Llywodraeth Cymru
Welsh Government

Gwent Levels Planning Guidance

Integrated Sustainability Appraisal:
Draft Scoping Report
Report of Consultation Responses

Welsh Government: February 2026

1. Introduction

The Welsh Government undertook a focused, non-statutory consultation on the Integrated Sustainability Appraisal (ISA) Draft Scoping Report for the emerging Gwent Levels Planning Guidance. Although not required under the SEA Regulations at this stage, a targeted consultation was carried out as best practice due to the sensitivity of the Gwent Levels landscape, the technical nature of the assessment, and the importance of ensuring that statutory bodies, local authorities, specialist organisations, and relevant internal Welsh Government teams had the opportunity to comment early in the process.

The consultation focused on:

- statutory environmental bodies
- local authorities covering the Gwent Levels
- NGOs and cross-border bodies
- internal Welsh Government Directorates with specialist input (Children's Rights, Climate Change, Marine & Biodiversity, Welsh Language, etc.)

Ten structured questions were issued, aligned to the ISA process.

2. Summary of Consultation Responses

Below is the formal Welsh Government consultation structure:

- Question heading
- Summary of responses (Most / Some / A few)
- Welsh Government response (explicit consultee-linked actions)

Question 1 – Review of Relevant Plans, Programmes and Environmental Protection Objectives

Q1: Do you support the findings of the review of relevant plans, programmes and environmental protection objectives? Are there any additional plans, programmes or environmental protection objectives you would like to add? If so, what are they and why? Are there any that you would like to remove from the review? If so, which one(s) and why? (Stage A1 and Appendix A)

Summary of Responses to Question 1

Most respondents supported the plans and programmes listed, with several proposing additions. NRW, Natural England, Monmouthshire County Council and the Living Levels Partnership suggested a range of relevant national and cross-border plans that should be included.

Some respondents, including Newport City Council, proposed further technical documents; a few questioned the inclusion of older evidence or documents without clear policy status.

Welsh Government Response

Following NRW's recommendation, the references to SSSI duties were strengthened and fully updated. Natural England's request for cross-border strategic plans was implemented, and these have been added to Appendix A. Monmouthshire County Council's LNRAP has been included in full. A suggestion to recognise Gwent Levels as a potential National Landscape was not implemented, as this relates to the guidance rather than the scoping stage. Certain unpublished or out-of-date evidence documents suggested was not accepted, as they lacked formal WG endorsement.

Question 2 – Baseline Information

Q2: Do you agree with the baseline information that we have identified? Is this explained at an appropriate scale? If not, can you explain why and provide a link to the any alternative or further evidence? (Stage A2 and Appendix B)

Summary of Responses to Question 2

Most respondents agreed with the baseline presented. NRW, Cadw, Natural England, and others proposed additions, clarifications, and updated data sources. Some respondents emphasised the need to reference “functionally linked land and water” and nutrient neutrality. A few highlighted evidence gaps on species and habitats.

Welsh Government Response

NRW’s comments led to corrections on waterbody classifications and improved referencing. Cadw’s request to include the Gwent Levels Historic Landscapes Character Area report has been fully implemented. Natural England’s suggestions on functional linkages and nutrient impacts have been incorporated into the baseline narrative. The wider climate-related risks has been reflected. Evidence gaps highlighted by the Living Levels Partnership were acknowledged, though the collection of new data is a matter for future guidance and implementation work, not the scoping stage.

Question 3 – Sustainability Issues and Opportunities

Q3: Do you agree with the sustainability issues that we have identified? If not, which one(s) and why? Are there additional issues that the ISA should consider? If so, what are they? (Stage A3 and Table 4-1)

Summary of Responses to Question 3

Most respondents agreed with the issues and opportunities. Some respondents, notably NRW and Natural England, sought expanded material on ecosystem resilience, drainage systems, and sustainable land management. The need to emphasise access to nature and recreational opportunities for children and young people. A few respondents proposed additional local opportunities, such as support for fresh food production.

Welsh Government Response

Revised wording across Table 4-1 was added to emphasise access, play, and rights-based framing. NRW's comments resulted in clearer definitions of "natural drainage system" and more explicit reference to ecosystem resilience. Natural England's proposals regarding access to nature and sustainable land management were integrated. Monmouthshire County Council's point on resilient local food systems was added to the opportunities table. Requests for overly specific technical documents (e.g., SMP2) were not added at this stage.

Question 4 – ISA Objectives and Questions

Q4: Are there any changes you consider should be made to the ISA Objectives or Questions? If so please specify the changes sought the reason for the suggested changes. (Stage A4 and Table 5-1)

Summary of Responses to Question 4

Most respondents supported the objectives. Some respondents proposed refinements: including stronger references to participation rights; adding “grips” to landscape feature references; explicit reference to buried archaeology; and inclusion of irreplaceable habitats.

Welsh Government Response

Children’s Rights Team proposals have been implemented by expanding references to Articles 12 and 2 of the UNCRC. NRW’s recommendations on flood resilience and “grips” are incorporated into the revised ISA objectives. Cadw’s request on buried archaeology has been added as a new objective. RSPB’s proposal to reference irreplaceable habitats (as defined by PPW) has been incorporated. Some Natural England comments on geographic scope have been addressed through wording refinements.

Question 5 – Development of Reasonable Alternatives

Q5: Do you have any comments regarding how reasonable alternatives should be developed?

Summary of Responses to Question 5

Some respondents, including Newport City Council, advised that reasonable alternatives should consider Sustainable Alternative Natural Greenspaces (SANGs) for mitigation. A few emphasised the need for a step-wise approach to ecological impact.

Welsh Government Response

Newport City Council's points have been noted and will inform the next stages of the ISA. Suggestions that relate to the detailed policy approach for the Guidance rather than the scoping stage have been deferred appropriately.

Question 6 – Scope of the ISA and Proposed Appraisal

Q6: Do you have any further suggestions regarding the scope of the ISA and its proposed appraisal of the Gwent Levels Planning Guidance?

Summary of Responses to Question 6

Most respondents supported the scope. NRW requested changes to the lifecycle diagram showing consultation and publication stages. Some noted procedural clarifications.

Welsh Government Response

NRW's recommended changes to Figure 1-1 have been completed. Procedural comments were useful but did not require changes to the scoping document itself.

Question 7 – Integration of Impact Assessments

Q7: Do you support the approach to the integration of the impact assessments? If not please specify your reasons.

Summary of Responses to Question 7

Most respondents supported the integrated approach. Children's Rights Team recommended explicit use of the UNCRC articles and coding/tagging for accessibility. Some respondents queried relationships between statutory and non-statutory assessments.

Welsh Government Response

Children's Rights Team guidance has been incorporated, with Articles 2, 12, 13, and 42 now explicitly referenced. The web coding request has been passed to the WG web team. Clarifications on assessment scope will be addressed through final ISA structuring but did not require changes to the scoping stage.

Question 8 – Initial Screening Findings (Table 2-1)

Q8: Do you support the findings of the initial screening work for the impact assessments in Table 2-1? If not please specify which findings and your reasons.

Summary of Responses to Question 8

Most respondents supported the screening outcomes. Some requested additional articles (UNCRC) or more detail on potential negative impacts.

Welsh Government Response

Children's Rights Team's request for additional UNCRC articles led to expanded screening coverage. NRW's request for stronger explanation of impact significance has been noted for the next ISA stage.

Question 9 – Additional Baseline Data or Evidence

Q10: Are there additional pieces of baseline data or evidence that the ISA should consider with specific regard to the impact assessments in Table 2-1? If so please specify what these are and why they should be used, along with where or how they can be accessed.

Summary of Responses to Question 9

Some respondents suggested further datasets, including cross-border ecological data and climate adaptation literature. Children's Rights Team highlighted General Comment No. 26 and the UNCRC Concluding Observations. A few respondents stressed significant gaps in ecological baseline information in general.

Welsh Government Response

Children's Rights Team references have been added to Appendix B. Requests for extensive new ecological datasets have been acknowledged but are outside the scope of the scoping stage. Where possible, cross-border sources have been referenced.

Question 10 – Other Comments

Q10: Do you have any other comments?

Summary of Responses to Question 10

All respondents provided supportive final comments with only 3 respondents providing recommendations. NRW highlighted the need to clarify management responsibilities for reens and ditches. Children's Rights Team encouraged child-friendly formats. Other comments were better implemented into the guidance.

Welsh Government Response

NRW's recommended wording on management responsibility has been implemented. Children's Rights advice on children-friendly communication has been noted for publication design. Landscape-designation proposals are outside the ISA scope, so they have been taken forward separately within policy development discussions.

3. Next Steps

All amendments arising from this consultation have been incorporated into the final ISA Scoping Report where appropriate. The final ISA Scoping Report is published at the same time as the publication of the draft Gwent Levels Planning Guidance. Stakeholders will be notified upon publication and implementation work will continue with local authorities, NRW, and specialist internal WG teams as the project moves into the next ISA stage.

4. Appendix A – List of Consultees

Statutory Consultees

- Natural Resources Wales (NRW)
- Cadw

Local Authorities

- Newport City Council
- Monmouthshire County Council
- Cardiff Council

Cross-Border & External Bodies

- Natural England
- Environment Agency
- Marine Management Organisation
- Living Levels Partnership
- Severn Estuary Partnership
- Gwent Levels Working Group

Internal Welsh Government Directorates

- Children's Rights Team
- Climate Change Division
- Welsh Language Unit
- Marine & Biodiversity Division
- Integrated Impact Assessment (IIA) Leads
- Planning Directorate (Future Wales, Gwent Levels Team)