economic growth is more complex, where short term impacts may include some negative consequences in that it could limit some growth but that growth would already be constrained by existing national policy. These effects transition to positive impacts over the longer term with appropriate growth coming forward in line with the Guidance. Objectives relating to education, social cohesion and equality, fly tipping, air quality and the Welsh language are considered to have overall neutral outcomes due to the scope and focus of the guidance.

2.4.4 Strategic Principle 2 is expected to have a significantly positive overall impact. Its focus on the Core Zone, which contains a high concentration of designated sites, results in substantial benefits for biodiversity, the historical environment, drainage, greenhouse gas emissions, health and well-being, water quality and landscape and seascape objectives. These benefits are anticipated to strengthen over time as the Principle supports the protection and enhancement of key ecological features and deliver ecosystem resilience. Positive impacts on flood risk, air quality, social cohesion and equality, sustainable economic development and tourism arise mainly as secondary benefits linked to improved environmental quality and therefore register as minor positive. As with Strategic Principle 1, objectives such as education, fly tipping and the Welsh language are considered to have neutral impacts.

2.4.5 Strategic Principle 3 is expected to have a significant positive overall impact. The Principle looks to support the Core Zone by reinforcing ecological connectivity within the Recovery Zone, which plays an important role in long term landscape and ecosystem resilience. Some benefits are likely to extend beyond the Recovery Zone itself. It is not surprising that the impact assessment for this Principle mirrors many of the positive effects identified for Strategic Principle 2, as both focus on strengthening ecological networks and enhancing environmental quality. The main contrast arises from the limited size of the Recovery Zone. Environmental outcomes remain consistently significantly positive, especially for biodiversity. As with the Strategic Principle 1, the objectives relating to education, air quality, social cohesion and equality, fly tipping and the Welsh language are considered to have neutral impacts.

2.4.6 The assessment made a number of recommendations in order to help avoid or mitigate negative effects and to help maximise positive effects of the Strategic Principles. These recommendations are set out in Table 2-5 which also outlines how they have shaped the guidance.

2.5 Assessment findings - Actions

2.5.1 There are 14 Actions which have been assessed, and Table 2-2 provides a summary of their cumulative assessments. The full assessment can be found in Annex A. Note that the wording of each Action as set out in Annex A reflects the wording and also the numbering at the time the assessment was undertaken and therefore they will differ from those set out in the draft Guidance being consulted. This is because the assessment resulted in a number of recommendations to improve the wording and application of the Actions (see Table 2-5). As a result of the assessment the numbering of some of the Actions will have also changed. In the draft Guidance being consulted upon Action 11 as assessed has become Action 6. Subsequently Actions 6-10 (as per Annex A) will have all moved up one number and become Actions 7-11 in the actual draft Guidance.

2.5.2 The overall impact of the guidance indicates that the Actions collectively perform well against the ISA framework, with a predominance of positive and significant positive impacts across the environmental and landscape management objectives. There is a trend where Actions A6 to A14 which sit under Strategic Principles 2 and 3 consistently register significant positive impacts against the environmental objectives. The strongest areas of alignment relate to biodiversity, landscape and seascape, the historic environment, soil management and the drainage system, where many Actions are expected to contribute positively, and in several cases this is anticipated to increase to significant positive impacts in the long-term.

2.5.3 All Actions are expected to deliver positive impacts on biodiversity with Actions A1, A8, A10, A12, A13 expected to have a significant positive impact in delivering the objective. Greenhouse gas emissions and flood risk follow a similar pattern, although the scale of benefit is more limited. Here, the appraisal identifies largely minor positive outcomes, reflecting the indirect or secondary nature of the influence exerted by the Actions. The overall impact from environmental and landscape management actions suggest that the direction of the guidance is significantly supportive of environmental protection and long-term resilience.

2.5.4 Across the social objectives, particularly those relating to health and well-being and social cohesion, the assessment identifies a consistent pattern of beneficial impacts. Many of the Actions demonstrate a potential for the guidance to enhance community outcomes, largely secondary impacts through improvements in ecosystem benefits and the promotion of green infrastructure. Within these objectives, there is a noticeable trend whereby Actions associated with the Core Zone tend to perform less strongly compared with other areas, reflecting the rural and designated character of the Core Zone and the consequent limitations on the scale of social benefits that can realistically be achieved. While the level of benefit varies between Actions, the overall direction of the impact remains positive, with most interventions expected to deliver at least minor long-term positive gains. Particularly significant positive impacts are associated with Actions linked to Strategic Principle 1 (Actions A1-A5), where the appraisal highlights pronounced long-term benefits for health and well-being.

2.5.5 The guidance shows an overall minor positive effect on the objectives for sustainable economic development and tourism. Several Actions that set clearer requirements for land-use proposals are expected to generate a mix of short-term positive and negative effects, but these settle into minor long-term benefits as appropriate development becomes better aligned with sustainable principles. Actions A9 and A10 are assessed as having a neutral impact as they relate to agricultural management of the ditches and water availability and hydrology and therefore unlikely to lead to meaningful change in economic or tourism outcomes.

2.5.6 In contrast, a few objectives—such as educational attainment, air quality, fly tipping and Welsh language, show more limited or neutral relationships with the proposed Actions. This reflects areas where the guidance influence is indirect or uncertain, rather than indicating adverse effects. In some cases, Actions associated with the Core Zone are expected to have minor positive impact regarding air quality though the scope is limited. Neutral scoring is

common for these objectives, highlighting that while no significant harm is anticipated, additional interventions outside the scope of this guidance may be required to drive measurable change. For some Actions, particularly A1, A5, A6, A11 and A14, the impact is seen as uncertain. These uncertainties typically relate to environmental factors such as air quality, flood risk, water quality, soil and landscape management, and greenhouse gas emissions, suggesting that the effects could vary depending on how proposals are taken forward.

2.5.7 Taken together, the assessment points to a package of Actions that are environmentally robust, socially supportive and broadly sustainable, with strong long-term benefits anticipated across many of the ISA objectives. Areas of uncertainty or limited influence are clearly identifiable and can be addressed through future detailed work, but the overarching narrative is one of alignment with the principles of ecosystem resilience and a positive contribution to the objectives within the ISA framework.

Assessment recommendations

2.5.8 The assessment made some recommendations to strengthen the Strategic Principles and Actions and these are set out in table 2-4 which also outlines how they have shaped the guidance.

2.6 Reasonable Alternatives

SEA Directive requirements for considering reasonable alternatives
<p>SEA Regulations Annex 1(h): “an outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of knowhow) encountered in compiling the required information.”</p> <p>SEA Directive Art. 5(1): “Where an environmental assessment is required under Article 3(1), an environmental report shall be prepared in which the likely significant effects on the environment of implementing the plan or programme, and reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme, are identified, described and evaluated. The information to be given for this purpose is referred to in Annex I.”</p>

Reasonable Alternatives for Strategic Principles 1 - 3

- 2.6.1 In considering whether reasonable alternatives exist to defining the Gwent Levels NNRA boundary and delineating the Core and Recovery (Opportunity) Zones, it is essential to recognise that Strategic Principles 1–3 re-iterate Future Wales Policy 9 and give spatial expression to its requirements. Policy 9 requires Welsh Government and partners to identify areas that must be safeguarded and created as ecological networks for climate adaptation, habitat protection, restoration and creation, species protection and the safeguarding of ecosystem services. These identified areas must then be incorporated into development plans. Because the identification and safeguarding of such areas are an existing policy requirement, the option of not defining an NNRA boundary is not a reasonable alternative. Without a mapped extent, the planning system could not effectively apply Policy 9 or safeguard the land needed to maintain or enhance ecological networks and green infrastructure in the identified sub-region of the Gwent Levels. Policy 9 also makes clear that safeguarding should occur “in the first instance... at a large scale,” a requirement that can only be delivered through a defined, landscape-scale spatial boundary. Strategic Policy 1 does nothing more than apply this requirement to the Gwent Levels.
- 2.6.2 To support the implementation of Policy 9, NRW undertook extensive evidence gathering and spatial analysis to map resilient ecological networks (RENs) across the Gwent Levels. This work followed the nationally established methodology set out in *Terrestrial and Freshwater Resilient Ecological Networks: A Guide for Practitioners in Wales* (Garrett & Ayling, 2021), ensuring that the approach was consistent with REN mapping undertaken elsewhere in Wales.

2.6.3 This work began with the definition of an Initial Area of Search which is effectively a landscape-scale ecological envelope within which Core and Recovery Zones could be identified. The Initial Area of Search identified by NRW was built from datasets that reflect ecological and hydrological functioning, including drainage systems, statutory and non-statutory designations, Section 7 habitats and species, hydrological catchments and ecological connectivity modelling. It was refined further by NRW through stakeholder engagement. Because it represents the actual ecological, hydrological and landscape functioning of the Gwent Levels, it is the only evidence-based spatial area in Welsh Government's opinion capable of fulfilling Policy 9's requirement for large-scale safeguarding. Other potential boundaries such as administrative boundaries, SSSI limits or landscape character areas do not capture the functional extent of the Levels. Accordingly, Welsh Government conclude that the Initial Area of Search provides the best basis for defining the NNRA boundary in Strategic Principle 1, and no reasonable alternative exists.

2.6.4 Policy 9 also requires an understanding of how designated sites sit within wider ecological networks and to identify land needed to support, connect or expand those networks. This makes the identification of a Core Zone operationally necessary. Strategic Principle 2 reflects this by defining the ecological "nodes" of the network. NRW's mapping already integrates designated sites, priority habitats and hydrological features into a coherent Core Zone, and no alternative method could produce a more defensible or policy-aligned outcome.

2.6.5 Similarly, Policy 9 requires that safeguarding extends beyond designated sites to include land needed for ecological connectivity, climate adaptation, habitat creation, buffers and stepping stones. These functions form the basis of the Recovery (Opportunity) Zone. Strategic Principle 3 reflects Policy 9 and also maps where these opportunities and requirements exist. Again, this is derived directly from NRW's REN Recovery Zone mapping, the only systematically developed, evidence base that identifies these essential components. Alternatives such as using designated sites alone or relying solely on existing green-infrastructure evidence would not meet the landscape-scale safeguarding and connectivity requirements of Policy 9.

2.6.6 Taken together, the NNRA boundary, Core Zone and Recovery Zone and the Strategic Principles that apply to them represent the only policy-compliant, evidence-based and operationally deliverable interpretation of Future Wales Policy 9 for the Gwent Levels. They deliver the requirements set out in Policy 9 for the Gwent Levels and currently no reasonable alternatives exist.

Reasonable Alternatives for Actions 1- 5, 7-9 and 12-13:

2.6.7 No reasonable alternatives exist for Actions 1–5, 7–9 or 12–13. PPW already requires development to maintain and enhance biodiversity, safeguard protected habitats and species, support resilient ecological networks, and follow the stepwise approach to avoid, minimise, mitigate, restore or as a last resort compensate for impacts. Section 6.4 also requires applicants to demonstrate how biodiversity and ecosystem resilience will be delivered, with permission refused where unacceptable effects remain, while the DECCA attributes provide the recognised framework for assessing resilience. Future Wales Policy 9 further strengthens expectations for ecological connectivity, green infrastructure and landscape-scale ecological processes.

2.6.8 These Actions provide NNRA-specific clarification of how these national policies apply in the Gwent Levels context by highlighting the area's functional linkages to protected sites, the need to safeguard statutory site features and their supporting habitats, the importance of maintaining hydrological connectivity and water quality, and the landscape-scale integrity of both the Core Zone and the supporting Recovery (Opportunity) Zone. These elements are therefore necessary local clarifications reflecting the NNRA's environmental sensitivities.

Reasonable Alternatives for Actions 6 and 14:

2.6.9 No reasonable alternatives exist for Actions 6 and 14. PPW requires development proposals to maintain and enhance biodiversity and ecosystem resilience and to follow the stepwise approach, with off-site compensation considered only where on-site enhancement has been demonstrated to be unachievable. PPW and Future Wales Policy 9 also support strategically targeted off-site measures where these contribute to resilient, landscape-scale ecological networks. However, national policy does not identify where such off-site NBB should be directed, nor does it distinguish between different parts of the ecological network. On the Gwent Levels, the mapped Core Zone and Recovery (Opportunity) Zone represent the functional ecological structure of the NNRA and therefore provide the necessary spatial clarity for applying national policy in a consistent and ecologically coherent way.

2.6.10 Actions 6 and 14 apply these national principles by identifying the Core Zone and the Recovery (Opportunity) Zone as the potential receiving areas for off-site NBB. This local clarification ensures that off-site measures strengthen the ecological network where they will have the greatest landscape-scale effect, rather than being dispersed in ad hoc or ecologically disconnected

locations. Alternative approaches, such as allowing off-site NBB to be delivered anywhere, or selecting receiving sites without reference to the mapped network, would risk fragmented, inconsistent outcomes and would fail to effectively support the resilience, connectivity and recovery objectives of this NNRA.

Reasonable Alternatives for Action 10:

2.6.11 No reasonable alternatives exist for Action 10. PPW requires the features and supporting ecological processes of designated and irreplaceable habitats to be safeguarded, and in the Core Zone these processes depend on traditional grazing of reen banksides and adjacent grasslands. Grazing maintains the vegetation structure, ground conditions and habitat niches essential to the SSSI features, and Future Wales Policy 9 reinforces the need to protect these landscape-scale ecological functions. Without the continuation of traditional management, the Core Zone's ecological integrity would decline, undermining national policy and the purpose of the NNRA.

2.6.12 Action 10 therefore clarifies how PPW and Policy 9 apply in this context by requiring adjoining land-use proposals to secure appropriate long-term management, agreed with NRW and deliverable in perpetuity. Alternative approaches were considered but ruled out. Fixed buffer distances cannot provide consistent protection because ecological needs vary between individual reens and their banksides. Mechanical or human-led vegetation control also lacks evidence that it can replicate the ecological outcomes achieved through grazing, such as maintaining varied grass heights, soil conditions and invertebrate habitats. These methods are typically less reliable and may lead to deterioration of designated features.

Reasonable Alternatives for Action 11:

2.6.13 No reasonable alternatives exist for Action 11. PPW requires applicants to provide sufficient ecological information at submission to demonstrate how their proposals will maintain and enhance biodiversity and ecosystem resilience, and it requires authorities to refuse permission where unacceptable residual effects remain after applying the stepwise approach. Future Wales Policy 9 reinforces this by requiring decisions that support resilient, landscape-scale ecological networks. Delivering these national policy requirements within the NNRA, particularly the Core Zone, where ecological sensitivities are high, depends on robust, proportionate information being available from the outset to assess whether proposals genuinely contribute to long-term resilience.

2.6.14 During development of the Guidance, a Core-only approach was initially considered, but discounted through the assessment work. Although the Core Zone is the most sensitive part of the Gwent Levels, its resilience depends on ecological processes, such as hydrology, connectivity and management, that operate across the wider NNRA. Development outside the Core can therefore have significant effects on it. Applying the requirement only to the Core would not have supported the landscape-scale objectives of Future Wales Policy 9 or the purpose of the NNRA designation, which is to safeguard the functioning of the entire system. For this reason, Action 11 applies to the whole NNRA.

Table 2-2 Summary of the findings of the assessment

2.7 Summary of Assessment Results and Cumulative Effects Assessment

2.7.1 In addition to appraising each of the Strategic Principles and Actions in the guidance separately they have all been appraised in-combination for their likely cumulative, secondary and synergistic effects against each ISA Objective. A summary of the assessment of the Strategic Principles and Actions is set out in Table 2-2 above.

2.7.2 A summary of the overall assessment including the cumulative effects is set out in Table 2-3 below. Table 2-4 sets out the summary of the cumulative, synergistic and secondary. There were no new recommendations from the assessment of the cumulative, secondary and synergistic effects.

Table 2-3 – Summary of assessment results including cumulative effects by ISA Objective

Summary of Assessment Results and Cumulative Effects Assessment	
Economy - Sustainable Economic Growth ISA Objective 1: To promote sustainable economic growth and strengthen the resilience of the rural economy across the Gwent Levels	
Affected SEA Regulations Schedule 2(6) issues: Population, human health, climatic factors and material assets	
<p>The guidance is expected to have a positive impact on sustainable economic growth. The guidance looks to ensure ecosystem resilience and strengthening biodiversity networks at a landscape scale. It does not directly encourage development but will ensure any development that does take place across the NNRA area is sustainable, appropriate and looks to avoid negative impacts and maximise positive impacts.</p> <p>The assessment recognises that in the short term there may be a mix of positive and negative impacts but these will become positive in the medium to longer term.</p> <p>Actions A9 and A10 have a neutral impact as they relate to water availability and hydrology and agricultural management of the reens and ditches and are not considered to have any direct impact on economic growth and the rural economy.</p> <p>For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the scale and amount of development likely to come forward in the Core Zone will be extremely limited. The assessment outcomes should therefore be read in the context of this very limited development potential.</p>	

Economy – Sustainable Tourism Opportunities

ISA Objective 2: To encourage and promote sustainable tourism opportunities

Affected SEA Regulations Schedule 2(6) issues: Population, human health, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape

The guidance is expected to have a positive impact on sustainable tourism in the Gwent Levels. By safeguarding and strengthening biodiversity and ecosystem resilience, the landscape, cultural and heritage value of the area is protected and enhanced. This enhances its attraction as a tourist destination and the interest in proposals for low-impact recreation could therefore increase. This may create supportive conditions for new and existing businesses linked to the tourism industry such as recreation and the visitor economy. Although it is recognised that economic growth is not the principal driver of the guidance.

The assessment recognises that in the short term there may be a mix of positive and negative impacts, but these will become positive in the medium to longer term.

Actions A9 and A10 have a neutral impact as they relate to water availability and hydrology and agricultural management of the reens and ditches and are not considered to have any direct impact on the provision of sustainable tourism opportunities.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the scale and amount of development likely to come forward in the Core Zone will be extremely limited. The assessment outcomes should therefore be read in the context of this very limited development potential.

Education

ISA Objective 3: To encourage opportunities to increase educational attainment across all age groups by using the Gwent Levels landscape as a natural learning resource

Affected SEA Regulations Schedule 2(6) issues: Population and human health

The guidance is predicted an overall neutral impact on education. It was recognised that increasing green infrastructure and ecosystem resilience could have an indirect positive impact through protecting and enhancing the area and providing an educational resource. This reflects the areas where the guidance influence is indirect or uncertain, rather than indicating adverse effects.

Air Quality

ISA Objective 4: To promote opportunities to encourage the protection and improvement of air quality

Affected SEA Regulations Schedule 2(6) issues: Population, human health, air, and climatic factors

The guidance is considered to have mainly neutral impacts with some positive in the long term or few actions with uncertainty on its overall impact on the protection and improvement of air quality.

This is due to air quality challenges in the area are largely influenced by external factors, including existing industrial activity adjacent to the Levels and wider traffic regulations. The positive effects were predicted with Strategic Principle 2 and Actions A5, A7 and A8 that centre around the Core Zone that ensure the landscape, features and supporting habitats are given due consideration in development proposals and recognises the areas designations, thus supporting improvements in air quality. In Actions A1, A6, A11 and A14 impacts were harder to predict as there is uncertainty on how these 'benefits' may be delivered and the overall impact on air quality.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Biodiversity, Flora and Fauna

ISA Objective 5: To halt and reverse biodiversity loss and contribute to the protection and effective management of 30% of our land, freshwater and sea for nature by 2030

Affected SEA Regulations Schedule 2(6) issues: Biodiversity, human health, fauna, flora, soil, water, air, climatic factors and material assets

The guidance is seen as having a significant positive impact on the target of effective management of 30% of our land, freshwater and sea for nature by 2030.

All of the Strategic Principles and Actions have a positive effect as they focus on the protection of the environment and supporting ecosystem resilience with some impacts increasing to significant in the long term.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Climate and Flood Risk – Flood Risk

ISA Objective 6: To contribute to the reduction and management of flood risk

SEA Regulations Schedule 2(6) issues: Biodiversity, human health, fauna, flora, soil, water, climatic factors, material assets and landscape

The guidance is considered to have an overall positive impact on the management and reduction of flood risk. The guidance overall is expected to positively influence flood risk and management, as it supports ecosystem services and contributes to landscape resilience. It also reflects the historic role of the Gwent Levels in managing water and hydrological processes. Existing management approaches, including the hold-the-line strategy and long-established agricultural water-level regulation, continue to play an important role. It is recognised that climate change is likely to increase overall flood risk though pressures from extreme weather events and the guidance would help to minimise impacts. This includes through the provision of strategic green infrastructure which is recognised as providing a supportive function for managing flood risk by enhancing natural processes within the landscape.

Most Strategic Principles and Actions are expected to deliver positive impacts in the long term as they create opportunities to enhance flood-risk outcomes through its contributions to net benefit for biodiversity from development within the NNRA and increasing landscape connectivity, which is an important component in the wider functioning of the drainage and flood-management system. Action A9 looks to have a significant positive impact in the medium to long term as it ensures water availability and hydrology are considered in development proposals, directly impacting on ensuring effective flood risk management.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Action A4 has been assessed as neutral, as its focus is on species-specific management and does not directly impact on flooding. The impacts of Actions A6 and A14 remain uncertain. It is possible that the delivery of off-site net benefit for biodiversity could provide some positive effects on flood risk, but the outcomes will depend on localised solutions that are still to be defined. Therefore, it is not possible to determine the extent to which Actions A6 and A14 will contribute to reducing or managing flood risk.

Climate and Flood Risk - Drainage

ISA Objective 7: To contribute to the management and maintenance of the Gwent Levels drainage system

SEA Regulations Schedule 2(6) issues: Biodiversity, fauna, flora, soil, water, climatic factors, material assets, cultural heritage including architectural and archaeological heritage and landscape

The guidance is considered to have a significant positive impact on the Gwent Levels drainage system. The guidance directly impacts the management and maintenance of the Gwent Levels drainage system by supporting the movement and storage of water and the wider hydrological system. The Strategic Principles promote improvements and management of the reens, grips, and wider drainage features by ensuring development does not adversely affecting these systems. Its effectiveness, however, is dependent on the actions and land management practices that feed into it, as the drainage network of the Gwent Levels is intrinsic to both the biodiversity and the character of the landscape. By reinforcing ecological networks and supporting improved landscape function. These linkages support the established hydrological processes that characterise the Gwent Levels and contribute positively to the ongoing management and maintenance of the drainage system. Over the long term, the Strategic Principle 3 and a number of Actions are expected to increase their impact to have a significant positive impact in the long term. By reinforcing ecological connectivity and supporting natural drainage processes, helps maintain the overall integrity of the drainage system this impact is magnified over time.

Almost all Actions are expected to contribute positively to supporting the drainage system on the Gwent Levels. For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Action A4 has been assessed as having a neutral impact. This is due to its focus being on species-specific management and does not directly impact on drainage.

Health and Well-being

ISA Objective 8: To contribute to an improvement in physical, mental and social health and well-being

SEA Regulations Schedule 2(6) issues: Population, human health, climatic factors, cultural heritage including architectural and archaeological heritage and landscape

The guidance is expected to have positive impact on health and well-being. The guidance will have a broadly positive influence on physical, mental, and social health and well-being, reflecting the Gwent levels possible role as providing a distinctive, tranquil, and recreational resource for many communities, providing immersive natural environments that provide opportunities for rest, recreation, and connection with nature.

The Core Zone is a place where people experience the strongest sense of landscape identity, historic character, and ecological richness due to its designations and landscapes. However, it is also recognised that the Recovery Zone also have significant potential to deliver enhanced wellbeing benefits by providing a landscape capable of absorbing and supporting increased recreational activity without degrading its environmental quality. Promoting green infrastructure through Strategic Principles will support access to nature, can strengthen links through the NNRA and enhance its ability to support health and well-being outcomes. It is recognised that the Strategic Principles have different functions and roles to play with the wider NNRA and Recovery Zone supporting the Core Zone which is the main destination.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Actions A3, A7, A10, and A11 are all expected to have an overall neutral impact, as they were assessed to have no direct impact towards delivery of this objective. The impact of Action A5 is considered to be uncertain because it cannot be ascertained what exactly the effect will be on health and well-being when details of any proposals are unknown.

Populations

ISA Objective 9: To encourage opportunities within which social cohesion and equality can be improved

SEA Regulations Schedule 2(6) issues: Population, human health, cultural heritage including architectural and archaeological heritage and landscape

The guidance is considered to have a neutral impact on social cohesion and equality. This is due to the primary focus of the Strategic Principles and Actions are on strengthening habitat networks and ecosystem services across the Gwent Levels, therefore its direct contribution to social cohesion is limited. It is recognised that the strengthened landscape character and improved environmental quality and the delivery of strategic green infrastructure can indirectly support community interaction by providing high-quality natural spaces.

Strategic Principle 2 and Actions A1, A6, A8, A9 and A14 are all predicted to have positive impacts for social cohesion and equality. This is due to the rural setting of the Core Zone, opportunities to promote social cohesion and equality are inherently more constrained than in areas closer to settlements. Nevertheless, by safeguarding the integrity of the Core Zone and maintaining access to a distinctive, well-managed natural environment, the Strategic Principle creates conditions that can facilitate social and well-being benefits.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development

within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

There is some uncertainty about the impact from Action A5, as it cannot be ascertained what exactly the effect will be on social cohesion and equality when details of any proposals are unknown.

Crime

ISA Objective 10: To promote opportunities for the reduction of fly-tipping and littering

SEA Regulations Schedule 2(6) issues: Biodiversity, human health, fauna, flora, soil and water.

The guidance is predicted have a neutral impact on the reduction of fly-tipping and littering. This is due to the focus of the Strategic Principles and Actions being on environmental safeguarding, protection of ecosystem services and landscape enhancement. Responsibility for addressing fly tipping lies primarily with local authorities, which have their own policies and enforcement mechanisms to manage waste-related behaviours.

Welsh Language

ISA Objective 11: To contribute towards the future well-being of the Welsh Language

SEA Regulations Schedule 2(6) issues: Population and cultural heritage including architectural and archaeological heritage

The guidance is predicted to have a neutral impact the Welsh Language. This is due to its focus which will not directly be on strengthening or promoting the Welsh language. Other requirements will ensure new signage or associated documentation will be available bilingually. (Also see ISA Objective 13 and cultural heritage)

Landscape Character – Landscape and Seascapes

ISA Objective 12: To create opportunities for the protection and enhancement of the Gwent Levels' unique and distinctive landscape and seascapes

SEA Regulations Schedule 2(6) issues: Soil, material assets, cultural heritage including architectural and archaeological heritage and landscape

The guidance is expected to have a significant positive impact on the Gwent Levels' unique and distinctive landscape and seascapes. The guidance looks to safeguard biodiversity, strengthen ecosystem resilience, and support environmental integrity, helping maintain the area's distinct character. Most Actions also offer secondary benefits, such as protecting key landscape and seascapes features. The Actions that have a significant positive impact are A1 and A3 as these actions specifically focus on supporting the landscape, with many others growing from a positive to a significant positive over time.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution

towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Action A4 is the only Action that is expected to have a neutral impact as it pertains to the protection of species, it will have no direct impact on the landscape and seascape.

Landscape Character – Heritage Assets

ISA Objective 13: To create opportunities to protect, conserve and enhance the historic environment of the Gwent Levels at a landscape scale, including its heritage assets, their settings, and the area's cultural significance

SEA Regulations Schedule 2(6) issues: Population, human health, material assets, cultural heritage including architectural and archaeological heritage and landscape

The guidance is predicted to have an overall significant positive effect on historic environment of the Gwent Levels, including its heritage assets, their settings. The guidance looks to safeguarding biodiversity networks and strengthening long-term ecosystem resilience at the landscape scale directly contributing to maintaining the characteristic qualities of the area.

Over time, a synergistic effect is anticipated, whereby a stronger and better-managed landscape creates greater opportunities to protect and enhance the historic environment of the Gwent Levels.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Action A3 is focused specifically on the functional linkages between protected sites, this would have no direct impact heritage assets and Action A4 is focused specifically on the protected habitats and species, this would have no direct impact on the historic environment.

Greenhouse Gas Emissions

ISA Objective 14: To protect and enhance opportunities for greenhouse gas emissions to be reduced, stored and sequestered across the Gwent Levels

SEA Regulations Schedule 2(6) issues: Human health, fauna, flora, soil, air, climatic factors and material assets

The guidance is considered to have a positive impact on greenhouse gas emissions. The guidance supports the protection of habitats which help maintain the natural conditions that support long term carbon storage and strengthens the ecological processes that regulate the local climate. Over time this is likely to produce a significant positive impact for Strategic Principle 2 and Actions A8 and A9 as habitat condition improves and it will help support the long-term resilience.

The impact of Actions A6 and A14 remains uncertain when details of any proposals are unknown.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

A number of Actions were assessed as having a neutral outcome. Actions A3, A4, A5 and A10 were considered.

Water

ISA Objective 15: To protect and improve water quality and water resources

SEA Regulations Schedule 2(6) issues: Biodiversity, population, human health, fauna, flora, soil, water, climatic factors and landscape

The guidance is expected to have an overall significant positive impact water quality and resources. This reflects the fact that water features are a defining component of the landscape and are closely linked to habitat connectivity. Water is the circulating system of the key ecosystem of the Gwent levels. The guidance places strong emphasis on safeguarding the reen system and associated drainage features, supporting the wider aim of enhancing ecological networks. Over time, these protections are expected to reinforce the condition of sensitive water environments and help maintain the hydrological processes needed for healthy ecological functioning. This will result in a significant positive effect into the medium and long term.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

The effects of Actions A6 and A14 remain uncertain when details of any proposals are unknown.

Soil and Land Management

ISA Objective 16: To protect geology and soil and promote the sustainable use and management of land

SEA Regulations Schedule 2(6) issues: Biodiversity, fauna, flora, soil, water, climatic factors, material assets and landscape

The guidance is expected to have an overall positive impact on soil and land management. By promoting sustainable land management practices, safeguarding and strengthening biodiversity networks and ecosystem resilience.

For Actions 7–11, it should be noted that the Core Zone is already subject to extensive protection through multiple statutory designations, including SSSIs. As set out in PPW, there is therefore a general presumption against development within this Zone. Consequently, the overall scale and amount of contribution towards the delivery of this Objective as a result of any proposed development will therefore be extremely limited. The assessment outcomes should therefore be read in the context of this very limited potential.

Since A4 pertains to the protection of species, it may be marginally positively impactful regarding vegetation increasing soil health as a secondary effect but overall, it is considered to have a neutral impact.

Actions A6 and A14 have uncertain impacts when details of any proposals are unknown.

Table 2-4 summary of the assessment of the cumulative, secondary and synergistic effects

	ISA Objectives	Cumulative effects score		
		Short term	Medium term	Long term
1	To promote sustainable economic growth and strengthen the resilience of the rural economy across the Gwent Levels	+-	+	+
2	To encourage and promote sustainable tourism opportunities	+	+	+
3	To encourage opportunities to increase educational attainment across all age groups by using the Gwent Levels landscape as a natural learning resource	0	0	0
4	To promote opportunities to encourage the protection and improvement of air quality	0	0	0
5	To halt and reverse biodiversity loss and contribute to the protection and effective management of 30% of our land, freshwater and sea for nature by 2030	++	++	++
6	To contribute to the reduction and management of flood risk	+	+	+
7	To contribute to the management and maintenance of the Gwent Levels drainage system	+	++	++
8	To contribute to an improvement in physical, mental and social health and well-being	+	+	+
9	To encourage opportunities within which social cohesion and equality can be improved	0	0	0
10	To promote opportunities for the reduction of fly-tipping and littering	0	0	0
11	To contribute towards the future well-being of the Welsh Language	0	0	0
12	To create opportunities for the protection and enhancement of the Gwent Levels' unique and distinctive landscape and seascape	+	++	++
13	To create opportunities to protect, conserve and enhance the historic environment of the Gwent Levels at a landscape scale, including its heritage assets, their settings, and the area's cultural significance	+	++	++
14	To protect and enhance opportunities for greenhouse gas emissions to be reduced, stored and sequestered across the Gwent Levels	+	+	+
15	To protect and improve water quality and water resources	+	++	++

16	To protect geology and soil and promote the sustainable use and management of land	+	+	++
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Table 2-5 Recommendations - response and changes made to guidance

Recommendation	Response
Strategic Principles	
Include a link and reference within Strategic Principle 1 to the definitive mapped Gwent Levels NNRA area to which this Principle and subsequent Actions are to apply.	All of the Strategic Principles have been amended to include a reference to the map that defines the spatial area for the designation.
Include a link and reference within Strategic Principle 2 to the definitive mapped Gwent Levels Core Zone area to which this Principle and subsequent Actions are to apply.	
Include a link and reference within Strategic Principle 3 to the definitive mapped Gwent Levels Recovery (Opportunities) Zone area to which this Principle and subsequent Actions are to apply.	
Ensure that supporting text to Strategic Principle 3 and/or accompanying Actions recognises that the Recovery (Opportunities) Zone, its feature and characteristics, are important in their own right and not just for their supporting role in relation to the resilience of the Core Zone.	This has been added to the supporting text of Strategic Principle 3.
The supporting text for Strategic Principle 2 could be strengthened to acknowledge the role of Green Infrastructure on health, equality and social cohesion.	This has been acknowledged in the drafting the Guidance. The benefits of Green Infrastructure are recognised and consequently a number of additions have been made throughout the Guidance as it applies more widely than to just Strategic Principle 2.
Make sure that the term 'ecosystem services' is understood throughout the Guidance. It may assist to make reference to benefits and services associated with ecosystems. This may aid with the understanding of the importance of ecosystem resilience and its importance.	There is a table in the guidance that explains typical ecosystem services and their benefits. There is also further explanation of these in the supporting text to the various Actions.
Actions	
Action 3. Remove references to named functionally linked sites from the Action itself (e.g. River Usk SAC). Replace	This change has been made to the Action and supporting text.

<p>with wording such as national, European and international designated sites which ensure that all sites are covered by the Action. Reference to named sites can be made by way of examples in the supporting text.</p>	
<p>Action 4 should be reworded so that it refers to all protected species and not just key species. It should also make reference to protected habitats as these are not picked up specifically in other SP1 Actions at present. It should also be strengthened to require robust evidence. The supporting text should set out the various protections incl s7, Wildlife and Countryside Act and European protections. It should also make clear that HRA requirements should be applied in plan making and in decision making with regards European sites.</p>	<p>This change has been made to the Action and supporting text.</p>
<p>Action 5 Change wording from in-combination to cumulative to avoid confusion and comparison with the HRA process.</p>	<p>This change has been made to the Action.</p>
<p>Action 5. Remove the text 'including cumulative impacts on landscape character, visual amenity and open spaces' from the Action and include instead in the supporting text. Expand that supporting text reference to also include cumulative impact on biodiversity and ecosystem services.</p>	<p>This change has been made to the Action and supporting text.</p>
<p>Amend the third point in Action 9 so that it is about the water network specifically rather than landscape connectivity more generally. This is consistent with the purpose of the Action which is specifically about water.</p>	<p>This change has been made to the Action.</p>
<p>Action 11- To move the Action for inclusion under Strategic Principle 1 to ensure the wider application to and support the broader benefits for the Gwent Levels as an NNRA, as afforded by Policy 9 of Future Wales. This is particularly so given that there is a general presumption against development in the Core Zone due to its statutory protections and that the purpose of identifying the NNRA area is</p>	<p>Action 11 has been moved to sit under Strategic Principle 1. Consequently, it has been re-numbered as Action 6 in the Guidance. This has affected the renumbering of Actions 7 onwards then as well.</p>

<p>to help increase the resilience of this wider area including the Core. Therefore, the Action would deliver more benefits if applied to the NNRA as a whole.</p>	
<p>It is considered that the wording of A13 could be generalised to protected species and ensure it is about protection rather than safeguarding for protected sites</p>	<p>This change has been made to the Action</p>
<p>Remove references to Action 6 from Action 14. Instead, cross refer to Action 6 within the supporting text.</p>	<p>This change has been made to the Action and supporting text.</p>

2.8 Monitoring – Significant Effects

2.8.1 The ISA has identified the likely effects of the Gwent Levels Planning Guidance against the 16 ISA Objectives over the short, medium and long terms. An indication of the certainty of these effects was also provided. However, there is a risk that the sustainability impacts of the Guidance, including the impacts of specific Strategic Principles or Actions or their cumulative impacts, are different to those anticipated, such as due to unforeseen circumstances. It is therefore an essential component of delivering sustainable development to monitor the impacts of the Guidance in relation to the predicted impacts. Monitoring then enables the Guidance to be altered as necessary should unexpected negative effects arise or expected positive effects not arise.

2.8.2 The implementation and impacts of the Guidance will be monitored by the Welsh Government. When a Strategic Development Plan (SDP) is prepared for the constituent authorities making up the Gwent Levels Area, the Welsh Government expects local planning authorities to take forward this monitoring as part of the SDP process. In advance of LDP preparation, constituent authorities should also look to monitor the effects of the Guidance as part of their Local Development Plan preparation processes and liaise collectively and with the Welsh Government accordingly in the sharing of data. Any impacts will feed into future planning policy review and revision.

2.8.3 Table 2-6 below provides a baseline set of indicators by which the ISA Objectives could be monitored. The baseline data sets used are specific facts and figures gathered by different organisations and statutory bodies, amongst others. These have been carefully selected to give an appropriate overview of baseline conditions and trends over time at a local authority and area-specific scale (i.e. the Gwent Levels landscape).

2.8.4 Many of the data sets were only available at local authority scale, and this had to be relied upon, in the absence of area specific data pertaining to the Gwent Levels that is collected consistently and at regular intervals. Some of the local authority data won't fully reflect the rural Gwent Levels landscape as it encompasses information and trends for heavily populated and urbanised areas in Cardiff and Newport, specifically. Notwithstanding this, the data itself remains relevant because of the sphere of influence between the Gwent Levels and larger surrounding conurbations, for example, the health and well-being benefits that the Gwent Levels brings to adjoining urban communities. It is intended that the baseline data can be used as factual yardsticks to support

the appraisal of the likely effects of the Guidance over time against each of the relevant ISA Framework Objectives.

2.8.5 We would welcome views as part of the Draft Gwent Levels Planning Guidance Consultation on specific indicators which could be used to monitor the ISA Objectives. Following the consultation and stakeholder input, the monitoring approach for the Guidance and ISA will be refined and finalised.

Table 2-6 – Proposed Monitoring Framework

ISA Objective	Effects to be monitored	Example indicators for monitoring
1 To promote sustainable economic growth and strengthen the resilience of the rural economy across the Gwent Levels	The Gwent Levels Planning Guidance would likely lead to a long-term positive impact on promoting sustainable economic growth and strengthening the resilience of the rural economy across the Gwent Levels.	<ul style="list-style-type: none"> • Economic activity, such as income and Gross Value Added per head. • Amount of employment land, including farming land. • Sectors of employment within the Gwent Levels landscape. • Commuting flows in and out of constituent local authority areas. • Gross annual wage.
2 To encourage and promote sustainable tourism opportunities	The Gwent Levels Planning Guidance would likely lead to a long-term positive impact on encouraging and promoting sustainable tourism opportunities.	<ul style="list-style-type: none"> • Numbers of visitors to key attractions in the Gwent Levels. • Generation of money from tourism and the visitor economy.
3 To encourage opportunities to increase educational attainment across all age groups by using the Gwent Levels landscape as a natural learning resource	The Gwent Levels Planning Guidance would likely have no short or long-term impact on encouraging opportunities to increase educational attainment by using the Gwent Levels landscape.	<ul style="list-style-type: none"> • Levels of qualification for the working age population.
4 To promote opportunities to encourage the protection and improvement of air quality	The Gwent Levels Planning Guidance is likely to have some long-term positive impacts on promoting opportunities to encourage the protection and improvement of air quality.	<ul style="list-style-type: none"> • Numbers of Air Quality Management Areas in the Gwent Levels landscape. • Traffic volumes for areas that adjoin the Gwent Levels landscape by kilometres of vehicular movement per year.

			<ul style="list-style-type: none"> Travel to work data by numbers of people and method of transport used.
5	To halt and reverse biodiversity loss and contribute to the protection and effective management of 30% of our land, freshwater and sea for nature by 2030	The Gwent Levels Planning Guidance would likely lead to significant long-term positive impacts on halting and reversing biodiversity loss and contributing to the protection and effective management of 30% of land, freshwater and sea for nature by 2030.	<ul style="list-style-type: none"> Conditions of habitats of principal importance. Numbers of species in peril. Habitat fragmentation, which can be monitored using the DECCA Framework and the REN Mapping.
6	To contribute to the reduction and management of flood risk	The Gwent Levels Planning Guidance would likely lead to a long-term positive impact on contributing to the reduction and management of flood risk.	<ul style="list-style-type: none"> Areas at flood risk across the Gwent Levels. Infrastructure to manage flood risk across the Gwent Levels, including the rivers and reens network.
7	To contribute to the management and maintenance of the Gwent Levels drainage system	The Gwent Levels Planning Guidance would likely lead to a long-term significant positive impact on contributing to the management and maintenance of the Gwent Levels drainage system.	<ul style="list-style-type: none"> Extent and condition of reen and ditch network.
8	To contribute to an improvement in physical, mental and social health and well-being	The Gwent Levels Planning Guidance would likely lead to a long-term positive impact on contributing to an improvement in physical, mental and social health and well-being.	<ul style="list-style-type: none"> Life expectancy for males and females. Percentage reporting as being in 'good' or 'very good' health. Amount of amenity space, including green and open space. Welsh Index of Multiple Deprivation, identifying concentrations of deprivation for each Lower Super Output Area that comprises of the Gwent Levels.

9	To encourage opportunities within which social cohesion and equality can be improved	The Gwent Levels Planning Guidance is likely to have some long-term positive impacts on encouraging opportunities to improve social cohesion and equality.	<ul style="list-style-type: none"> Population for authorities that comprise of the Gwent Levels Area and projected population growth over the next 5 years. Percentage breakdown of the population by age. Percentage breakdown of the population by ethnicity. Welsh Index of Multiple Deprivation, identifying concentrations of deprivation for each Lower Super Output Area that comprises of the Gwent Levels.
10	To promote opportunities for the reduction of fly-tipping and littering	The Gwent Levels Planning Guidance would likely have no short or long-term impact on promoting opportunities for the reduction of fly-tipping and littering.	<ul style="list-style-type: none"> Incidents of record crime. Main issues in relation to incidences of crime.
11	To contribute towards the future well-being of the Welsh Language	The Gwent Levels Planning Guidance would likely have no short or long-term impact on contributing towards the future well-being of the Welsh Language.	<ul style="list-style-type: none"> Numbers of Welsh language speakers.
12	To create opportunities for the protection and enhancement of the Gwent Levels' unique and distinctive landscape and seascapes	The Gwent Levels Planning Guidance would likely lead to a long-term significant positive impact on creating opportunities for the protection and enhancement of the Gwent Levels' unique and distinctive landscape and seascapes.	<ul style="list-style-type: none"> LANDMAP data providing information on factors including landscape quality (visual and sensory) and historic landscape. Characteristics of the Marine Character Area.
13	To create opportunities to protect, conserve	The Gwent Levels Planning Guidance would likely lead to a long-term significant positive impact on creating opportunities to protect, conserve and	<ul style="list-style-type: none"> Heritage asset numbers and those at risk (including statutory and non-statutory designations such as historic

	and enhance the historic environment of the Gwent Levels at a landscape scale, including its heritage assets, their settings, and the area's cultural significance	enhance the historic environment of the Gwent Levels at a landscape scale and its cultural significance.	<p>parks and gardens, listed buildings, scheduled monuments and conservation areas).</p> <ul style="list-style-type: none"> • Use of Gwent Levels specific place names.
14	To protect and enhance opportunities for greenhouse gas emissions to be reduced, stored and sequestered across the Gwent Levels	The Gwent Levels Planning Guidance would likely lead to a long-term positive impact on protecting and enhancing opportunities for greenhouse gas emissions to be reduced, stored and sequestered across the Gwent Levels.	<ul style="list-style-type: none"> • Level of greenhouse gas emissions. • Energy production. • Approved energy related developments.
15	To protect and improve water quality and water resources	The Gwent Levels Planning Guidance would likely lead to a long-term significant positive impact on protecting and improving water quality and water resources.	<ul style="list-style-type: none"> • Diffuse water pollution. • Water quality data.
16	To protect geology and soil and promote the sustainable use and management of land	The Gwent Levels Planning Guidance would likely lead to a long-term significant positive impact on protecting geology and soil and promoting the sustainable use and management of land.	<ul style="list-style-type: none"> • Standard of the SSSIs • Coverage of environmentally sensitive permanent grassland (ESPG) • Number of Geological Conservation Review sites. • Agricultural Land Classification data.

3. Conclusion

- 3.1.1. This document comprises the draft ISA: Environmental Report of the Gwent Levels Strategic Planning Guidance. It satisfies the requirements of an Environmental Report as per the SEA Directive for this stage in the process. Further information will be provided in the ISA of the final guidance to ensure full compliance with the Directive.
- 3.1.2. The ISA is a process that has been undertaken by the team drafting the guidance and has been highly integrated alongside the development of the Guidance. During this process, the ISA has enabled the team to embed the principles of environmental, sustainability and wider considerations into the Guidance from the outset. The ISA has provided a structured means of considering the benefits, costs and risks of the Strategic Principles and Actions.
- 3.1.3. The ISA also provides a consultation tool, providing the general public and statutory bodies with an analysis of how the Guidance has been developed in a way that will ensure that it can contribute to more sustainable development. The consultation process gives stakeholders the opportunity to provide feedback and suggestions towards enhancing the overall sustainability of the final Guidance.
- 3.1.4. The Guidance (assessed January 2026), including its Strategic Principles and Actions, have been appraised for its likely effects against each of the ISA Objectives.
- 3.1.5. The Strategic Principles proposed in the Guidance would be expected to result in predominantly positive sustainability impacts, with significant positive impacts on ISA objective 5, 7, 8 and 12 to 16. The others were mainly positive with ISA objectives around fly tipping, the Welsh language and educational attainment as neutral impacts. This was broadly the same outcome for the Actions in the Guidance which are expected to have predominately positive impacts. There are a few uncertain impacts in some ISA objectives 4, 6, 8, 9, 14, 15 and 16 for some Actions and some neutral impacts around social cohesion, health and wellbeing and economic growth. These reflected the focus of the Action being proposed.
- 3.1.6. The Guidance was identified as being likely to result in highly positive impacts on the more social and economic ISA objectives, including those related to education, health, employment, economy, connectivity, social

cohesion, housing and culture. For many of these the identified impacts would be likely to become significantly positive over the medium and long terms.

3.1.7. It should also be noted that the Guidance is intended to be applied alongside a wider suite of policy including PPW which will also help to mitigate uncertain or negative effects at the more local level. The Guidance does not intend to duplicate this policy.

3.1.8. Where negative effects have been predicted these are due to the nature of the Guidance and are recognised as becoming positive in the medium to long term.

3.1.9. Recommendations from the assessment have all been addressed to ensure they result in maximising the sustainability performance of the Guidance. This included changes to the wording in the Strategic Principles and Actions. These appraisals and accompanying recommendations are provided in their entirety in Annex A.

4. Next Stages

ISA Report

4.1.1 This Draft ISA Environmental Report is published to accompany and inform the consultation on the Draft Gwent Levels Guidance (Stages C and D).

4.1.2 Following the consultation the ISA will be updated to reflect any significant changes to the Guidance as part of the consultation and a final ISA Environmental Report will be produced to accompany the final Gwent Levels Guidance.

Monitoring

4.1.3 Stage E of the ISA process includes the finalisation of a monitoring framework that will be used to identify issues, both positive and negative and significant effects of the Guidance over time. Following the publication of the Guidance, a post-adoption ISA Statement will be prepared, alongside a Statement of Environmental Particulars, providing detail of how the ISA process has influenced the development of the Guidance, the predicted significant effects, as well as the monitoring framework, a draft of which is in section 2.10.