



Llywodraeth Cymru
Welsh Government

Draft Strategic Planning Guidance for the Gwent Levels National Natural Resource Area (Future Wales Policy 9)

Consultation Draft 17 February - 31 March 2026

Foreword by the Cabinet Secretary for Economy, Energy and Planning

I am pleased to introduce this draft Strategic Planning Guidance for the Gwent Levels National Natural Resource Area. This consultation marks an important step in shaping how we safeguard and enhance one of Wales' most distinctive and valuable landscapes for generations to come.

Stretching across an historic landscape of reens, wetlands and grazing marsh, the Gwent Levels support an exceptional richness of wildlife, provide vital flood storage and carbon sequestration functions, and form an essential part of the wider ecological network of the Severn Estuary. Yet, despite extensive protections, the Levels remain vulnerable to ongoing pressures.

Planning has a central role in responding to these pressures. It shapes the places we live, work and move through, influences our resilience to climate change, and underpins the health and wellbeing of our communities. The Guidance we are consulting on today ensures that our planning system plays its full part in protecting and strengthening the Gwent Levels, and in delivering the ambitions of Future Wales, Planning Policy Wales and our national commitments to biodiversity recovery.

This Guidance provides clarity on how Policy 9 of Future Wales should be applied across the National Natural Resource Area. It sets out a clear, consistent approach for securing resilient ecological networks, restoring the most sensitive parts of the Levels, directing nature-based solutions, and ensuring that all new development contributes positively to the long-term health of this landscape.

We are committed in Welsh Government to tackling the twin crises of biodiversity loss and climate change, to strengthening our natural resources, and to ensuring that future development is both sustainable and beneficial. This Guidance reflects those ambitions. It will help us protect irreplaceable habitats, improve the resilience of ecosystems, and support strategic green infrastructure that delivers multiple benefits for people and nature alike.

I invite you to consider this draft carefully and share your views. Your feedback is crucial in ensuring that this Guidance is practical, effective and capable of delivering a thriving and resilient Gwent Levels. Together, we can secure a landscape that continues to enrich our communities, support our well-being, and provide a strong foundation for future generations.

Rebecca Evans MS
Cabinet Secretary for Economy, Energy and Planning

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Abbreviations

Abbreviations	Definitions
CO ₂	Carbon Dioxide
DECCA	Diversity, Extent, Condition, Connectivity and Adaptability
EIA	Environmental Impact Assessment
GGGP	Gwent Green Grid Partnership
GGNRAP	Greater Gwent Nature Recovery Action Plan
GI	Green Infrastructure (Term includes blue infrastructure when applicable)
GWT	Gwent Wildlife Trust
HRA	Habitats Regulations Assessment
ISA	Integrated Sustainability Appraisal
LDP	Local Development Plan
LNP	Local Nature Partnerships
LPA	Local Planning Authority
MPA	Marine Protected Area
NBB	Net Benefit for Biodiversity
NNRA	National Natural Resource Areas
NRW	Natural Resources Wales
PPW	Planning Policy Wales
REN	Resilient Ecological Networks
SAC	Special Area of Conservation
SDP	Strategic Development Plan
SEA	Strategic Environmental Assessment
SINC	Site of Importance for Nature Conservation
SMNR	Sustainable Management of Natural Resources
SoNaRR	State of Natural Resources Report
SPA	Special Protection Area

SSSI	Site of Special Scientific Interest

1. Purpose, Scope, and Status of The Guidance

This Section sets out the purpose of the Strategic Planning Guidance for the Gwent Levels National Natural Resource Area (Future Wales Policy 9), hereafter referred to as 'The Guidance'. It outlines why The Guidance is necessary, the issues it seeks to address, and the extent of its application. It also confirms the status of The Guidance.

The Gwent Levels has many statutory and non-statutory designations covering biodiversity, landscape and historic landscape value at the Wales, UK and European level which between them spatially include the vast majority of the Levels. The Levels play an important role both regionally and nationally in climate change adaptation and mitigation (flood storage and carbon sequestration) and in addressing the nature emergency. They are important in providing supporting habitats to the Severn Estuary Marine Protected Area (MPA), made up of a Special Area of Conservation (SAC), Special Protection Area (SPA), Ramsar site and Site of Special Scientific Interest (SSSI) as well as the River Usk SAC.

Despite the designations, the Gwent Levels continues to be vulnerable to encroachment by development. This is largely due to its location between the urban areas of Cardiff and Newport, its flat topography, good infrastructure along with grid connectivity and capacity. Additionally, degradation and fragmentation of the Levels is continuing to happen due to some historical lack of appropriate land management and water pollution events. All of this is negatively impacting the ability of the eight terrestrial SSSIs (and other designated and protected sites and features) to achieve favourable condition status across the Levels. Subsequently, the SSSIs are reduced in terms of favourable condition and flood storage and are less able to fully perform their ecological function and provide ecosystem benefits (services). This reduced condition of the SSSIs has contributed to an overall loss of biodiversity, ecosystem resilience and reduced the long-term climate resilience of the area.

Due to these multiple and conflicting stresses, strengths and potentialities, Policy 9 of Future Wales: The National Plan 2040 (the National Development Framework, hereafter referred to as 'Future Wales') identifies the Gwent Levels as one of nine National Natural Resources Areas (NNRAs) across Wales. **The Guidance is intended to supplement and add further detail to the implementation of Policy 9 and must be applied alongside Planning Policy Wales (PPW). The Guidance does not introduce new policy or repeat policy protections which already exist. Rather, it works within and complements those policies as a guidance note to aid their delivery. Therefore, the status of The Guidance is that it is strategic planning guidance which supplements Future Wales.**

Policy 9 and The Guidance form part of a wider suite of solutions being pursued by the Welsh Government in addressing both climate and nature emergencies and set out how the planning system should contribute to priorities set out by other work areas. These priorities include delivery of the 30 by 30 Global Biodiversity Target and the forthcoming statutory biodiversity targets and delivery mechanisms for Wales.

The Guidance is not intended as a means of justifying development on the Levels that would otherwise be unacceptable in the context of PPW Chapter 6 and the various designations and protections afforded to the Gwent Levels. Instead, The Guidance is intended to assist with safeguarding and creating of resilient ecological networks across the Gwent Levels landscape. PPW Chapter 6 already provides national planning policy for various designations which apply to the Gwent Levels, including those for the historic environment, landscape and biodiversity. However, PPW recognises that **some minor development may be appropriate** in specific, limited circumstances, particularly where small-scale works are necessary for ongoing site management. As such, those designations and protections will benefit from further guidance even though any development coming forward will be limited (see Section 3 for further details). Additionally, not all parts of the Gwent Levels NNRA are covered by statutory designations such as SSSIs and the protection they are afforded; therefore, those areas should also benefit from The Guidance.

In summary, The Guidance supports and supplements existing policy by establishing a clear framework for identifying and securing resilient ecological networks across the Gwent Levels. It sets out the safeguarding opportunities to be pursued, the survey and supporting information required, and the conditions and mitigation measures to be considered in development plan preparation and determining development proposals. Its overarching aim is to ensure that all participants in the planning process effectively implement Future Wales Policy 9.

2. Developing the Guidance

Integrated Sustainability Appraisal (ISA) and Strategic Environmental Assessment (SEA) Process:

The implementation of The Guidance will shape future development and land-use decisions across a nationally important and environmentally sensitive landscape. As such The Guidance is likely to fall within the scope of the Strategic Environmental Assessment (SEA) Regulations. On this basis, it was concluded that the preparation of The Guidance should be subject to both an Integrated Sustainability Appraisal (ISA) and a Strategic Environmental Assessment (SEA). Incorporating the SEA within an ISA ensured that statutory environmental requirements were met while also embedding wider social, cultural and economic considerations from the outset.

The ISA process for The Guidance has included evidence gathering, scoping and early stakeholder engagement. This work established the environmental, social, cultural and economic baseline and identified the key sustainability issues and opportunities relevant to The Guidance. These elements have informed the development of the ISA Framework, which sets out the sustainability objectives and decisions aiding questions used in the appraisal. All of this has been captured in the [Scoping Report](#).

The ISA Framework consists of 16 integrated objectives that reflect the requirements of the SEA Directive as well as statutory Welsh Government assessment requirements, covering areas such as equalities, Welsh language, children's rights, health, rural proofing, sustainable land management, climate change and economic development and wider non-statutory requirements. It incorporates broader social, economic and cultural themes, alongside environmental factors, to ensure that sustainable development principles are embedded within The Guidance.

The ISA has been undertaken iteratively, enabling findings to influence the development of The Guidance throughout, refining content and ensuring alignment with sustainability priorities, including Future Wales Policy 9. This integrated approach has supported the development of a robust and environmentally responsible version of The Guidance and is documented in the [Environmental Report](#).

Habitats Regulations Assessment (HRA):

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.

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.

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 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.

Other Key Inputs to the Draft Guidance:

In addition to the ISA and HRA, several other important sources of evidence and insight have informed the preparation of the draft Guidance. Natural Resources Wales' (NRW) [resilient ecological mapping](#) (REN), together with the outcomes from the integral stakeholder workshops, has been instrumental in identifying the spatial extent of the NNRA and associated Zones, as well as highlighting key issues, pressures and local priorities. Further insight has been provided by the [Gwent Levels Post Construction Monitoring](#) study undertaken for the Levels, which identifies current issues, emerging threats and potential opportunities for environmental improvement and better land management. Ongoing discussions with a range of stakeholders have also contributed to shaping the content and direction of the draft Guidance by providing local knowledge, practical experience and thematic expertise.

3. Development Plan and Policy Context

The Guidance is supplementary to and implements [Future Wales](#) Policy 9 'Resilient ecological networks and green infrastructure' and it should also be applied alongside PPW. This Section therefore provides a brief overview of the key linkages between The Guidance, Future Wales (Policy 9), PPW and also NRW's Area Statements.

Policy 9 Future Wales (a landscape scale approach)

To help nature recover, we need to take a broader, landscape-scale view. The Guidance provides further detail to Policy 9, helping to ensure the planning system plays its part in contributing to nature recovery and to enhance biodiversity and resilience of ecosystems at a landscape-scale.

Connecting habitats is essential to halting the decline in wildlife. Many designated and protected sites, such as SSSIs, exist in isolation, making it harder for species to survive and adapt. Enhancing these protected areas and establishing links between them creates a stronger network of habitats, enabling plants and animals to move more freely and respond more effectively to challenges such as climate change. One way to achieve this is through green corridors and stepping-stone habitats that bridge gaps across the landscape. These connections do not just benefit wildlife—they also support vital services for people, such as pollination and clean water (known as ecosystem benefits/services).

Policy 9 of Future Wales sets out a requirement for Welsh Government to work with key partners to ensure:

- the enhancement of biodiversity,
- the resilience of ecosystems, and
- the provision of green infrastructure.

Policy 9 is about more than simply protecting individual designated or protected sites and species. It focuses on creating a connected network of habitats across the wider landscape—linking sites such as SSSIs with other natural areas so wildlife can move freely between them. A well-connected ecological network is far stronger and more resilient than isolated habitat patches, enabling species to move more easily, adapt to changing conditions, and support the long-term health of ecosystems.

Policy 9 has identified nine areas across Wales where a landscape-scale approach should be progressed. These geographical areas have been designated as NNRA's, and the Gwent Levels is one of them.

PPW, Chapter 6

[PPW Chapter 6](#) makes clear that certain locations are fundamentally unsuitable for development and should be avoided at the outset of site selection. Chapter 6 reinforces this principle through the **step-wise approach**, which requires harm to biodiversity and ecological networks to be **avoided first** before considering mitigation or compensation (see PPW paragraph **6.4.11**). PPW confirms that **designated sites are to be excluded from site searches**, reflecting a presumption against development in environmentally sensitive areas such as SSSIs (para 6.4.24-6.4.26 and Figure 13 of PPW). This principle is also extended to sites containing protected species and habitats that are irreplicable (see PPW paragraph 6.4.15 (1b)). However, PPW recognises that **some minor development may be appropriate** in specific, limited circumstances, particularly where small-scale works are necessary for ongoing site management.

PPW includes the principle that a **net benefit for biodiversity** (NBB) is to be achieved from the planning system (see PPW paragraph 6.4.5 for a definition of NBB). NBB is the concept that development should leave biodiversity and the resilience of ecosystems in a significantly better state than before. PPW sets out how NBB can be achieved through various mechanisms, including in:

- Preparation of Green Infrastructure Assessments and in integrating green infrastructure into development proposals (see PPW paragraphs 6.2.5 to 6.2.14);
- Considering biodiversity and ecological networks when preparing development plans and development proposals (see PPW paragraphs 6.4.1 to 6.4.4);
- Taking into account the Duty under Section 6 of the Environment (Wales) Act 2016 by planning authorities seeking to maintain and enhance biodiversity in the exercising of their functions and promoting the resilience of ecosystems (see PPW paragraphs 6.4.5 and 6.4.6);
- Working collaboratively across authority boundaries (see PPW paragraph 6.4.9);
- Using the DECCA Framework (Diversity, Extent, Condition, Connectivity, and Adaptability) to comply with the Section 6 Duty (see PPW paragraph 6.4.10);
- Writing development plan policies for non-statutory designations (see PPW paragraph 6.4.33); and
- Securing nature-based water solutions for green infrastructure (see PPW paragraph 6.6.6).

The step-wise approach is a means of demonstrating the steps which have been taken towards securing NBB at a site-specific level within the planning process (see PPW paragraphs 6.4.11 to 6.4.17 and Figure 12). In doing so the resilience of ecosystems should also be taken into account by applying the DECCA framework.

In summary, developments must go beyond simply avoiding harm—they should provide real improvements for nature to deliver NBB, using the step wise approach and DECCA Framework in doing so. The NBB approach applies to all development proposals.

Chapter 6 recognises NNRAs as having development plan status and that they should be subject to the step-wise approach.

Area Statements

Area Statements arise from Section 11 of the Environment (Wales) Act 2016 and ensure that natural resources are considered in national, regional and local decision-making. They support the implementation of the [Natural Resources Policy](#) (Welsh Government, 2017) and embed the Sustainable Management of Natural Resources (SMNR) approach.

Regard to Area Statements must be given by public bodies in the exercising of their functions, in accordance with Part 1, Section 13 of the Environment (Wales) Act 2016. This regard to Area Statements is further emphasised in Future Wales and PPW.

The Gwent Levels fall within the catchment of two Area Statements, that of [South Central](#) and [South East](#).

RENs

Resilient Ecological Networks (RENs), are networks of habitats linking protected sites and other biodiversity hotspots across the wider landscape, providing maximum benefit for biodiversity and human well-being. Such networks have existing healthy resilient ecosystems or create the potential for them, which:

- provide a range of important ecosystem services, that is, benefits which people may receive from nature and healthy ecosystems such as food, cultural heritage, climate regulation and water purification, and
- also allow for the movement of species across landscapes in response to climate change and disruptive or adverse events.

The maintenance, enhancement and re-creation of RENs are vital for nature recovery.

The identification of RENs is a key means of delivering a number of NRW's Area Statement themes. RENs are identified by the Welsh Government as a priority in both the [Natural Resource Policy](#) (Welsh Government, 2017) and the [Welsh Nature Recovery Action Plan](#) (Wales Biodiversity Partnership, 2023). RENs provide a

strategic spatial approach to influence land management objectives and actions. Defining RENs provides an opportunity to prioritise and integrate existing and proposed activity, as well as secure and target new resources to maintain and build ecosystem resilience. As such, their application can be used in multiple ways, including for land-use planning.

As RENs are a product of Area Statements they **must** be given the same regard by public bodies as required by Part 1, Section 13 of the Environment (Wales) Act 2016.

REN mapping

Policy 9 and PPW require the production of REN mapping and its implementation by planning authorities in their development planning. REN maps are made up of Core Zones (including protected sites such as SSSIs) and Nature Recovery Zones (opportunity areas) connecting Core Zones and/or strengthening their resilience. These Core and Recovery Zones mapped together form an applied opportunity map to assist in working towards securing resilient ecological networks.

NRW South East and South Central Area Statement Teams have collaboratively developed REN mapping, in partnership with local and regional stakeholders, for the Gwent Levels. See Section 6.

The Guidance provides a narrative on how Gwent Levels REN mapping and the NNRA designation should be applied in planning decisions and in the preparation of both strategic and local development plans.

4. The Gwent Levels – a unique Welsh Landscape

The Gwent Levels represent a rare combination of archaeological richness, historic landscape character, and cultural continuity. Their preservation is essential to understanding the interaction between people and the natural environment over millennia.

The Gwent Levels are one of Wales' most distinctive landscapes, a reclaimed coastal plain along the north shore of the Severn Estuary in Southeast Wales. Stretching from Cardiff in the west to Chepstow in the east, the Levels reflect over two millennia of human effort to manage water and land. Reclamation was driven by the need for fertile pasture and arable land, reliable stock watering, and protection from tidal flooding. Today, the Levels remain a living example of human and environment interaction, combining ecological richness with cultural heritage and a strong sense of place.

The Gwent Levels comprise two principal areas that adjoin the Severn Estuary: the Wentloog Level between the Rivers Rhymney and Usk (to the west of Newport) and the Caldicot Level between the Rivers Usk and Wye (to the east of Newport). The Levels consist of low-lying alluvial ground protected by man-made sea walls and drained by an intricate network of field ditches and larger watercourses known locally as reens. Fields are also crossed by grips which are shallow drainage channels cut into fields to help manage surface water and prevent waterlogging. This engineered hydrological system of reens, ditches and grips underpin both agricultural productivity and the rich biodiversity of the Levels.

The Gwent Levels are recognised for both natural and historic value. Nationally, eight Sites of Special Scientific Interest (SSSIs) safeguard the wet pasture, aquatic plant assemblages and invertebrate communities associated with reens and field ditches. These SSSIs cover roughly 5,856ha (see Figure 4-2). Internationally, their coastal fringe forms part of the Severn Estuary network of protected sites, designated as a Special Protection Area (SPA), Special Area of Conservation (SAC) and Ramsar Site for migratory birds, estuarine habitats and migratory fish. The wider landscape is registered as a Landscape of Outstanding Historic Interest in Wales, reflecting the exceptional survival of reclaimed field patterns, water management structures and settlement forms.

The numerous statutory and non-statutory designations, such as SSSIs, each have their own citations and documentation. See Appendix 1 for a list of the various designations.

Key Features

Habitats and Biodiversity

The Levels are home to a wide range of plants and animals, including over 250 species of aquatic invertebrates, some of which are found nowhere else in Wales. Some of the key habitats and biodiversity features which are characteristic of the Levels are:

- **Various types of grassland:** which support breeding lapwing and redshank, along with the various life stages of the rare Shrill Carder Bee.
- **Reens, field ditches and grips:** These watercourses cover hundreds of miles. They support diverse aquatic plant communities, including hairlike pondweed and native duckweeds. Their adjoining banks offer nectar sources and nesting sites for pollinators. They help drain the land, provide irrigation for agriculture, and act as a valuable habitat and wildlife corridor, knitting the landscape together.
- **Intertidal Zone:** The retreating tide uncovers a vast area of salt marsh and mudflats. This dynamic environment is a haven for wildlife, including rare and endangered species, and an important carbon store.
- **Invertebrates:** The Levels provide strongholds for notable invertebrate assemblages, including the great silver water beetle and the Shrill Carder Bee, which is listed as a UK priority species. The Levels are one of the largest remaining strongholds in the UK for the Shrill Carder Bee.
- **Birds:** The Levels provide nesting and foraging habitats for a number of important wildfowl and waders during winter and migration and also during the breeding season, including wigeon, teal, pintail, shoveler, lapwing and black-tailed godwit.
- **Mammals:** Otters use the interconnected ditch network and the River Usk, while water voles exist where there are stretches of well-vegetated banks. Bats and dormice are other mammals found on the Levels.

Many of the habitats and species are subject to statutory protection under the Wildlife and Countryside Act 1981 (as amended) and the Conservation of Habitats and Species Regulations 2017. In addition, a substantial number are listed as Priority Species and Priority Habitats under Section 7 of the Environment (Wales) Act 2016, which places a duty on public authorities to maintain and enhance their conservation status.

Figure 4-1 and accompanying text shows the relationship between some of the Levels' typical habitats, species and ecosystem services.

Cultural and Archaeological Heritage

The Levels is one of the finest examples of a reclaimed landscape in Britain and is on the Register of Landscapes of Outstanding Historic Interest. The Levels preserve exceptional archaeological and palaeoenvironmental records. Peat and alluvial deposits have sealed prehistoric surfaces, preserving Mesolithic footprints at Uskmouth and yielding artefacts from Bronze and Iron Age activity. Roman engineering is evidenced by reclaimed field systems and finds such as a Romano-British boat recovered near Magor. During the medieval period, monastic houses such as Goldcliff Priory and Tintern Abbey reclaimed large areas of land, creating many of the sea banks, droveways and field patterns that remain visible today.

While traditional features such as pollarded willows, orchards and historic field patterns survive, modern development (including railways, steelworks, power stations, and major roads) has altered parts of the Levels.

The Severn Estuary has one of the highest tidal ranges in the world and is protected from the incoming tide by a 35km long sea wall that dates from the late medieval period. Without it, the Levels in their present form would not exist.

Community and Economic Importance

Historically one of Britain's largest grazing marshes, the Levels supported traditional farming and orchards. The Levels continue to play an important role in productive agriculture, especially in livestock grazing and food production.

The Levels are on the doorstep of almost one million people, a third of the population of Wales. It has a vital role to play in providing accessible green space for some of the largest cities in Wales, access to nature, and health and well-being benefits this can provide. Sites such as Newport Wetlands attract birdwatchers and families, bringing economic benefits through eco-tourism and volunteering. The landscape identity, that of big skies, low horizons and historic reens, contributes to its local distinctiveness and the well-being of its communities.

Natural and Green Infrastructure benefits

Figure 4-1 and accompanying text highlights the typical ecosystem services provided by the Gwent Levels.

Ecosystem services (or benefits) are often referred to as natural or green infrastructure benefits. Our health, economy, and well-being all rely on the essential benefits provided by ecosystem services. They are the natural processes that supply our food, clean our air and water, and stabilise the climate.

Ecosystem services are grouped into four main categories:

- provisioning (e.g. food, water), things we can eat or use.
- regulating (e.g. climate, flood control), things that keep the planet healthy.
- cultural (e.g. heritage, recreation), things that make life enjoyable.
- supporting services (e.g. habitat connectivity, biodiversity maintenance), things that make life possible.

These services are underpinned by the Gwent Levels' ecosystems, which include freshwater habitats, fen, bog, semi-natural grassland, native woodland, and coastal grazing marsh. These services collectively support biodiversity, flood alleviation, carbon storage, and food production, while also providing cultural and recreational benefits.

Local Authority and NRW Areas

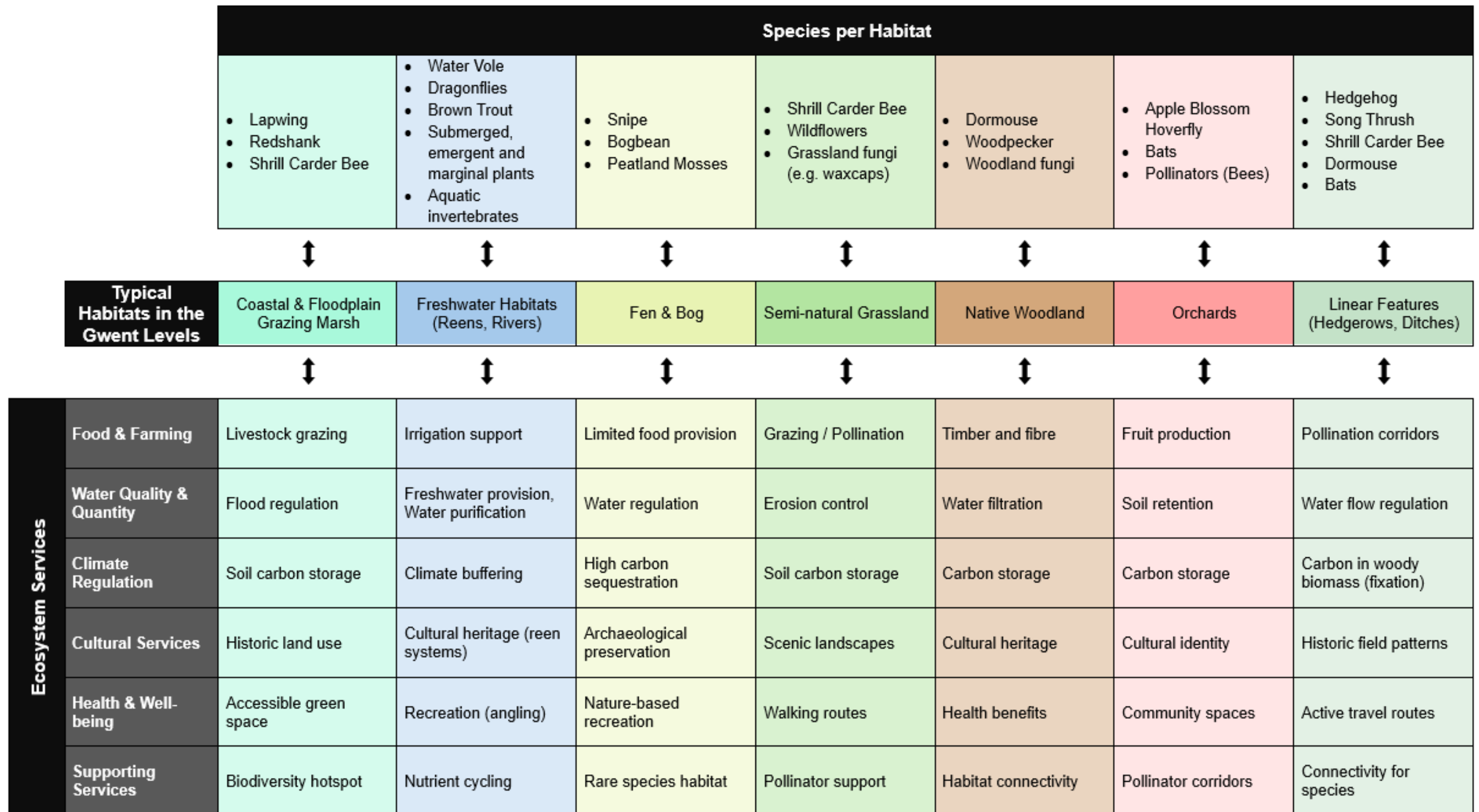
The Gwent Levels span parts of three local authority areas: Cardiff Council, Newport City Council and Monmouthshire County Council. Their respective websites and Local Development Plans provide details of additional local designations, such as Sites of Importance for Nature Conservation, conservation areas and others.

In terms of Natural Resources Wales' functions, the Gwent Levels fall within both the [South-Central](#) and [South-East](#) areas. The Area Statements for these regions provide further detail on the character and features of the Levels.

Further information

Further contextual information can be found in the [National Landscape Character Assessment](#) (NRW, 2014), the [Gwent Levels Landscape Profile](#) (NRW, 2019), and the Historic Landscape Characterisation (GGAT, 1997). Additional insights are also available via the [HENEb](#) website (The Gwent Levels – Historic Landscape Character Area 2025). The Gwent Levels also benefit from an active landscape partnership, the [Living Levels Partnership](#), and their website contains a wealth of information, resources and projects that showcase the heritage, biodiversity and community initiatives of the Gwent Levels. Many more sources which describe the characteristics of the Levels in detail are referenced in [Integrated Sustainability Appraisal: of the Strategic Planning Guidance for the Gwent Levels National Natural Resource Area \(Future Wales Policy 9\): Scoping Report](#) (Welsh Government, 2026).

Figure 4-1: Functional Linkages between Typical Habitat, Species, and Ecosystem Services in the Gwent Levels



For Coastal and Floodplain Grazing Marshland Habitats, typical species include:

- Lapwing
- Redshank
- Shrill Carder Be

Relevant ecosystem service types include:

- Food and farming category: Livestock grazing
- Water Quality and Quantity category: Flood Regulation
- Climate Regulation category: Soil carbon storage
- Cultural Services category: Historic land use
- Health & Well-being category: Accessible green space
- Supporting Services category: Biodiversity hotspot

For Freshwater Habitats (Reens, Rivers), typical species include:

- Water Vole
- Dragonflies
- Brown Trout
- Submerged, emergent and marginal plants
- Aquatic invertebrates

Relevant ecosystem service types include:

- Food and farming category: Irrigation support
- Water Quality and Quantity category: Freshwater provision, Water purification
- Climate Regulation category: Climate buffering
- Cultural Services category: Cultural heritage (reen systems)
- Health & Well-being category: Recreation (angling)
- Supporting Services category: Nutrient cycling

For Fen & Bog Habitats, typical species include:

- Snipe
- Bogbean
- Peatland Mosses

Relevant ecosystem service types include:

- Food and farming category: Limited food provision
- Water Quality and Quantity category: Water regulation
- Climate Regulation category: High carbon sequestration
- Cultural Services category: Archaeological preservation
- Health & Well-being category: Nature-based recreation
- Supporting Services category: Rare species habitat

For Semi-natural Grassland Habitats, typical species include:

- Shrill Carder Bee
- Wildflowers
- Grassland fungi (e.g. waxcaps)

Relevant ecosystem service types include:

- Food and farming category: Grazing / Pollination
- Water Quality and Quantity category: Erosion Control
- Climate Regulation category: Soil carbon storage
- Cultural Services category: Scenic landscapes

- Health & Well-being category: Walking routes
- Supporting Services category: Pollinator support

For Native Woodland Habitats, typical species include:

- Dormouse
- Woodpecker
- Woodland fungi

Relevant ecosystem service types include:

- Food and farming category: Timber and fibre
- Water Quality and Quantity category: Water filtration
- Climate Regulation category: Carbon storage
- Cultural Services category: Cultural Heritage
- Health & Well-being category: Health benefits
- Supporting Services category: Habitat connectivity

For Orchids Habitats, typical species include:

- Apple Blossom Hoverfly
- Bats
- Pollinators (Bees)

Relevant ecosystem service types include:

- Food and farming category: Fruit production
- Water Quality and Quantity category: Soil retention
- Climate Regulation category: Carbon storage
- Cultural Services category: Cultural identity
- Health & Well-being category: Community spaces
- Supporting Services category: Pollinator corridors

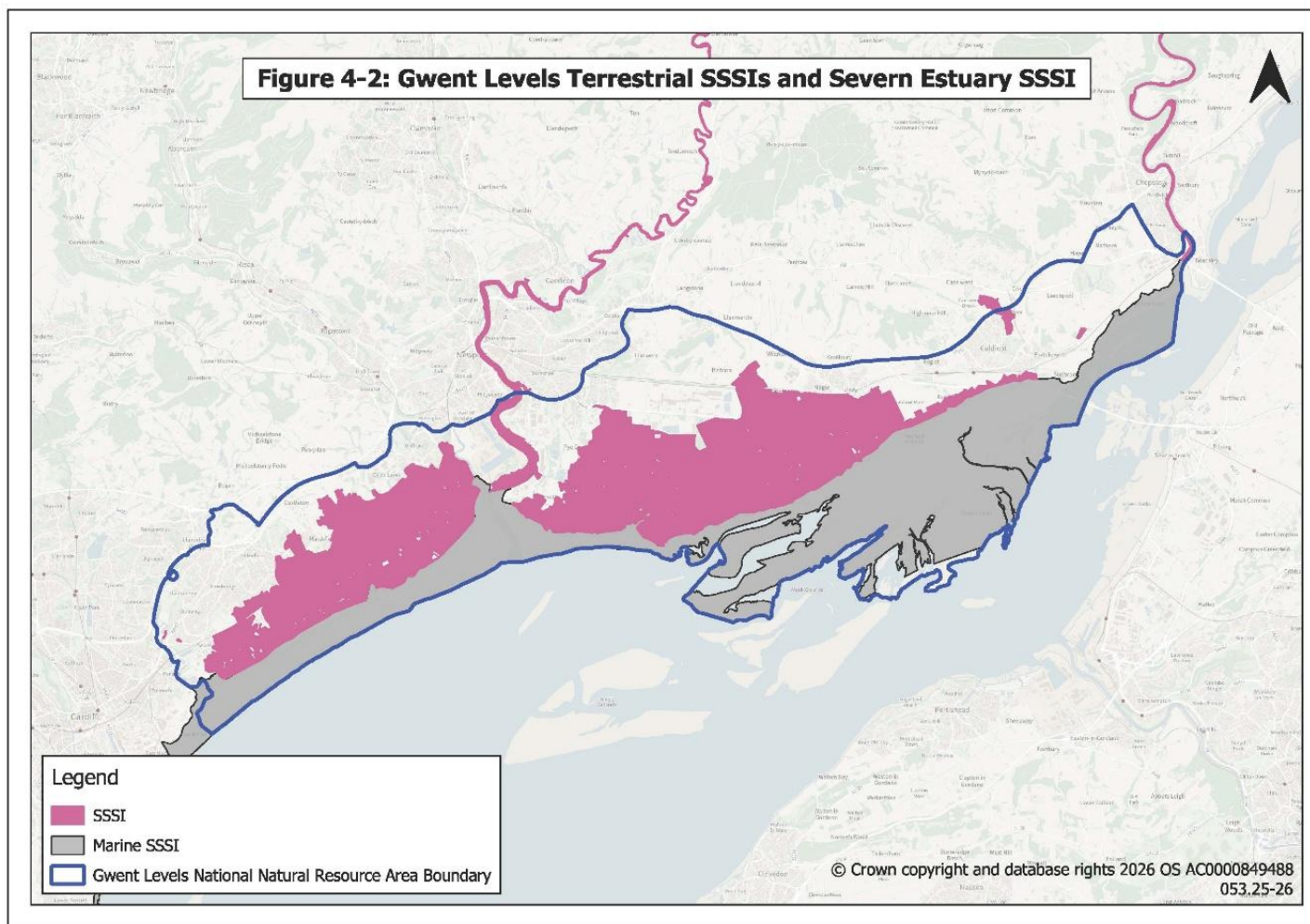
For Linear Features (Hedgerows, Ditches) Habitats, typical species include:

- Hedgehog
- Song Thrush
- Shrill Carder Bee
- Dormouse
- Bats

Relevant ecosystem service types include:

- Food and farming category: Pollination corridors
- Water Quality and Quantity category: Water flow regulation
- Climate Regulation category: Carbon in woody biomass (fixation)
- Cultural Services category: Historic field patterns
- Health & Well-being category: Active travel routes
- Supporting Services category: Connectivity for species

Figure 4-2 Gwent Levels Terrestrial SSSI and Severn Estuary SSSI



(Data Map Wales , 2026) Contains Natural Resources Wales information © Natural Resources Wales and Database Right. All rights reserved.

5. Current Challenges Affecting the Gwent Levels

The Gwent Levels remain a distinctive, human-shaped landscape that supports a rich diversity of species, some found nowhere else in Wales. While it continues to serve as an important agricultural area, primarily for grazing livestock, the Levels face mounting threats from urban expansion, development pressures, pollution, localised mismanagement, and climate change. The following Section outlines some of the key pressures currently affecting this unique landscape. These have been identified through scoping work for the [Integrated Sustainability Appraisal Integrated Sustainability Appraisal: Scoping Report](#) (Welsh Government, 2026), the production of [NRW REN mapping](#), the [Gwent Levels Post Construction Monitoring](#) (Arup, 2024) and various stakeholder discussions.

Fragmentation:

Section 7 habitat, as well as statutory, non-statutory designations and protected sites on the Gwent Levels, are at risk from further fragmentation. This fragmentation results from climate change impacts (including that of increased flooding and drier summers) and that of cumulative development (including infrastructure projects). The cumulative effects of these factors contribute to continued habitat fragmentation across the Levels.

Fragmentation also poses a risk to the wider ecosystem resilience of the Gwent Levels. This is because when habitats are broken up, wildlife can't move around as easily, natural processes like water flow and pollination are disrupted, and biodiversity declines. This puts important benefits at risk—such as flood protection, clean water, carbon storage, and the cultural value of the Gwent Levels—making the area less able to cope with climate change and other pressures.

Functionally linked habitats:

Section 7 habitat, as well as statutory, non-statutory designations and protected sites both on the Gwent Levels and within the adjoining Severn Estuary MPA are also at risk with regards to the favourable condition of their features and characteristics. This is particularly the case because qualifying features and functionally linked habitats (including habitats required for features to complete full life cycles) are not always given adequate consideration in land-use management decisions.

Due to the interconnectivity of the reed and field ditch network and their associated grasslands, any impacts on the condition and functionality of the Gwent Levels SSSI hydrology, such as changes in water quality or quantity can also negatively affect the adjoining Severn Estuary MPA. This is particularly the case in terms of reducing the

availability of adequate land for mobile species to move around within the Gwent Levels.

Species:

With habitats at risk, the unique range of species the Levels support also becomes highly vulnerable to significant loss. The [NRW Species in Peril](#) report identifies the Gwent Levels as a nationally significant wetland landscape supporting a high concentration of threatened species, reliant on its unique network of ditches and traditional management for survival. The report notes that some species occur only within the Gwent Levels' ditch systems, such as the rare aquatic plant Hairlike Pondweed (*Potamogeton trichoides*), and the Shrill Carder Bee, making the area irreplaceable for their survival in Wales.

Water quality, quantity and the integrity of the water network:

The Gwent Levels and its adjoining intertidal zone are highly susceptible to flooding. These areas face increasing risk due to rising sea levels driven by climate change, fluvial flooding, and any shortcomings in the management of their natural drainage systems.

Water storage capacity in the Gwent Levels is affected by two key factors. During tidal lock, when high tides restrict drainage into the sea, excess water cannot be released efficiently, increasing flood risk. Conversely, during extended dry periods, limited water availability places additional stress on habitats, species and agriculture.

Water quality and the condition of the reens and ditch network are persistent issues on the Gwent Levels. The interconnected waterways are highly sensitive to pollution, nutrient enrichment, sedimentation and changes in surrounding land management, all of which can degrade the ecological health of the system. Problems such as diffuse and point source pollution, contamination from surrounding development, and declining habitat quality within the ditches continue to threaten the diversity and vitality of aquatic plants and invertebrates. As a result, poor water quality and deteriorating ditch condition pose a significant challenge to maintaining the ecological integrity and resilience of the Gwent Levels.

Landscape character:

The reens, drainage ditches and grips that shape the Gwent Levels are integral to its distinctive landscape character and its significant archaeological interest. These defining landscape features are increasingly vulnerable to a range of pressures, including insufficient management and maintenance, modifications to drainage systems, the impacts of climate change and extreme weather, development activity and shifts in land use practices.

New development and infrastructure schemes on the Gwent Levels are also significantly impacting the area's historic landscape and its visual and sensory qualities, particularly the area's strong sense of tranquillity and remoteness. Light pollution is recognised in Gwent as a major pressure on ecosystems and species function, health and resilience.

Food production:

The Levels have historically supported productive grazing marsh and orchards, but traditional systems have been declining. The fragmentation of farmland across the Gwent Levels, combined with the impacts of climate change, is likely to be placing increasing pressure on the food system. This loss of agricultural land reduces the ability of the Levels to meet food supplies sustainably locally and nationally.

Carbon storage:

Carbon storage is an important function of the Gwent Levels, with its wetlands, grasslands and peat soils helping to lock in carbon and support climate resilience. The level and quality of carbon stores on the Gwent Levels (particularly that of wetlands and peat) are at risk from changes in drainage practices, development pressures and land-use change. For example, lowering water tables through increased drainage can oxidise peat, releasing stored carbon as CO₂.

Air Quality:

Traffic congestion and greenhouse gas emissions are high in the adjoining urban areas of Cardiff and Newport. This in turn will be impacting the Gwent Levels landscape, particularly in relation to its air quality. Higher emissions exacerbate climate change, which in turn influences hydrology and habitat resilience in the Levels.

Amenity:

The availability of opportunities to access amenity areas and open spaces varies across the Gwent Levels and its surroundings. There are concerns regarding barriers to access, including safety concerns and a general need to improve accessibility for local communities. This shortfall in amenity can impact on people's health and general well-being.

Littering and fly-tipping:

There are localised hotspots where fly-tipping is a problem on the Levels. Littering is also an issue across the Levels and is a major problem for the Severn Estuary MPA. These issues pose significant challenges to the environment and local communities.

Other Challenges: Operational and delivery issues:

In addition to the Gwent Levels specific issues mentioned above, there are a number of wider planning-system issues that appear to be affecting the area and impacting the delivery of Policy 9. These include:

- There being a general absence of coordinated **landscape-scale** thinking in land-use management and development proposals. Many submissions consider sites in isolation rather than giving consideration to addressing nature recovery and ecosystem resilience across the wider Gwent Levels landscape.
- **In-combination** and cumulative effects on the Gwent Levels and their SSSIs are frequently under-assessed as part of land-use proposals. This leads to an incomplete understanding of the wider ecological impacts of such proposals.
- **Condition assessments** required to inform planning submissions affecting SSSIs are often missing, incomplete, or inadequate, limiting the ability to evaluate potential impacts on designated features.
- **Planning conditions** are frequently poorly worded, inconsistently applied, or unclear about the requirements for their discharge. This results in uncertainty during implementation and compliance.
- Requirements relating to net benefit for biodiversity, along with key mitigation details, are often deferred to **pre-commencement conditions**. This limits scrutiny at the application stage and makes effective delivery more difficult to secure.
- **Mitigation and compensation** measures are often unsupported by robust evidence, leading to ineffective implementation and uncertainty over whether intended outcomes can be achieved. This also creates ambiguity around enforceability.
- **Management plans and subsequent monitoring** reports frequently lack clear targets, timeframes, and adaptive management mechanisms, making it difficult to track progress or take corrective action when outcomes are not met.

In summary:

As a unique and highly valued landscape, the Gwent Levels should be safeguarded and enhanced through strategic action to address the challenges and threats outlined above. Its designation as a NNRA provides the basis through which

coordinated measures, as set out in The Guidance, are required to reduce these pressures and ensure the Levels continue to function as a strategic landscape that supports biodiversity, preserves heritage, sustains farming, underpins the local economy, and strengthens community resilience.

6. The Gwent Levels NNRA – A Spatial Designation

Policy 9 has designated the Gwent Levels as an NNRA due to their exceptional ecological and natural resource value. This designation aims to ensure that actions are planned and delivered at a strategic level to enhance biodiversity, strengthen ecosystem resilience, and improve green infrastructure.

In line with Policy 9 requirements, NRW has completed REN mapping for the Gwent Levels NNRA as part of their Area Statement remit. The Welsh Government has adopted NRW's REN mapping as the spatial dataset for interpreting and implementing Policy 9 for the Gwent Levels.

Within the NNRA are two spatial zones in which specific actions should be taken. These are the Core Zone and the Recovery (Opportunity) Zone. The text boxes below explain the definition and background development of each spatial Zone.

The Gwent Levels NNRA Spatial Area	
The NNRA spatial area designated by The Guidance is defined by the interactive Gwent Levels NNRA map. This map is the definitive reference for all planning policy and development management decisions in relation to the NNRA. Figure 6-1 illustrates the indicative spatial area of the NNRA and is provided for reference only.	
NRW's Initial Area of Search used in the Gwent Levels REN mapping work is formally adopted to be used as the definitive NNRA. The NNRA spatial boundary provides a framework for practical application of The Guidance.	
Justification	
NRW's Initial Area of Search boundary involved assessment through their REN process and provides the best available spatial indication for defining the NNRA and applying the Strategic Principles and Actions set out by The Guidance. The Gwent Levels REN network is large enough to include core habitats and provide opportunities for connectivity and wider resilience.	
It is recognised that ecological processes, species, and habitats do not adhere to mapped lines and opportunities will also exist beyond the NNRA boundary.	
Background/further information	
NRW identified the Initial Area of Search by focusing on the reclaimed estuarine alluvium between the Rivers Rhymney and Wye, which forms the Gwent Levels coastal plain. To define precise boundaries, NRW used multiple GIS layers and tested those through stakeholder engagement. GIS layers used by NRW included	

the Living Levels Partnership boundary, the Gwent Levels Landscape Profile, major designated sites (such as SACs and SSSIs), and the reed and river network.

For the Severn Estuary, NRW's Initial Area of Search followed the Mean Low Water line. NRW's approach takes into account species and ecological connectivity (e.g., wading birds) between the Estuary and the Levels, reflects the terrestrial management requirements of saltmarsh habitats, aligns with the land-use planning system, and recognises the requirement for Area Statements to cover land down to Mean Low Water. Further detail as to how NRW identified that Initial Area of Search is set out in their evidence report, [Gwent Levels. Mapping Resilient Ecological Network core zones and nature recovery zones](#).

The Gwent Levels Core Zone

The Core Zone area designated by The Guidance is defined by the interactive [Gwent Levels NRW REN map](#). This map is the definitive reference for this Zone in all planning policy and development management decisions. Figure 6-2 illustrates the indicative extent of the Core Zone and is provided for reference only.

Justification

Core Zones are nature-rich areas that act as reservoirs of biodiversity, providing the source from which species can spread into the wider landscape when conditions allow. They consist of existing high quality semi-natural habitats, including statutory and non-statutory sites, for example SSSIs and Section 7 Habitats.

There are a small number of unshaded areas within the Core Zone. These occur because those parcels of land do not themselves carry statutory designations, despite being entirely surrounded by protected sites. PPW recognises that development can give rise to indirect effects on designated sites — including impacts arising at some distance (Paragraphs 6.4.24 and 6.4.28). For the purposes of Policy 9 to ensure ecosystem resilience, these areas are afforded the same level of protection as the surrounding designated sites in The Guidance.

Background/further information

The Gwent Levels Core Zone as defined by NRW currently comprises 42 adjoining polygons (datasets), covering a total area of 18,979 hectares (ha). Each polygon has a locally recognised name and has been classified according to one or more broad ecosystem types. Those ecosystem types follow the definitions used in [Natural Resources Wales / State of Natural Resources Report \(SoNaRR\) for Wales 2020](#); coastal margins, enclosed farmland, freshwater, marine, native woodland, and semi-natural grassland.

The Gwent Levels Recovery (Opportunity) Zone
<p>The Recovery (Opportunity) Zone areas designated by The Guidance are defined by the interactive Gwent Levels NRW REN map. This map is the definitive reference for this Zone in all planning policy and development management decisions. Figure 6-2 illustrates the indicative extent of the Recovery (Opportunity) Zone and is provided for reference only.</p>
Justification
<p>In an ecological network, nature Recovery (Opportunity) Zones strengthen Core Zones by identifying opportunities to restore, create, and positively manage adjoining land and water. These actions help Core Zones function better, increase their ecological resilience, and help protect them from external pressures. Recovery does not imply that an area is degraded or in need of repair. Rather, it highlights places where improvements can enhance resilience and deliver wider landscape-scale benefits.</p> <p>Nature Recovery (Opportunity) Zones can consist of several key components:</p> <ul style="list-style-type: none"> • Buffers adjacent to Core Zones, which are a functional component of species movement • Corridors between Core Zones • Stepping-stones between Core Zones • Linear landscape features such as hedges, native tree lines, ditches and the vegetated margins of fields, watercourses, hedgerows, roads and active travel routes • Habitat patches between Core Zones: <ul style="list-style-type: none"> ○ supporting degraded habitats with potential for restoration ○ Habitat in process of restoration from a degraded to a functional state.
Background/further information
<p>The Gwent Levels Recovery (Opportunity) Zone as defined by NRW currently comprises 82 polygons (datasets), covering a total area of 2,214 ha. Each polygon has a locally recognised name and has been classified according to one or more broad ecosystem types. The ecosystem types follow the definitions used in Natural Resources Wales / State of Natural Resources Report (SoNaRR) for Wales 2020; coastal margins, enclosed farmland, freshwater, marine, native woodland, and semi-natural grassland. Each polygon also sets out the intended opportunity component – buffer, stepping stone etc.</p>

The mapping undertaken by NRW is based on the [Natural Resources Wales / Practitioners' guide to Resilient Ecological Networks](#) and collaborative workshops. NRW has produced an evidence report titled [‘Gwent Levels. Mapping Resilient](#)

[Ecological Network core zones and nature recovery zones](#)’ outlining the methodology used for the Gwent Levels mapping.

Keeping REN mapping under review

As the NRW REN mapping for the Gwent Levels is subject to periodic review, the interactive version on DataMapWales provides the definitive source REN mapping for planning policy and decision-making purposes.

Local Authorities should work collaboratively with NRW and other relevant partners to develop and maintain up-to-date REN mapping for NNRA areas. The basis for this work should be the [NRW Practitioners’ Guide to RENs: Terrestrial and Freshwater Resilient Ecological Networks \(Garrett & Ayling, 2021\)](#) or any future successor guidance. Additional ecological or network mapping resources can also be incorporated to strengthen the process and ensure comprehensive coverage.

Action Planning and Prioritisation

REN mapping provides the starting point for nature recovery planning across the Gwent Levels, but it must be built upon through a coordinated regional approach.

Site-based or detailed strategic habitat restoration plans are now being developed by various stakeholders including Local Nature Partnerships and the Living Levels Partnership. Land-use proposals should make effective use of these emerging and developed plans.

However, the cross-boundary nature of the area means that shared priorities and actions should also be agreed and delivered collaboratively at a regional scale. The Corporate Joint Committee provides one vehicle for enabling this coordination, but other regional mechanisms or partnerships may also potentially fulfil this role. The essential requirement is effective regional working to ensure that mapped opportunities for the Gwent Levels are translated into practical, jointly delivered interventions such as habitat creation, restoration, and long-term management.

Action Planning

The local authorities of [Cardiff](#), [Newport](#), and [Monmouthshire](#) produce **Green Infrastructure Plans or Strategies** to guide the protection, enhancement, and long-term management of multifunctional green networks. These documents typically identify strategic and site-specific opportunities for actions such as habitat creation, improved ecological connectivity, sustainable drainage solutions, woodland and wetland enhancement, and measures that support climate resilience, recreation, and community well-being.

Local Nature Partnerships (LNPs) continue to play a central role in translating strategic ambition into practical delivery. They are in the process of developing Local Nature Recovery Action Plans focused on habitat creation, restoration, community engagement, and improved ecological connectivity. LNPs will ensure that locally identified priorities align with regional objectives.

The **Living Levels Partnership** provides a landscape-scale approach to restoring and enhancing the Gwent Levels. Drawing on LNP strategies and REN evidence, the partnership is developing a comprehensive nature recovery plan for the Levels. This includes producing action plans for key species and habitats.

The **Gwent Wildlife Trust (GWT)** actively restore habitats, improving ecological connectivity, undertake active conservation across its reserves and surrounding landscapes. Their work at key sites such as Magor Marsh supports wider landscape-scale ecological resilience.

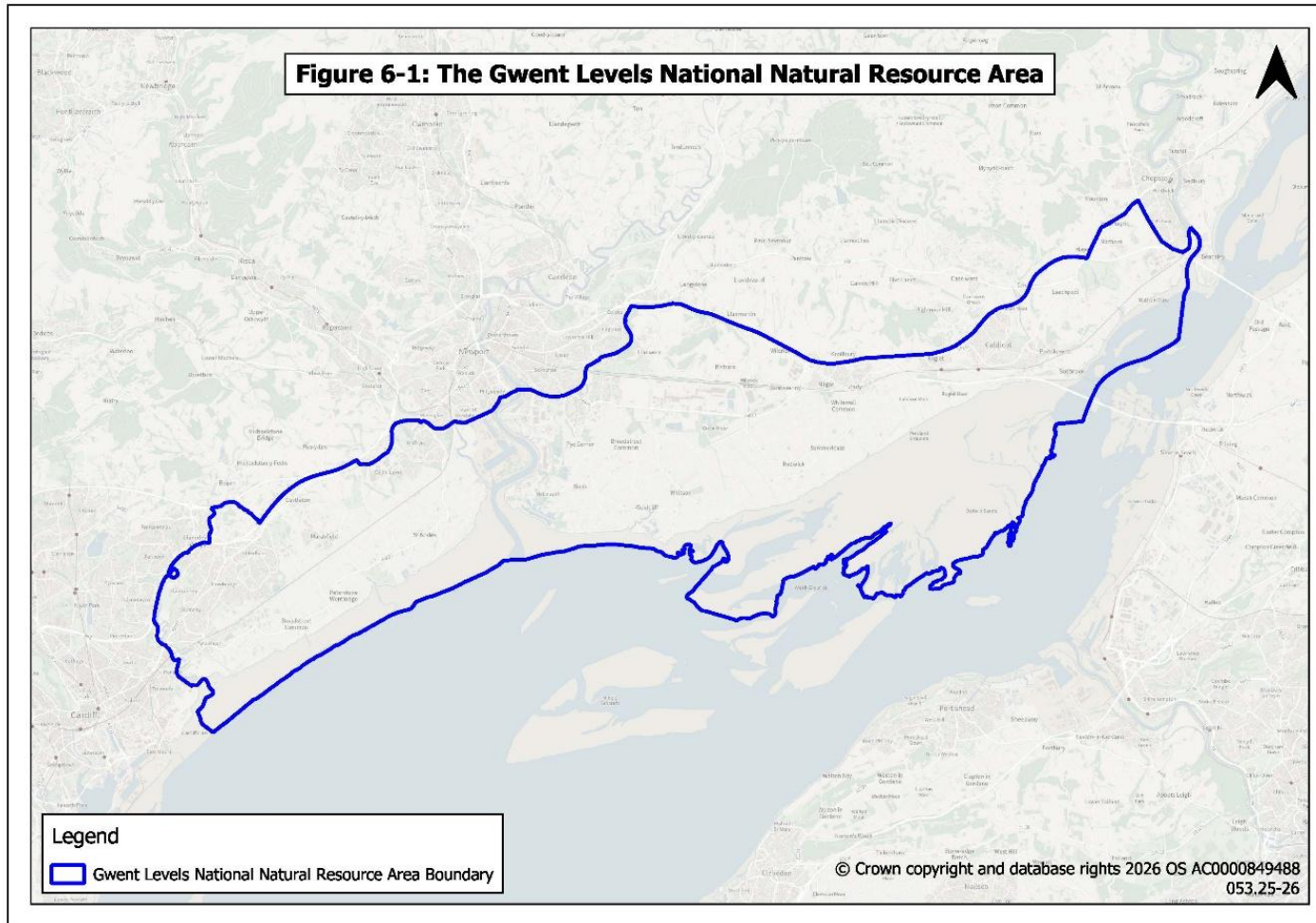
The **Gwent Green Grid Partnership (GGGP)** supports biodiversity engagement projects and provides interactive resources that help local authorities, practitioners, and communities prioritise areas for ecological intervention.

Natural Resources Wales (NRW) underpins ecological planning across the Gwent Levels by supplying technical evidence. NRW has a key role in terms of cross-agency cooperation in delivering nature recovery.

The **Greater Gwent Nature Recovery Action Plan (GGNRAP)** sets out high-level, regional priorities for nature recovery across all five Gwent local authority areas, providing strategic direction rather than detailed, landscape-specific actions. It therefore does not address the Gwent Levels at a fine-grain level, but it will help inform Local Nature Recovery Action Plans.

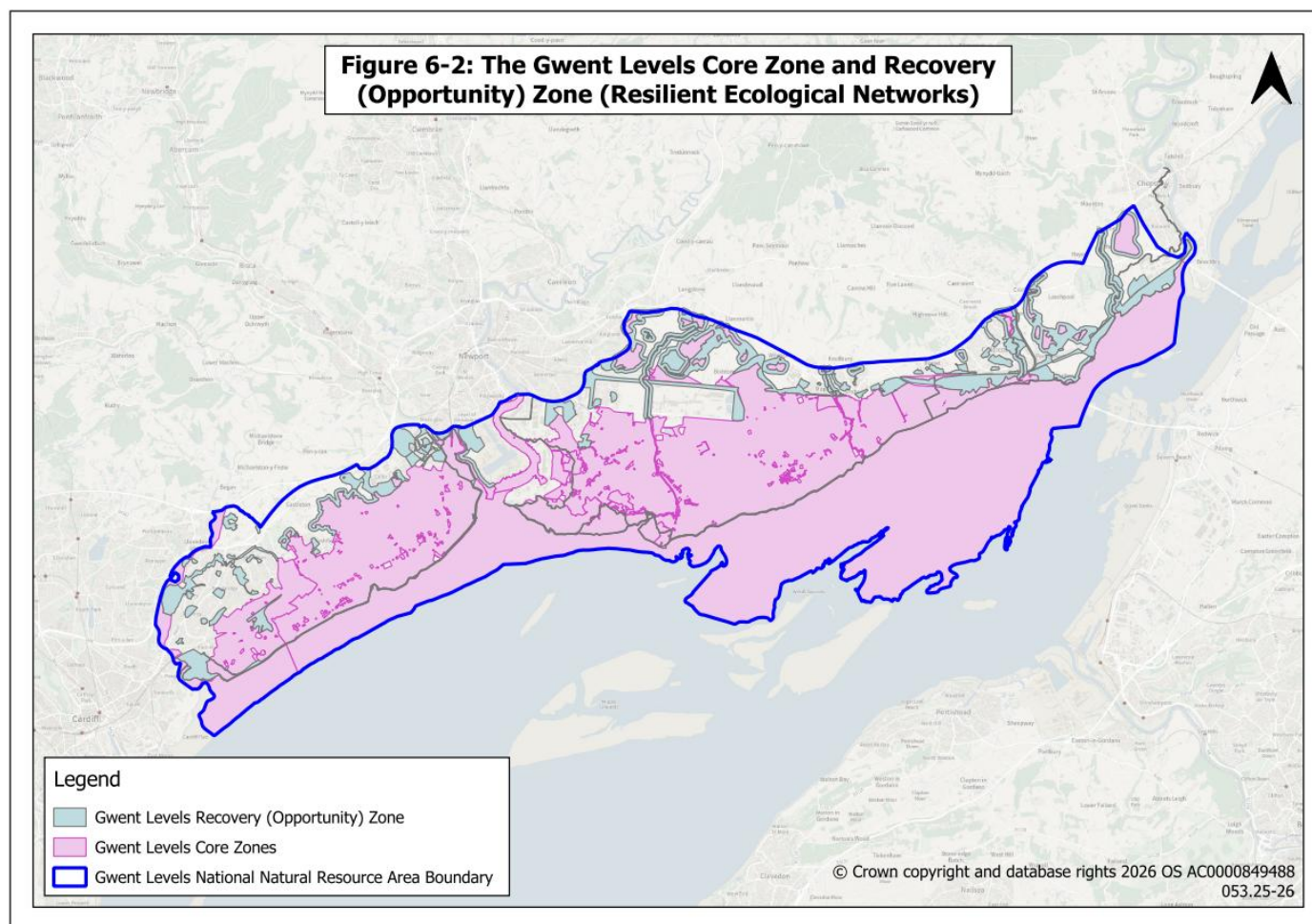
Additional sources of action planning will develop over time. In advancing development proposals, applicants are expected to collaborate with local planning authorities, NRW and third sector organisations to examine these sources and identify the priorities to which they can contribute.

Figure 6-1 The Gwent Levels National Natural Resource Area



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Figure 6-2 The Gwent Levels Core Zone and Recovery (Opportunity) Zone (Resilient Ecological Networks)



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7. Gwent Levels Strategic Principles and Actions

This Section sets out three overarching Strategic Principles – one for each of the Gwent Levels spatial areas: the National Natural Resource Area (NNRA), the Core Zone, and the Recovery (Opportunity) Zone.

The Strategic Principles reflect and build on the general requirements set out under Policy 9 Future Wales setting the context for each geographical zone within the designated area. They also work in a complementary way with wider policies contained in Planning Policy Wales (PPW), particularly those for Net Benefit for Biodiversity (NBB), as set out in Section 3.

The spatial focus for each area is as follows:

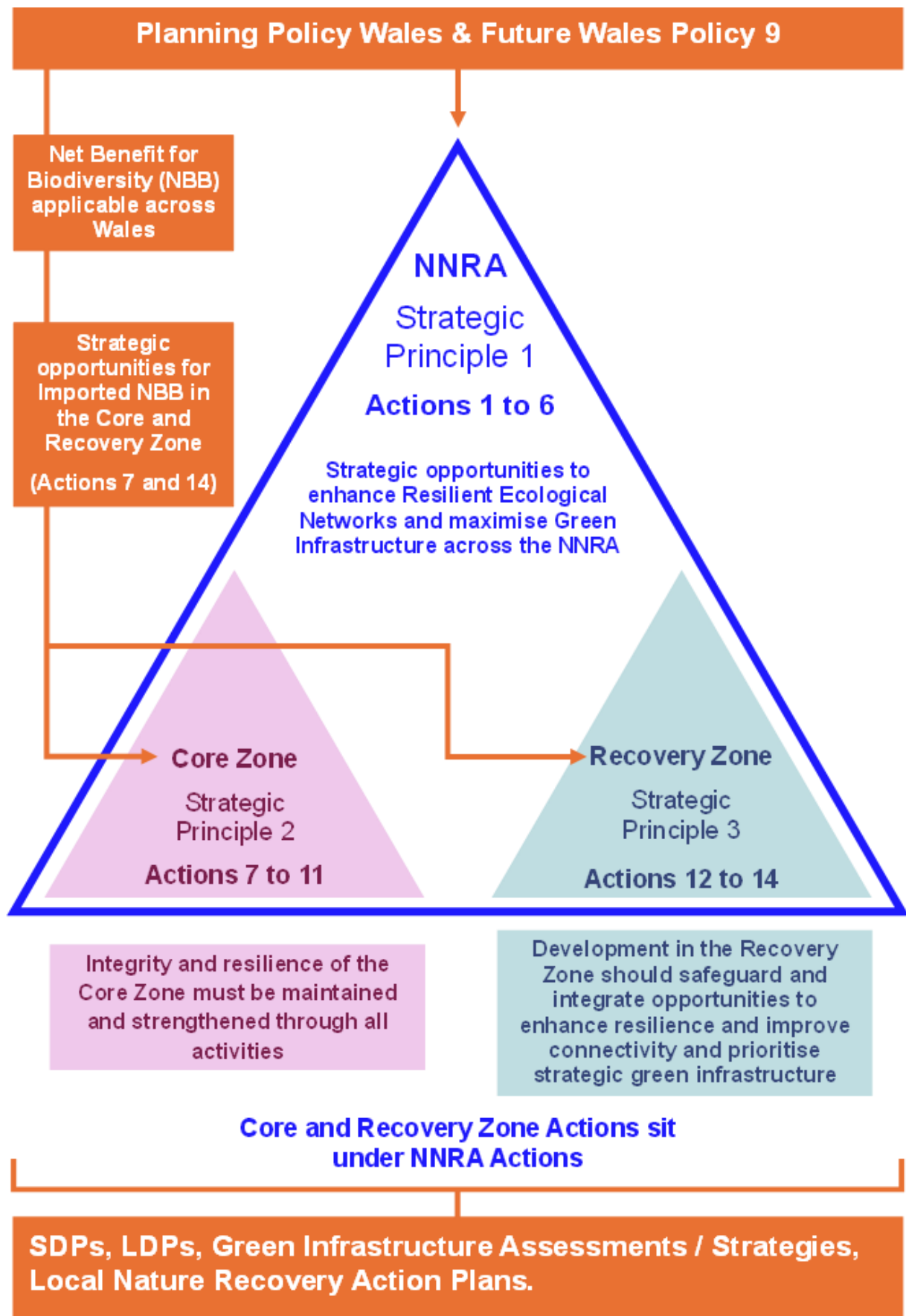
- The NNRA safeguards the wider landscape by protecting opportunities to strengthen ecosystem resilience and green infrastructure, providing a PPW aligned context for directing NBB to support the Gwent Levels as a whole.
- The Core Zone protects and restores the most sensitive areas of the Gwent Levels by acting as a focus for enhancement and recovery, supported by NBB, using DECCA, from development outside its boundary.
- The Recovery Zone is the main area for delivering NBB and strategic green infrastructure from development within the zone and from outside, that enhances wider connectivity and ecosystem resilience, using DECCA to support the long-term functioning of the Core.

Each Strategic Principle is accompanied by a number of specific Actions aimed at aiding the delivery of them as illustrated in Figure 7-1. The Actions are borne from issues that have been identified during preparation of The Guidance, as set out in Section 5.

The NNRA Strategic Principle and its associated Actions apply across the whole Gwent Levels area, covering both the Core Zone and the Recovery (Opportunity) Zone. In contrast, Actions that are specific to either the Core Zone or the Recovery (Opportunity) Zone apply only within that respective Zone.

Figure 7-1 shows how Future Wales, PPW and The Guidance connect, and how the Strategic Principles and Actions apply spatially. It highlights that The Guidance sits within the wider planning framework for biodiversity recovery, and that PPW Chapter 6 requires NBB for all development. Defining Core and Recovery (Opportunity) Zones helps target investment and interventions to deliver strategic long-term environmental benefits.

Figure7-1: The Gwent Levels Planning Framework



The Gwent Levels National Natural Resource Area

Strategic Principle 1: The Gwent Levels National Natural Resource Area (NNRA)

The Gwent Levels NNRA is a defined spatial area where opportunities to safeguard and strengthen biodiversity networks, ecosystem resilience, and green infrastructure should be maximised. Such safeguarding and strengthening of opportunities should assist the landscape to adapt to climate change and enhance the benefits of ecosystem services that contribute to wellbeing across its landscape.

The NNRA spatial area designated by The Guidance is defined by the interactive Gwent Levels [NNRA map](#). This map is the definitive reference for all planning policy and development management decisions in relation to the NNRA.

The aim of this Strategic Principle is to safeguard and strengthen biodiversity network, ecosystem resilience and to maximise green infrastructure, facilitating the delivery of Future Wales Policy 9 on the Gwent Levels.

The NNRA establishes the broad spatial context within which the wider Levels must be safeguarded and enhanced. It defines the functional landscape that underpins the area's distinctive ecological networks, hydrological systems and cultural heritage, ensuring these assets are not undermined by incremental or cumulative change. Its purpose is to protect opportunities for nature-based solutions (including green infrastructure), ecosystem resilience and future recovery, consistent with the requirements of PPW and Future Wales.

Within the NNRA, development should avoid undermining the environmental functions that support ecosystem resilience, habitat connectivity and green infrastructure. The priority is to maintain the landscape processes that enable the Levels to adapt to climate change and continue providing essential ecosystem services (benefits), including water regulation, carbon storage, biodiversity support and cultural wellbeing. Protecting these functions creates the conditions for more targeted recovery measures within the Core Zone.

In both plan-making and planning decisions, proposed land-uses and policies (strategic and local) must demonstrate how they safeguard the area's key ecological functions and how they retain or enhance the potential for future green infrastructure, including where such infrastructure functions as a specific nature-based solution. In this context, **safeguarding** means ensuring that development does not adversely affect the ecological, hydrological or landscape functions that give the NNRA its

strategic value. This is not a restriction on development, rather, it requires development proposals and development plans to secure design and policy outcomes that protect those functions and support the NNRA's long-term resilience.

Green infrastructure (GI) is a key nature-based intervention which can safeguard ecosystem resilience in the NNRA at a landscape scale. Local authorities should continue to work collaboratively in their identification of green infrastructure opportunities across the Gwent Levels. This should be at both the strategic landscape scale and individually on a site-by-site basis, delivering a multitude of and the maximum benefits towards resilience across the NNRA. Preparation of GI Assessments and Strategies and up-to-date mapping across boundaries should inform planning decision making on GI to ensure its provision within the Gwent Levels is maximised.

Section 4 gives an overview of the Gwent Levels characteristics and functions. Section 5 sets out the current identified issues affecting the Gwent Levels. These characteristics, functions and issues should be considered and evidenced in any GI Assessment and Strategies.

The NNRA also provides a basis for directing NBB to locations where they will have the greatest effect at the landscape scale. See Action 1.

Additionally, see Strategic Principle 2 in relation to the Core Zone and Strategic Principle 3 in relation to the Recovery (Opportunity) Zone.

ACTION 1: Net Benefit for Biodiversity within the NNRA

All proposed land-uses within the NNRA must deliver a Net Benefit for Biodiversity (NBB) and provide robust evidence demonstrating how this has been achieved. This should be in accordance with national planning policy requirements and fully comply with the step-wise approach set out in PPW.

Future Wales and PPW requires all development to deliver an NBB, and for biodiversity and ecosystem resilience to be embedded from the outset of any proposed land-use. All proposals must demonstrate that they have followed the step-wise approach in PPW Figure 12: first avoiding harm, then minimising it, and then mitigating any remaining impacts and as a last resort providing compensatory measures, noting that enhancement is a necessary consideration at every step to secure a measurable NBB outcome, with clear priority for on-site delivery to strengthen local ecological networks.

Compensation is only permissible once every reasonable on-site option to achieve NBB through avoiding, minimising and mitigating harm and securing enhancement

has been exhausted. **It is not an alternative to demonstrating compliance with the step-wise approach and must never justify avoidable loss.** Proposed land-uses must evidence this process through a Green Infrastructure Statement.

Development within the NNRA, and especially within the Core Zone, should achieve NBB entirely on-site in line with PPW due to the sensitivity and importance of these ecological networks.

Delivering NBB within the NNRA must be guided by robust ecological evidence and clear spatial priorities. GI is central to delivering NBB. Across the Levels, local authorities should continue to work collaboratively to reflect a cross-boundary consensus on GI Assessment for the NNRA, mapping opportunities and constraints at both site and landscape scales. To ensure consistency and maximise ecological benefit local authorities should collaborate — at a regional or Corporate Joint Committee level — to develop a shared set of strategic priorities for NBB delivery across the Gwent Levels NNRA. This collaborative approach will assist in providing a coherent framework for directing proposed land-use contributions towards the most beneficial actions enabling the channeling of resources to support a rolling programme of enhancement, monitoring and long-term management.

It is recognised that significant work is already on-going across the Gwent Levels allowing a shared set of priorities to be put in place. Until this is in place, developers should work with the relevant local planning authorities (LPAs) and recognised partners to identify suitable actions based on existing evidence and recovery plans.

To ensure that enhancement activities contribute meaningfully to resilient ecological networks, developers should draw on the full range of available spatial evidence, including the Regional Ecological Network (REN) mapping, Local Authority GI Strategies and Plans, Local Nature Recovery Action Plans, and the Living Levels work including its emerging Nature Recovery Action Plan (see Section 6). These sources provide an essential evidence base to help identify the most appropriate locations and types of interventions, particularly where off-site NBB is required and justified in accordance with PPW.

ACTION 2: Resilient Ecosystems within the NNRA

All proposed land-uses within the NNRA must demonstrate how they contribute to maintaining and enhancing the resilience of ecosystems and their benefits (ecosystem services). Proposals should provide clear evidence of how this has been achieved by addressing all attributes and emerging properties associated with the DECCA framework.

Maintaining and enhancing the resilience of ecosystems and the benefits they provide (ecosystem services) is a core requirement for all proposed land-uses within the NNRA. Proposals must clearly demonstrate how the design, layout, construction and ongoing management strengthen the capacity of ecosystems to withstand disturbance, adapt to change and continue delivering key services such as water regulation, biodiversity support, carbon storage, flood attenuation, soil formation, landscape character and recreation.

Figure 4-1 in Section 4 sets out typical ecosystems and associated services (benefits) in the Gwent Levels.

The DECCA framework provides the structure for assessing these outcomes. Proposed land-uses must therefore provide transparent evidence showing how all five DECCA attributes (and their emergent properties) have been addressed:

- **Diversity:** Demonstrate how the proposal protects or enhances the variety of species, habitats and structural features, ensuring that the range of habitat niches characteristic of the Gwent Levels is maintained.
- **Extent:** Provide a clear account of the various ecosystem services before and after development. Evidence how the scheme avoids fragmentation, retains the extent of key habitats such as grazing marsh and maintains the range of environmental conditions supporting ecosystem services.
- **Condition:** Explain how the proposal maintains or improves ecological health and functionality; for example, safeguarding water levels, water quality, hydrology, vegetation structure and soil condition.
- **Connectivity:** Show how the proposal maintains or strengthens physical and functional linkages across habitats. This includes movement pathways for wildlife, hydrological connections between reens and ditches, and permeability across the landscape.
- **Adaptability (Emergent Property):** Demonstrate how the proposal builds the capacity of the ecosystem to respond to environmental change (e.g. climate change, altered hydrology). Include adaptive management and monitoring measures to ensure resilience over time.

Resilience arises from the interaction of all five DECCA attributes. Improvements in one attribute cannot compensate for deterioration in another. For example, increasing ditch density Extent without regard to habitat Extent may reduce grazing marsh area and reduce Diversity.

Proposed land-uses should therefore set out in their GI statement the relevant ecosystem services (referencing Section 4 of The Guidance) and how they will be protected or enhanced and how DECCA-led design has shaped the proposal.

ACTION 3: NNRA Landscape Approach and Functional linkages

All proposed land-uses should maintain and, where possible, enhance the functional linkages between the Gwent Levels NNRA, national, European and internationally protected sites.

The reens, ditches and the grassland habitats of the Gwent Levels all have functional linkage with a number of national, European (National Site Network site, SAC/SPA) and international protected sites (Ramsar) (see Appendix 1). Such links and dependencies should be identified and considered in any proposed land-uses.

All proposed land-uses must ensure that these functional linkages are protected in full and not harmed, severed, or degraded. This includes preventing any direct, indirect, or cumulative effects that could alter the hydrological functioning of the reens and ditches, reduce habitat ecological connectivity, disrupt species movement, their breeding and overwintering requirements, or undermine the ecological processes that support designated site features. Proposals should clearly identify all relevant ecological and hydrological dependencies with nationally, European and internationally protected sites, and must demonstrate that no adverse effects on site integrity will occur. Opportunities to reinforce or restore linkages are encouraged, but avoiding harm is mandatory and enhancement cannot be used as a substitute for safeguarding existing functional relationships.

The Levels provide supporting habitat for essential life cycle processes of many or all the features of the Severn Estuary Marine Protected Area (SPA, SAC Ramsar and SSSI).

Bird features of the Severn Estuary use areas of terrestrial land and coastal waters outside the boundaries of the Marine Protected Areas for feeding, breeding and overwintering. Land-use changes on the Gwent Levels could lead to a reduction in functionality, reducing bird populations and disruption and therefore have adverse effects on site integrity in view of the conservation objectives of an SAC site.. Reen and riparian habitats of the Gwent Levels connect with the River Usk SAC and it is known that commuting otters are supported in the wider Gwent Levels environment. Otters are a feature of the River Usk SAC as well as being an European Protected Species in their own right. Any proposed development or land use therefore need to demonstrate that they have had regard to such adjacent or nearby protected areas and that they have been able to identify whether or not there would be any impacts on their protected features.

The requirements of this Action do not replace or diminish the need to undertake any statutory assessments arising from relevant national, European or international designations. Where applicable, proposed land-uses must be supported by a Habitat Regulations Assessment (HRA) to demonstrate no adverse effects on the integrity of

SACs or SPAs. The same assessment as a matter of policy, should also be applied to Ramsar sites. In addition, projects that meet the thresholds or criteria for Environmental Impact Assessment (EIA) must provide a comprehensive evaluation of potential environmental effects, including those on ecological connectivity and hydrological functioning. These statutory processes operate alongside this Action and must be completed in full to ensure compliance with legal obligations.

ACTION 4: Protected Habitats and Species within the NNRA

Proposed land-uses within the NNRA must provide robust evidence showing how protected habitats and species have been protected and supported, including the maintenance of ecological connectivity and enhancement of ecosystem resilience across the landscape.

Protected habitats and species in Wales are protected through legislation that affords statutory protection to important habitat types as well as to individual species. The Conservation of Habitats and Species Regulations 2017 provide strict protection for designated habitats and for European Protected Species, making it an offence to damage or destroy protected habitats and to disturb protected species or damage or destroy the breeding and resting places they depend on. This is directly relevant to the Gwent Levels, where otters use the main drainage network and bats forage along tree-lined field boundaries, reens and ditches.

The Wildlife and Countryside Act 1981 provides statutory protection for a wide range of habitats and species across the Levels, safeguarding designated sites as well as individual species wherever they occur. The Act protects all wild birds, their nests and eggs, and many other notable species present on the Gwent Levels, including lapwing, curlew and grasshopper warbler, which depend on open wet grasslands. The NNRA also supports important invertebrates such as the Shrill Carder Bee; a highly threatened bumblebee associated with flower-rich grasslands. Additional protection for both habitats and species are provided by other legislation, including the Protection of Badgers Act 1992, the Countryside and Rights of Way Act 2000, and duties under the Natural Environment and Rural Communities Act 2006, all of which reinforce the need for development proposals to fully consider their potential ecological impacts. Further information can be found in [TAN 5 Nature Conservation and Planning](#).

Land-use proposals must also consider the Section 7 lists under the Environment (Wales) Act 2016, which identifies habitats and species of principal importance for maintaining and enhancing biodiversity in Wales. These can be accessed via: [Welsh Government Section 7 Species List](#) and [Wales Biodiversity Partnership](#). These national lists include species characteristic of the Gwent Levels, such as water voles, otters, dormice, multiple bat species, Shrill Carder Bee, and a range of

wetland and coastal birds including lapwing and curlew. They also include the key habitats found across the Levels, including coastal and floodplain grazing marsh, lowland fen, reedbed, coastal saltmarsh, intertidal mudflats, wet woodland, flower-rich grassland, and the extensive network of freshwater reens and field ditches with their associated emergent vegetation.

As Section 7 lists are produced at an all-Wales scale those considering proposals for any land-use must supplement national lists with local biodiversity information. To ensure proposals within the NNRA are informed by accurate and locally relevant ecological evidence, applicants should engage early with the LPA ecologist, NRW, [Gwent Wildlife Trust](#) (GWT), [Local Nature Partnerships](#) (LNP) and the [Living Levels Partnership](#). These organisations can help applicants identify which key species and habitats are most likely to be present, determine the level of survey effort required, and understand ecological connectivity across the wider Gwent Levels landscape. Their input will ensure that proposed land-uses provide the robust evidence needed to demonstrate how protected habitats and species have been safeguarded and supported, how ecological connectivity is maintained, and how ecosystem resilience is enhanced across the NNRA.

ACTION 5: Cumulative considerations

Proposed land-uses should demonstrate that they have considered any realistic effects which could result in cumulative effects with other activities in the NNRA and set out proportionate measures to address these where necessary.

The purpose of Action 5 is to ensure that the effects of incremental land-use proposals within the NNRA do not undermine the ecosystem functions, GI networks, landscape character, visual amenity and overall resilience that the NNRA is designed to protect and enhance. These functions including; water management, habitat connectivity, soil health, carbon storage and flood resilience, operate at a landscape scale. This means that the effects of individual proposals can, if not properly understood, weaken or fragment these functions in ways that are only visible when the wider NNRA context is taken into account.

To avoid disproportionate assessment requirements, Action 5 focuses on proportionate consideration of potential cumulative effects only where there is a realistic connection by which a proposal could erode or prevent the delivery of these key ecosystem or GI functions. The emphasis is not on undertaking broad or speculative studies but on demonstrating, in a focused and evidence-led way, that a development will not compromise the resilience objectives for the NNRA.

A connection (or pathway when specifically referring to ecological matters) is a realistic link by which an effect from a development could reach and influence an environmental feature, process, or function within the NNRA. For example, rainwater from a development site drains into the same ditch network that supports wetland habitats; this creates a hydrological connection by which changes in run-off could affect those habitats.

Proposed land-uses should therefore evidence how it maintains or enhances the NNRA's key functional elements, such as habitat linkages, natural hydrological pathways, floodplain storage, ecological connectivity, soil resource quality, climate adaptation and well-being value. Where a proposal has the potential to constrain or interrupt these functions it should be demonstrated how the design has avoided, minimised or mitigated such impacts.

The cumulative effects which can arise impacting landscape character (such as visual and cultural) must also be taken into account in line with PPW and local landscape policies.

ACTION 6: Delivery Mechanisms to secure the long-term resilience of the NNRA

Proposed land-uses must demonstrate how they will protect and enhance the long-term resilience of the NNRA and its designated sites, ensuring that short-term benefits do not compromise future sustainability.

To achieve this, proposals should:

- 1. Provide comprehensive information at submission, including survey data, mitigation and/or compensation measures, and biodiversity enhancement plans.**
- 2. Avoid reliance on pre-commencement conditions for NBB, mitigation or compensation detail.**
- 3. Demonstrate how evidence has informed and justified the proposal's design and approach, using sources such as SSSI citations and Local Nature Recovery Action Plans.**
- 4. Demonstrate that proposed mitigation measures are evidence-based and proven effective in similar habitats and ecosystems.**

Land-use proposals within the NNRA must demonstrate, at submission, how they will protect and enhance the long-term ecological resilience of the Gwent Levels and its designated sites. Because of the exceptional sensitivity of the Core Zone, short-term gains must not compromise future ecosystem integrity.

All ecological information must be provided upfront. This includes survey data, avoidance and mitigation strategies, compensation proposals, and details of NBB. While the levels of information required should be proportionate to the nature and scale of the proposal, deferring ecological information to pre-commencement conditions will not generally be supported - and will not be accepted within the Core Zone.

Proposals must demonstrate how existing evidence has informed the design and overall approach. Relevant sources include:

- SSSI citations and management statements
- Priority Habitat inventories
- Local Nature Recovery Action Plans
- Species records and local ecological datasets.

The Gwent Levels Guidance and REN map provide useful context, but they do not act as a substitute for detailed and site-specific ecological survey work legally required for protected sites. All proposals must therefore be supported by surveys that meet recognised standards, such as those set out by NRW and by [CIEEM](#). Where mitigation is proposed, applicants must demonstrate that the measures are supported by credible evidence and are known to be effective in comparable habitats and ecosystems. Mitigation that cannot be supported by evidence of likely success should not be progressed.

Proposals must also provide clear management and monitoring arrangements that are proportionate to the scale and impact of the development. These arrangements should set out the ecological objectives, the monitoring methods and responsibilities, the anticipated timescales, and the approach to adaptive management. Proposals must also explain how long-term delivery will be secured through planning conditions, legal agreements, or where appropriate, financial safeguards. Planning conditions and Section 106 agreements should be used to secure the long-term implementation and monitoring of ecological measures. LPAs may consider lawful financial mechanisms (e.g. bonds) to ensure compliance where necessary. Contributions secured towards facilitating priorities set out in Local Nature Recovery Action Plans (including GI plans) will have their own monitoring frameworks in place.

The Gwent Levels NNRA Core Zone

Strategic Principle 2: The Gwent Levels Core Zone

The integrity and resilience of the Gwent Levels Core Zone must be maintained and strengthened as a well-connected landscape, ensuring its unique character and vital ecosystem services are protected, restored, and enhanced for future generations.

The Core Zone area designated by The Guidance is defined by the interactive [Gwent Levels NRW REN map](#). This map is the definitive reference for the Core Zone in all planning policy and development management decisions.

Strategic Principle 2 applies to the Core Zone only and builds on and complements the requirements set out in Strategic Principle 1.

The aim of this Strategic Principle aim is to protect, restore and enhance the Core Zone. As set out in Section 4 the Core Zone is made up of statutory designations such as Sites of Special Scientific Interest (SSSIs) and is therefore the most sensitive part of the NNRA in terms of its environmental, cultural and historic character.

[PPW Chapter 6](#) makes it clear that certain locations are fundamentally unsuitable for development and should be avoided at the outset of site selection. PPW confirms that **designated sites are to be excluded from site searches**, reflecting a presumption against development in environmentally sensitive areas such as SSSIs (para 6.4.24-6.4.26 and Figure 13 of PPW). This principle is also extended to sites containing protected species and habitats that are irreplaceable (see PPW paragraph 6.4.15 (1b)).

PPW does however recognise that **some minor development may be appropriate** in specific, limited circumstances, particularly where small-scale works are necessary for ongoing site conservation management. Accordingly, Strategic Principle 2 and its accompanying Actions build on the NNRA's Strategic Principle and Actions to ensure that the Core Zone is preserved and reinforced as a coherent, resilient and fully functioning landscape. This is essential to securing the continued protection and enhancement of its unique character, ecological processes and irreplaceable ecosystem services.

ACTION 7: Strategic Opportunities for NBB within the Core Zone

The Core Zone may provide strategic opportunities to deliver off-site NBB from development proposals elsewhere within the NNRA or outside it, provided they

fall within the administrative boundaries of the three constituent LPAs. This applies where it is not possible to achieve appropriate NBB through the step-wise approach on-site. On-site provision should always be the default, with off-site compensation targeted to the Core Zone from those locations outside of only where the step-wise approach has been applied and NBB cannot be provided on-site.

Development outside the Core Zone may offer significant opportunities to deliver NBB that directly contribute to the Core's recovery and enhancement. The Core can act as a recipient for NBB, ensuring that investment strengthens habitat networks, supports hydrological integrity and addresses vulnerabilities. Action 7 provides additional direction for circumstances where off-site NBB is required and the Core Zone is being considered as a potential receiving location.

The Core Zone represents the most ecologically important and sensitive part of the NNRA. It contains the habitats and ecological functions that are fundamental to the long-term resilience of the Gwent Levels and underpins the integrity of the wider ecological network. Because of this strategic importance, the Core Zone may offer the most effective location for securing off-site NBB from elsewhere, where such measures are justified in full accordance with PPW and only after on-site delivery has been demonstrated to be unachievable.

Off-site NBB directed to the Core Zone may come from development proposals within any of the three constituent LPAs, provided those proposals are located outside the Core Zone, as developments within the Core are already required to deliver NBB on-site.

Where the Core Zone is proposed as the receiving location for off-site NBB, applicants must provide clear and proportionate evidence showing why directing enhancement to the Core is the most beneficial option. This should demonstrate how the measures would outperform what is achievable on or adjacent to the proposed development site, and how they will directly strengthen the Core Zone's resilience, condition or ecological connectivity. Proposed measures should seek to add to the scale and magnitude of existing and identified actions and which can be demonstrated to be underway or already secured as part of a relevant action plan.

Given the Core Zone's strategic role, LPAs will need to work collectively— at a regional scale—to establish a shared set of priority actions capable of receiving developer contributions in a coordinated and effective way. Until this programme is in place, applicants should work with LPAs and recognised partners such as NRW, the Living Levels Partnership, Gwent Wildlife Trust and Local Nature Partnerships to identify suitable, evidence-based measures that support the Core Zone's long-term

resilience. This should take into account any existing or emerging Local Authority GI Strategies and Local Nature Recovery Action Plans (see Section 6).

ACTION 8: Core Zone Features and Supporting Habitats

The loss of any features, characteristics or their supporting habitats within statutory sites in the Core Zone must be avoided. For statutory designated sites within the Core Zone, the term ‘features’ should be understood to include both ‘notified’ and ‘qualifying’ features equally. All Section 7 priority habitats must be safeguarded, restored, and enhanced to maintain ecological integrity, and any further loss must be avoided

Action 4 sets out the statutory protections, ecological duties and assessment requirements that must be considered when evaluating land-use proposals within the NNRA. Action 8 sets out additional considerations for the Core Zone.

Within the Core Zone, designated sites contain ecological features and supporting conditions that must be protected from loss or deterioration. For statutory sites, these features include both notified features and qualifying features, and both categories must be treated with the same level of importance.

Notified features are the habitats, species and characteristics that are formally listed on the legal notification for statutory protected sites. They identify the reasons for the site’s designation and provide the basis for assessing its condition. Qualifying features are additional habitats or species that justify a site’s value at national or international level. In terms of SSSIs, features may contribute to other designations such as SACs or Ramsar sites even if they are not individually listed on the original SSSI notification. They may include mobile species, wider habitat interests or ecological processes that form part of the site’s recognised significance. Although they may not appear on the notification documents, they require the same level of protection as notified features, and any loss or deterioration must be avoided.

The loss of any of these features, their attributes or the habitats that support them within designated sites in the Core Zone must be prevented. Protection includes the physical extent of features and the environmental conditions that allow them to function. This includes water levels, water quality, vegetation structure, ecological processes and the characteristic wetland functions of the Gwent Levels.

All Section 7 priority habitats within the Core Zone must also be safeguarded, restored and enhanced. These habitats are essential to the coherence of the Gwent Levels landscape. They support species movement, maintain water dependent processes and contribute to the resilience of the wider ecosystem. Preventing further

loss is essential to maintaining both the integrity of designated sites and the functioning of the surrounding landscape.

Land-use proposals must clearly set out how all designated features, including both notified and qualifying interests, will be protected and maintained. They must also demonstrate how Section 7 priority habitats will be safeguarded and enhanced. A robust and evidence-based approach is required so that direct and indirect impacts are avoided, supporting conditions are preserved and long-term ecological improvement is achieved across the Core Zone.

ACTION 9: Core Zone Landscape-scale Integrity and Resilience

To achieve protection, restoration, and enhancement, the Core Zone should function as a single, integrated landscape. The Core Zone must be managed and enhanced so that, in its entirety, it achieves and maintains favourable condition at a landscape scale.

Delivering protection, restoration and enhancement across the Core Zone requires it to be managed as a single, interconnected landscape. The reens, ditches, watercourses and supporting grassland habitats operate together as an integrated ecological system. Any proposed land-use within the Core Zone must therefore provide clear evidence showing how it has assessed and addressed potential effects on these landscape-scale processes.

Protection in this context means avoiding further fragmentation and preventing any permanent loss of the extent of SSSI features. Proposals should demonstrate how ecological connectivity will be maintained, how irreversible impacts will be avoided, and how the functioning and resilience of the landscape will be supported.

Some areas of the Core Zone are currently in unfavourable condition. This means that protected features – habitats or species – are not meeting all conservation objectives. Unfavourable condition often results from suboptimal or inappropriate management, which is temporary and reversible, and should not be used to justify further loss of SSSI features. Suboptimal indicates that whilst something is below a desired standard it is still functioning and has the potential for improvement. Permanent adverse impacts, such as the loss of SSSI habitat or habitats required for SSSI species, represent irreversible change. Since the extent of features is a key measure in [Common Standards Monitoring](#) (the Joint Nature Conservation Committee), proposals must show how permanent losses are avoided or minimised.

Where suboptimal conditions are present, proposals must demonstrate how they will avoid turning temporary or manageable unfavourable conditions into permanent habitat loss or fragmentation.

ACTION 10: Water availability and hydrology within the Core Zone

Proposed land-uses within the Core Zone should be accompanied by evidence that:

- 1) They will not adversely affect water availability or the functioning of the drainage system within the Core Zone.**
- 2) They will not adversely affect water quality or the ecological condition of the drainage network, ensuring the continued support of SSSI features and associated habitats.**
- 3) The ecological integrity of the water network is maintained by safeguarding and enhancing functional linkages between habitats, species, and water bodies, ensuring that connectivity across the landscape is preserved and not fragmented.**

The hydrology on the Gwent Levels is complex with **water levels** underpinning the SSSI features. Without sufficient water depths, aquatic plants and invertebrates which are the features of special interest will not be able to persist.

The drainage network is constructed so that drainage occurs primarily through gravity. Water levels are managed by various water level control structures including penning sluices, and more recently tilting weirs. During the summer months, a high Summer Penning Level is maintained, for a variety of reasons. These traditionally included agricultural purposes, wet fencing and stock watering, but are now also managed for nature conservation purposes. This management practice essentially creates a static water body during the summer period. During the winter the water level is lowered to a Winter Penning Level to retain capacity for flood water to drain from the land into the drainage network and discharge to the Severn Estuary. To maintain this traditional drainage approach, it is important that all discharges to the Gwent Levels drainage network occur at the equivalent of greenfield run-off rate. Therefore, water levels must be managed across large areas, and changes to water availability due to new development or changes to land-use could have significant effects.

Conditions may reduce if there are impacts on water availability, which directly supports the aquatic plant and invertebrate features of the SSSI (e.g. the creation of new field ditches may require additional water to function). There is an acknowledged lack of water availability, as the reens and ditches are fed only by natural inputs including rainfall, springs, and winter run-off from the northern hills. Water availability to both new and existing ditches is critical, without sufficient water SSSI aquatic features (both plants and invertebrates) cannot be supported and will be unable to complete their lifecycles.

The Gwent Level watercourses provide a vital link (**connectivity**) between areas, maintaining the associations between watercourses that are in different management rotations. This ensures plant and animal communities do not become isolated from each other and also helps them move in order to adapt to a changing climate (adaptability).

As a habitat, a reen or field ditch includes a seasonal or permanent water channel, a bed of underlying material, banks that may be bare or vegetated, and a surrounding vegetated margin. The widths of these features differ greatly, and this changing depth and shape helps to boost biodiversity by offering a variety of habitats and safe refuges for vulnerable or rare species.

The various species of the Gwent Levels rely on different combinations of habitat features, including:

- **Water** that varies in quality, depth and permanence.
- **Substrate** on the ditch bottom, usually clay or peat.
- **Vegetation and ditch-cleaning management**, which influence what can grow and which species can survive or complete their lifecycles.
- **Bank sides** with differing soil types and slopes, providing a range of micro-habitats.
- **Bank tops** that vary in vegetation and width, depending on how close cultivation and other land-management activities occur on neighbouring land.

Together, these features create the variety of conditions needed to support a wide range of species which make the Gwent Levels distinctive and resulted in its NNRA status.

For these reasons, it is important that any proposed land-uses demonstrates how it meets the requirements of Action 10.

ACTION 11: Traditional Nature-based Management Practices within the Core Zone

Traditional forms of agricultural management must be retained in relation to banksides and grasslands adjacent to reens and ditches in determining any proposed land-uses within the Core Zone.

The banksides and grasslands next to the watercourses in the Levels depend on the continued use of traditional agricultural management, particularly horse, sheep, and cattle grazing. Livestock naturally maintain a mix of grass heights and ground conditions, which creates important habitat niches for invertebrates. Grazing also keeps the growth of reeds, brambles, scrub, and other vegetation under control, preventing overshading and helping protect the ecological features of the SSSI.

When these areas are fenced off, traditional grazing no longer takes place and must be replaced with active management such as cutting or flailing. These alternatives are not always carried out regularly or effectively.

For any adjoining proposed land-use that meets the tests set by PPW with regards SSSIs and irreplaceable habitats, the responsibilities for ongoing management, and the practical means to deliver it, must be clearly defined, agreed with NRW, and secured in perpetuity.

The Gwent Levels NNRA Recovery (Opportunity) Zone

Strategic Principle 3: The Gwent Levels Recovery (Opportunity) Zone

Within the Recovery (Opportunity) Zone, proposed land-uses should identify, safeguard, and integrate opportunities to enhance resilience and improve connectivity within and between habitats, species, and ecosystem services of the Gwent Levels Core Zone. Proposals should also prioritise strategic green infrastructure that delivers multiple benefits.

The Recovery (Opportunity) Zone areas designated by The Guidance are defined by the interactive [Gwent Levels NRW REN map](#). This map is the definitive reference for the Recovery (Opportunity) Zone in all planning policy and development management decisions.

Strategic Principle 3 applies to the Recovery (Opportunity) Zone, building on and complementing the requirements set out in Strategic Principle 1.

The aim of this Strategic Principle and that of the Recovery (Opportunity) Zone, is to deliver NBB that support the resilience, connectivity, and long-term recovery of the Core. Development in the Recovery (Opportunity) Zone must therefore contribute positively to nature recovery, in line with PPW.

The term **Recovery** does not imply that the area is degraded or in need of repair. Instead, it highlights locations where targeted improvements can enhance resilience and deliver wider landscape-scale benefits, particularly in relation to the Core Zone. These areas therefore represent opportunities, which is why the term **Opportunities** is incorporated for planning purposes when referring to the Recovery Zone throughout The Guidance.

Within this Zone, landowners, stakeholders and partners should identify opportunities—guided where appropriate by DECCA—to enhance green infrastructure, ecosystem services, biodiversity resilience, and the wider ecological network that supports the Core Zone.

Whilst it plays a key role in supporting the Core Zone, the Recovery (Opportunity) Zone is important in its own right. Large parts of the Zone consist of existing green infrastructure, including the coastal path, waterways and areas of open space and parkland.

ACTION 12: Safeguarding land within the Recovery (Opportunity) Zone

The ecological network and ecosystem services of the Recovery (Opportunity) Zone should be safeguarded to strengthen the resilience and adaptability of the Core Zone. Proposed land-uses should evidence how they will safeguard and enhance connectivity to and the resilience of the Gwent Levels Core Zone.

Building on Action 1 and 2, land-use proposals within the Recovery (Opportunity) Zone, should identify, safeguard and integrate opportunities to enhance ecological resilience and improve connectivity within and between habitats, species populations and ecosystem service functions. This includes seeking opportunities for habitat creation or enhancement, restoring hydrological or landscape features, and supporting the wider ecological networks that underpin the functionality of the Core. Proposed land-uses should therefore be designed to deliver measurable benefits that contribute to the overall ecological coherence of the Gwent Levels.

Proposals within this Zone should also prioritise the provision of strategic green infrastructure capable of delivering multiple benefits, including flood management, carbon sequestration, biodiversity enhancement, recreation and landscape character improvements. The Recovery (Opportunity) Zone provides a key location where NBB arising from development can be effectively channelled to deliver meaningful outcomes at landscape scale (See Action 14).

Through this approach, the Recovery (Opportunity) Zone supports a resilient, multifunctional landscape that reinforces the Core Zone, contributes to the integrity of the NNRA, and delivers long-term wellbeing benefits for local communities and the wider environment.

ACTION 13: Recovery (Opportunity) Zone Protected Species and Habitats

In the Recovery (Opportunity) Zone, protected habitats and species must be protected, restored, and enhanced. All Section 7 priority habitats should be maintained and enhanced to ensure ecological integrity, and any further loss should be avoided.

Action 4 sets out the statutory protections, ecological duties and assessment requirements that must be taken into account when considering proposed land-uses. Action 13 sets out additional considerations for proposals within the Recovery (Opportunity) Zone.

The Recovery (Opportunity) Zone forms an essential part of the wider ecological network of the Gwent Levels. These areas provide space for habitat improvement,

ecological connectivity and the strengthening of ecosystem resilience across the landscape. Within the Recovery (Opportunity) Zone, protected habitats and protected species must be protected, restored and enhanced. This includes preventing deterioration of conditions that support protected species and ensuring that habitats of recognised conservation value are maintained in good ecological condition.

In addition, all Section 7 priority habitats within the Recovery (Opportunity) Zone should be maintained and enhanced so that they continue to support ecological integrity at a landscape scale. These habitats contribute to the functioning of hydrological processes, provide movement corridors for species and sustain the characteristic wetland and grassland mosaics of the Levels. Avoiding further loss is essential in order to maintain the coherence and resilience of the wider ecological network.

Proposals within the Recovery (Opportunity) Zone must therefore demonstrate how protected habitats and species will be fully safeguarded and enhanced. They must also show how Section 7 priority habitats and species will be maintained, enhanced and protected from any further loss. This requires a clear and evidence-based approach that prevents adverse effects, strengthens ecological function and contributes to long term restoration across the Recovery (Opportunity) Zone.

ACTION 14: Strategic Opportunities for NBB within the Recovery (Opportunity) Zone

The Recovery (Opportunity) Zone may provide strategic opportunities to deliver off-site NBB from development proposals elsewhere within the NNRA or outside it, provided they fall within the administrative boundaries of the three constituent LPAs. Like in the Core Zone, this applies only where it is not possible to achieve appropriate NBB through the step-wise approach on-site in compliance with PPW; and

- 1. Additional opportunities within the Core Zone have been fully considered, and a clear justification provided why these are not being pursued; and**
- 2. Opportunities within the Recovery (Opportunity) Zone can be evidenced to deliver NBB that are equal to or greater than those achievable in the Core Zone or are fundamental to improvements within the Core Zone.**

The overarching requirements for delivering NBB, including the primacy of on-site enhancement and the mandatory application of the PPW step-wise approach are set in Action 1. Action 14 applies **only** where off-site NBB is required and justified in accordance with PPW.

The Recovery Zone plays a distinct role within the NNRA as an area capable of supporting landscape-scale ecological enhancement, expanding habitat networks, and strengthening the ecological processes that underpin the Core Zone. For this reason, it may offer suitable opportunities for additional NBB delivery where elsewhere (other than the Core Zone), on-site enhancement is not achievable and where additional opportunities in the Core Zone (in accordance with Action 7) are either unavailable, unsuitable or demonstrably unable to deliver equivalent benefits.

As with Action 7, off-site NBB directed to the Recovery (Opportunity) Zone may come from development proposals within any of the three constituent LPAs, provided those proposals are located outside the Core Zone, as developments within the Core are already required to deliver NBB on-site.

Where the Recovery (Opportunity) Zone is being considered as a recipient of off-site NBB, applicants must provide clear and robust evidence addressing the criteria set out in Action 14.

Where the Recovery (Opportunity) Zone is proposed as the receiving location for off-site NBB, clear and proportionate evidence should be provided showing why directing enhancement to this Zone is the most beneficial option. This should demonstrate how the measures would outperform what is achievable on or adjacent to the development site, and how they will directly strengthen the Core Zone's resilience, condition or ecological connectivity.

Enhancement measures within the Recovery (Opportunity) Zone should focus on actions that reinforce ecological connectivity, restore or expand key habitats, and support the wider GI network. These measures must contribute to functioning ecological networks at scale and align with spatial priorities identified through REN mapping, Local Authority GI Strategies, and Local Nature Recovery Action Plans (including those of the Living Levels Partnership). They should be designed to address network gaps, strengthen corridors, and support ecological processes that enable the Core Zone to function more effectively.

Given the Recovery (Opportunity) Zone's strategic role in strengthening the resilience of the Core Zone, LPAs will need to work collectively— at a regional scale—to establish a shared set of priority actions capable of receiving developer contributions in a coordinated and effective way, with a clear monitoring framework. Until this programme is in place, applicants should work with LPAs and recognised partners such as NRW, the Living Levels Partnership, Gwent Wildlife Trust and Local Nature Partnerships to identify suitable, evidence-based measures that support the Core Zone's long-term resilience. This should take into account any existing or emerging Local Authority GI Strategies and Local Nature Recovery Action Plans (see Section 6).

Appendix 1: Gwent Levels Designations:

Name	Designation Type
Severn Estuary Ramsar	Ramsar site
Severn Estuary Special Protection Area	Special Protection Area
Severn Estuary Special Area of Conservation	Special Area of Conservation
River Usk Special Area of Conservation	Special Area of Conservation
Rumney and Peterstone	Site of Special Scientific Interest
St Brides	Site of Special Scientific Interest
Nash and Goldcliff	Site of Special Scientific Interest
Whitson	Site of Special Scientific Interest
Magor and Undy	Site of Special Scientific Interest
Redwick and Llandeenny	Site of Special Scientific Interest
Magor Marsh	Site of Special Scientific Interest
Historic Landscape of Outstanding Historic Interest in Wales	Historic Landscape
Allt-yr-Yn	Local Nature Reserve
Newport Wetlands	National Nature Reserve
Penhow Woodlands	National Nature Reserve
Woodland Trust Reserve at Craig y Wenallt	Site of Importance for Nature Conservation

Other Gwent Levels Designations:

Various Sites of Importance for Nature Conservation	Consult the 3 individual Local Authorities for details.
Various Conservation Areas	Consult the 3 individual Local Authorities for details.
Various listed buildings	Consult the 3 individual Local Authorities for details.
Special Landscape Areas	Consult the 3 individual Local Authorities for details