

Item 6 Appendix 1a – Natural Environment and Heritage

Section Title – 7: Natural Environment & Heritage	
Abbreviations	
BMV Best and Most Versatile Agricultural Land CEMP Construction Environmental Management Plan GI Green Infrastructure GIDP Green Infrastructure Development Plan FR Flood Risk FRM Flood Risk Management FRMS North Northamptonshire Flood Risk Management Study (2012) FRSWM Flood Risk and Surface Water Management Policy JCS North Northamptonshire Joint Core Strategy 2011- 2031 (2016) LGS Local Green Space	LLFA Local Lead Flood Authority LFRRMS Northamptonshire Local Flood Risk Management Strategy (2012) NPPF National Planning Policy Framework (2018) OSS Open Space Strategy PPS Playing Pitch Strategy SFRA Strategic Flood Risk Assessment SFS Sports Facilities Strategy SWD Surface Water Drainage SWMP Surface Water Management Plan SSP2 Site Specific Part 2 Local Plan (Consultation Draft (2018)) SuDS Sustainable Drainage Systems
Number of responses: 29	
Summary of main points	
<p>Total number of Objections - 4 Total number of Support - 11 Total number of neither Object nor Support - 15</p> <p>Statutory consultees:</p> <p><u>Anglian Water</u> (id.350); (id.352) <u>Environment Agency</u> (id.434); (id.435) <u>Historic England</u> (id.409) <u>Natural England</u> (id.394) <u>Sport England</u> (id.100) <u>Northamptonshire County Council</u> (id.299); (id.302); (id.303); (id.304); (id.319); (id.320); (id.488); (id.486)</p> <p>Chapter 7 Topics:</p> <p><u>Flood risk and Sustainable Water Management (and Question 4)</u> <u>Green infrastructure (Policy ENV01)</u> <u>Open space, sport and recreation (Policy ENV02)</u> <u>Local Green Space (Incl. Policy ENV03)</u> <u>Biodiversity</u> <u>Heritage</u></p>	
Summary of main points by topic	
Chapter 7	

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Note: Review numbering in this section – there are two para '7.2'

Flood Risk (7.1)

Appreciate timescale issues associated with updating SFRA but note that the current evidence is not up to date. It is unclear whether sites have been subject to the flood risk sequential test. The SFRA should have been completed prior to selecting allocations. **(id.434)**

All major development within Northamptonshire must conform to local as well as national standards as detailed within the 'Local Standards and Guidance for Surface Water Drainage in Northamptonshire'. **(id.488)**

A drainage assessment is a specific requirement of the LLFA for all major applications regardless of whether or not an FRA has been prepared. **(id.488)**

Question 4 (Flood Risk & Sustainable Water Management)

A further policy relating to site specific FR and SWM is not required as Policy 5 of the JCS makes sufficient provision through criteria d) which ensures development will contribute (where appropriate) to specific flood risk management in North Northamptonshire. If the [new] policy does define schemes it should only relate to development that materially affects the relevant parts of the catchment of Slade Brook. **(id.510)**

There are inconsistencies towards FRM across the major development policies. A new policy for FRSWM should reduce confusion and this inconsistent approach. **(id.488)**

Policy 5 of the adopted Joint Core Strategy is sufficient to cover the risk of flooding within our remit. **(id.434)**

FR Scheme proposals

Ensure specific scheme proposals e.g. Slade Brook flood storage, include evidence from an up to date SFRA and / or SWMP. **(id.434)**

Rain gardens, small catchment ponds and the reservoir on Slade Brook **(id.13)**; any schemes draining into River Ise. **(id.258)**

FR policy suggestions

KE/184a is adjacent to Slade Brook and a tributary of the River Ise. Policy wording should include the requirement of Construction Environmental Management Plan as a condition of planning application. **(id.394)**

Policy should refer to SWMP as a whole rather than on specific scheme proposals. **(id.350)**

New policy should be prepared in the context of JCS Policy 5 (Water Environment, Resources and Flood Risk Management). **(id.350)**

Policy or the introduction to such policy should refer to the Flood Toolkit and the Local Standards and Guidance for Surface Water Drainage in Northamptonshire. Policy approach should align with the NPPF and the Local Standards for SWD. **(id.488)**

Include policy that **(id.488)**:

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- requires an FRA/Drainage strategy and incorporation of sustainable urban drainage systems for all major developments.
- requires SuDS as a consideration for all new development not defined as a major development, (ie, of less than 10 dwellings, non-residential sites of less than 1 ha and wind fall sites)
- encourages the retrofitting of SuDS to existing properties

Statement on 'Linking FR / SWM schemes to GI / Biodiversity enhancements' is welcomed. **(id.394)**

Heritage Assets should be included within flood risk and sustainable water management. **(id.409)**

Need policy of this type for any scheme draining into the River Ise. **(id.258)**

Episodes of past flooding shows flood risks still exist. Preventions should be put in place where necessary. **(id.288)**

Surface water drainage schemes are vital to prevent flooding and should be mandatory. **(id.13)**

Biodiversity

Natural environment chapter needs strengthening to be considered sound and compliant with para's 20, 171 and 175c of the revised NPPF with particular policy reference to: **(id.394)**

- avoid impact on designated sites; policy to follow avoid, mitigate, compensate hierarchy
- protect and enhance River Ise and Meadows SSSI from adverse impacts (including direct and indirect impact pathways of development).
- support policy which states that increased sediment loading upstream of River Ise and Meadows SSSI will be avoided.
- include policy wording ensuring MG4 grassland alongside River Ise and within Tailby Meadow Local Nature reserve is protected against recreational pressures associated with increased housing

The section should include policies on biodiversity net gain, soil protection, priority habitats, ecological networks and priority species protection, brownfield sites and the Nene Valley Nature Improvement Area. **(id.394)**

Green Infrastructure

Policy ENV01: Local Green Infrastructure Corridors

There are insufficient references to heritage in the GI section including no reference to undesignated heritage assets and historic landscapes (including ridge and furrow). **(id. 299)**

Does the GIDP have any consideration with regard to the historic environment? **(id.302)**

Excellent [GI] policy - let's hope it is implemented robustly. **(id.15)**

Very pleased to see this [GI Policy] in the plan. Can't work out whether the Twywell Hills and Dales are included [in the network]. This wonderful resource needs to be preserved. **(id.297)**

As a result of the on-site GI provision to the Kettering North employment scheme, the Estate / Buccleuch do not expect to make off-site financial contribution towards the North Kettering

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Country Park. **(id.535)**

GI Scheme proposals

Opportunities to increase the access and easement corridor adjacent to the [River Ise and Slade Brook?] watercourse should be taken and incorporated into specific policies within the Local Plan. **(id.435)**

The proposed development at land off Higham Road in Burton Latimer could meet the aims of Policy ENV01. **(id.290)**

GI Policy suggestions

There is a need to define in what circumstances the requirement for development to contribute to GI projects. As currently drafted it appears to apply to all types and scales of development but it is unclear whether this is the intention. **(id.352)**

Wording to include 'Will not have a detrimental impact on undesignated heritage assets or landscapes' Note: tree planting and habitat creation can be detrimental to archaeological activity. **(id.302)**

Figure 7.1 identifies 'Borough' and 'Local Level' GI Corridors. It's recommended that the Council has a distinct policy approach for each of the relevant levels. **(id.490)**

Thought should be given to how the Borough Level network relates to the wider transport network, for example by considering the benefits tree lined streets, green pedestrian routes, etc. make to the local GI and transport connectivity at the borough level without comprising the wider aims of the GI network. **(id.490)**

Parks are a lifeline for local communities. They need to be protected for the future. **(id.298)**

Open Space and ENV02 (Allotments)

Support the intention of paragraphs 7.17 to 7.22. The open space and sports strategies will provide critical evidence to inform the local plan and site allocations. **(id.100)**

Support a policy based on evidence that protects and enhances existing facilities and identifies the right location for new facilities. **(id.100)**

Support the concept [of policy on allotments] as long as they don't have an impact on known or potential archaeological activity/landscapes. **(id.303)**

Support this although some uses of open space can be detrimental to historic assets. **(id.320)**

Policy ENV02 & Section 10.19 - Allotment provision - seems at odds with the S106 register (see KBC313) monies available and proposed allotment provision within Desborough Open Space. **(id.259)**

[Open space section] All sites proposed are not suitable, are not in keeping with the spirit and aesthetic of the village and are strongly opposed. **(id.349)**

Heritage

Where are the Heritage policies? They are partially hidden in the GI but not explicitly

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mentioned. **(id.319)**

Will there be a heritage section and specific policies to provide more local detail? **(id.409)**

ENV03 (Local Green Space)

Objection to the designation of Site HVI069 on the grounds that it does not conform to national policy and guidance for the designation of a Local Green Space. **(id.343)**

[Policy ENV03 Local Green Space] "local historic significance" assuming this could include non-designated archaeological assets? **(id.304)**

Implications of New National Planning Policy Framework

Section 3 (NPPF) provides a focus on Plan making. Para 20 is a criteria-based policy. It states that strategic policies should set out an overall strategy for the pattern, scale and quality of development. This would usually be applied in the context of the North Northamptonshire Joint Core Strategy which determines the strategic policy for the sub-region. While the policies of the SSP2 are considered as non-strategic there are policies specific to Kettering Borough that have regard to a strategy for the pattern, scale and quality of development. They are therefore 'strategic' in a local perspective. In this context Para 20 requires that the strategy for development should make sufficient provision for, *inter alia*, flood risk and the conservation and enhancement of the natural, built and historic environment, including landscapes and green infrastructure, and planning measures to address climate change mitigation and adaptation.

Section 5 (NPPF) is about delivering a sufficient supply of homes. Para 77 is a criteria-based policy which states that planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the criteria apply. In relation to heritage, development may be considered if it would amount to the optimal viable use of a heritage asset or enabling development that would secure the future of heritage assets.

Section 8 (NPPF) seeks to promote healthy and safe communities. Para 91 is a criteria-based policy that seeks to ensure planning policies and decisions aim to achieve healthy, inclusive and safe places that promote social interaction, are safe and accessible and enable and support healthy lifestyles. Measures promoted include the provision of easy pedestrian and cycle connections within and between neighbourhoods; clear and legible pedestrian routes, safe and accessible green infrastructure, sports facilities and allotments.

Para 92 (NPPF) is a criteria-based policy that seeks to provide the social, recreational and cultural facilities and services the community needs. Planning policies and decisions should plan positively for the provision and use of shared spaces and community facilities; take into account and support the delivery of local strategies to improve health, social and cultural well-being; guard against the unnecessary loss of valued facilities; d) ensure facilities can develop, be modernised and are retained for the benefit of the community; and ensure an integrated approach to considering the location of housing, economic uses and community facilities and services. Open spaces are used as an example of community facilities.

Para 96 (NPPF) states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities. Planning policies should be based on up-to-date assessments of need for open space, sport and recreation facilities. Information gained from the assessments should be used to determine what open space, sport and recreational provision is needed and what opportunities there are for new provision.

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Para 97 (NPPF) is a criteria-based policy that seeks to protect existing open space, sport and recreational facilities. These should not be lost to development unless the needs assessment shows them surplus to requirements; and / or the lost provision would be replaced by an equivalent or better facility and / or the development is for an alternative sports and recreational facility where the benefits outweigh the loss of the former facility.

Para 99 (NPPF) establishes that designating land as Local Green Space (LGS) through local or neighbourhood plans allows communities to protect areas of particular importance to them. The designation should be consistent with local planning and compliment planned investment. LGSs should only be designated through plan preparation or updates and should be able to endure beyond the plan period.

Para 100 (NPPF) is a criteria-based policy setting out that the LGS designation should only be used where: the space is close to the community it serves; is demonstrably special and holds a particular local significance e.g. historic, recreational value, wildlife richness and is local in character and not an extensive tract of land.

Para 101 (NPPF) requires that policies for managing development within a LGS should be consistent with those for Green Belts.

Section 9 (NPPF) concerns the promotion of sustainable transport. Para 102 establishes that transport issues should be considered from the earliest stages of plan making so that opportunities to promote walking, cycling and public transport use are identified and pursued.

Section 12 (NPPF) is about achieving well-designed places. Para 127 is a criteria-based policy setting out that planning policies and decisions should ensure that developments are, *inter alia*, sympathetic to local character and history and create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users.

Section 14 (NPPF) looks at meeting the challenge of climate change, flooding and coastal change. Para 149: Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, water supply, biodiversity and landscapes. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts.

Section 15 (NPPF) seeks to conserve and enhance the natural environment. Para 170 is a criteria-based policy which states planning policies and decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes; recognising the intrinsic character and beauty of the countryside and the wider benefits from natural capital and ecosystem services and minimising impacts on and providing net gains for biodiversity.

Para 174 (NPPF) is a criteria-based policy mostly addressed through the North Northamptonshire Joint Core Strategy. However, there is a local context to the policy approach too with respect to the natural assets located within Kettering Borough. The policy stipulates that to protect and enhance biodiversity and geodiversity, plans should identify, map and safeguard components of local wildlife-rich habitats and wider ecological networks; promote the conservation, restoration and enhancement of priority habitats and the protection and recovery of priority species; and identify and pursue opportunities for securing measurable net gains for biodiversity

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Section 16 (NPPF) seeks to conserve and enhance the historic environment. Para 184 establishes that heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

Para 185 (NPPF) is a criteria-based policy determining that plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. The criteria make reference to sustaining, enhancing and using heritage assets. Accounting for the wider benefits that conservation can bring. New development making a positive contribution to local character and distinctiveness and drawing on the contribution the historic environment provides to the character of a place.

Para 187 (NPPF) states that local planning authorities should maintain or have access to a historic environment record which should contain up to date evidence about the historic environment in their area. This should be used to assess the significance and contribution such assets make to their environment and predict the likelihood of discovering unidentified assets in the future

Para 197 (NPPF) notes that the effect of an application on the significance of a non-designated asset should be taken into account. A balanced judgement will be required as to the scale of harm or loss and the significance of the asset.

Para 200 (NPPF) says that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of assets to enhance or better reveal their significance.

Summary of officer comments

The Pre-submission Plan will be subject to a full check and challenge review to ensure correct formatting and consistency of wording between policies

Flood Risk 7.1

- The SFRA is being updated. The update for the SWMP has been completed. Both documents will be used to inform the final site selection in the Pre-submission Plan
- The JCS requires developers to demonstrate how schemes are informed by local studies including SFRAs, SWMP and the LFRMS and, where applicable, be designed to a higher standard of protection.
- All sites have been subject to sequential testing for flood risk in accordance with Policy 5 in the JCS.
- The requirement of a drainage assessment is managed through the development management process. However, to ensure developers have due regard for the Flood Toolkit and the Local Standards and Guidance for Surface Water Drainage at an early stage they will be required through the FRSWM policy to demonstrate how their proposal has had due regard to these obligations.
- The requirement of a site specific flood risk assessment is set out as part of the planning application process and applies to all types and sizes of development. Given this

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requirement it could be argued that there is no point in reiterating the need for an FRA in the development policies. However, it has been agreed that where a flood risk has been identified the need for a FRA should be highlighted as an explicit policy requirement to provide clarity for both the determining officer and the developer.

- The FRMS indicates that flood risk management will need to combine traditional flood defences with more accurate flood warning and mitigation measures to incorporate the idea of resilience and resistance. Policy 5 of the JCS seeks to reduce the risk of flooding. A policy in the SSP2 will enable a more localised approach for the Borough of Kettering.
- The relationship between flood risk and sustainable water management with heritage assets is considered tenuous, unlike the connection between heritage assets and GI. Having examined the purpose of the flood risk and sustainable water sections it is not deemed appropriate to include reference to heritage assets within this topic. It will be emphasised in green infrastructure and within its own right.

Question 4 (Flood Risk & Sustainable Water Management)

- Developing a locally specific policy on FRSWM in the SSP2 will provide a local direction which will help developers align their proposals and / or contributions with Kettering specific project priorities. The policy and supporting text will align with the NPPF and be prepared in the context of the JCS Policy.
- Instead of the new policy for FRSWM setting out site or scheme specific projects for delivery the preferred policy approach will be one that signposts strategies and action plans like the SWMP and the GIDP which include a variety of projects across the Borough. Making strategies and / or action plans the reference point for the policy is logical as it is less restrictive, applicable across a wider range of projects for developers to respond to and enables the continuous development of project opportunities as others are delivered.
- The supporting text on FRM will require developers to demonstrate how their schemes are informed by the Flood Toolkit and the Local Standards and Guidance for Surface Water Drainage in Northamptonshire. These tools are not mentioned in the JCS but having due regard to them is an expectation from the LLFA. Encouraging early citation will support the development management process.
- The JCS makes no reference of the need for major development to prepare a drainage strategy in line with the LLFA requirements. This provision will be set out in the supporting text and / or policy during the redrafting of the SSP2.
- Policy 5 of the JCS requires development (irrespective of size / type) to be designed from the outset to incorporate SuDS. Therefore it is unnecessary for the SSP2 to reiterate this requirement.
- No provision is made within the JCS for retrofitting SuDS which could, as part of a package of FRM projects, contribute to and harness more resilience. This provision will be set out in the supporting text and / or policy during the redrafting of the SSP2.
- The requirement of developer contributions to compensate or mitigate a developments impact must be directly relevant to that proposed development
- Where a CEMP is required it is usual practice for KBC to impose a condition on a planning permission. Given this requirement it could be argued that there is no point in reiterating the

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need for a CEMP in the development policies. However, where the need for a CEMP is identified in a site specific policy it will be highlighted as a requirement to provide clarity for both the determining officer and the developer.

Biodiversity

- Policy 4 on Biodiversity and Geodiversity within the JCS sets out the principal of refusing development where significant harm cannot be avoided, mitigated or compensated. It is not necessary to repeat this provision in the SSP2 unless with respect to setting the context of more locally specific assets. For example, the River Ise and Meadows SSSI, MG4 Grassland alongside the River Ise and within Tailby Meadow Local Nature Reserve, Slade Brook and Southfield Farm March SSSI may benefit from specific policy wording or made reference to in the contextual text as these are locally specific assets that could warrant special mention. This will be discussed during the next phase of Plan development.
- Given that Kettering falls within the Nene Valley Nature Improvement Area, has assets including SSSIs, a Local Nature Reserve, Pocket Parks, Local and Potential Wildlife Sites and areas of Best and Most Versatile [agricultural] Land there is merit in seeking to strengthen the biodiversity element of the SSP2 during the next phase of Plan development.

Green Infrastructure

- The table in para 7.3 references Scheduled Ancient Monuments as part of GI. However, there is an opportunity through the text in this section to emphasise the contribution green infrastructure can make towards the protection, conservation, enhancement and management of historic landscapes, archaeological and built heritage assets and their settings irrespective of whether such assets are designated or non-designated. This will be addressed in the next phase of Plan development for the SSP2.
- The Council's approach to the protection, conservation, enhancement and management of heritage assets and their settings is two-fold. The GDP determines the Local Level Green Infrastructure Corridors and identifies project opportunities within those corridors to enhance existing and create new GI across the Borough. In addition the Council has a site specific approach to allocating individual historically and visually important open spaces in SSP2. These have been assessed and identified in the Historically and Visually Important Open Space Background Paper (2015).

This two fold approach had been considered to be sufficient to ensure that heritage assets would be protected, conserved, enhanced and managed as it is widely recognised that such assets are integral to GI. Where assets fall out of the GI network they are captured as a Historically and Visually Important Local Green Space.

However, the Council now acknowledges that the GDP adopts an implicit approach where an explicit approach would provide a clearer message of the commitment to protect and enhance the historic environment and assets within. As a consequence the sections relating to GI and Local Green Space will be reviewed to ensure the supporting text and policy are more explicit in their regard to the historic landscape and assets within.

- The Twywell Hills and Dales are not included in the Borough level GI corridors as the reserve is located in East Northamptonshire.
- It is to be noted that there are no proposed sites identified for Mawsley in this section. However, Figure 7.1 (Borough Level GI Corridors) does identify a project which is included in the North Northamptonshire Green Infrastructure Delivery Plan (2014). The Council is

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currently updating the open space audit and needs assessment so it may be that with the revision that this project is no longer deemed a need. However, in response to this representation, the provision of open space as a community amenity is not generally deemed to be “unsuitable and out of keeping with the spirit and aesthetic of a village setting”.

GI, open space and allotment policy suggestions

- The policy wording and supporting text with regard to GI will be improved to provide clarity on a number of points in the next phase of Plan development. As part of this process regard will be given to the historic landscape and assets within. The aim is to make the relationship between GI and the historic landscape more explicit and demonstrate the Council’s commitment towards the protection, enhancement and management of the historic landscape.
- Policy ENV01 stipulates that the GI corridors will be protected and enhanced and that development should not compromise the integrity of the corridors or the wider GI network. As heritage assets are considered part of the GI network the policy wording is understood to provide protection to the heritage assets as well as the natural environment.
- There are already defined policy approaches for each level of GI corridor. These are set out in the JCS and the SSP2 respectively. It may be useful to highlight this fact in the SSP2 supporting text to provide clarity.
- JCS Policy 15 is about strengthening connectivity within and around settlements. It makes reference to extending the existing GI network into new developments and therefore begins to recognise the role GI has in being part of the neighbourhood and local transport network. The GI policy seeks, albeit implicitly, to improve the sustainable transport routes which form part of the wider transport network at both a neighbourhood and local level. A simple revision to the supporting text of the GI policy will emphasise this ambition more explicitly and provide a locally specific approach supporting the JCS Policy 15.
- The Council have recently commissioned the development of an Open Space Strategy, Playing Pitch Strategy and Sports Facilities Strategy. These strategies will provide the basis for policy development on the protection and enhancement of existing and creation of new open spaces and sport and recreation provision. This will include allotments and historically and visually important local green spaces.
- Policy 2 of the JCS should provide sufficient protection for the historic environment in the context of allotments and therefore amending the allotments policy to repeat the provision of Policy 2 is not deemed necessary.
- The SSP2 will be updated to refer to the allotments planned at Desborough Green Space.

Heritage

- It is recognised that the current approach is implicit with regard to heritage assets rather than explicit. There will be a review of the supporting text and policy wording for both ENV01 and ENV03 to determine how these can be refined to strengthen the Council’s approach towards the conservation, protection and enhancement of historic landscapes. Once this exercise is complete it will be possible to review the revised policies alongside Policy 6 from the JCS to determine if there are any further policy needs with respect to heritage.

ENV03 (Local Green Space)

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- The Historically and Visually Important Open Space Background Paper (2015) sets out the rationale for progressing HVI069 (Desborough) as a Historically and Visually Important Local Green Space the principle of which is supported in the Historically and Visually Important Open Space Background Paper Update (2016).

HVI069 is located on the west edge of Desborough opposite a residential settlement and is therefore in close proximity to the community it serves. The historic significance of the ridge and furrow in an area where much of this landscape feature has been lost makes it a demonstrably special space to the local community. It is not an extensive tract of land and is local in character. Having met the tests set out in the NPPF and it is not contrary to the national Planning Practice Guidance it can be concluded that this site is appropriate to be progressed as a Historically and Visually Important Open Space.

Next steps

- Section 7 - Amend formatting to align duplicated paragraph numbers
- Ensure final site selection in SSP2 is informed by the latest version (2018) of the SFRA and SWMP
- When developing the FRSWM policy the preferred approach will be to provide a policy hook to key documents such as the SWMP and the GIDP. These identify projects and set out a strategic approach to FRSWM. The policy is also likely to identify projects of significance e.g. improvements to the Slade Brook Urban Corridor
- The Council will encourage the nomination and development of additional projects during the two yearly reviews of the GIDP. The next review is scheduled in 2020 following the adoption of the SSP2
- Review approaches to flood risk management in the major development policies. This will eradicate any inconsistencies. Where flooding is identified as a risk there will be a policy requirement to carry out a FRA
- Update major development policies to ensure they have been informed by the SFRA, SWMP and GIDP (as appropriate)
- Policy KE/184a will be updated to include the requirement of a CEMP
- The supporting text for FRSWM policy will require developers to review and subsequently demonstrate how they have had due regard for the Flood Toolkit and the Local Standards and Guidance for Surface Water Drainage in the context of any relevant development proposal
- The FRSWM will specify in both the text and policy that where the opportunity arises SuDS should be retrofitted whenever possible as part of new development
- Determine a policy approach and develop supporting text with respect to biodiversity within Chapter 7 to strengthen the biodiversity focus and reflect locally specific assets
- Ensure that the supporting text and where appropriate policy wording relating to ENV01 and ENV03 is strengthened. The aim is to make sure our approach towards the protection, conservation, enhancement and management of historic landscapes, archaeological and

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built heritage assets and their settings (irrespective of whether such assets are designated or non-designated) is explicit and intentional

- Upon completion of the review to Policies ENV01 and ENV03 (to strengthen the approach to heritage) determine whether there is a need for a locally specific heritage policy to supplement ENV01, ENV03 and JCS Policy 2
- The supporting text and policy wording for ENV01 will be reviewed and amended accordingly to advise that detrimental impacts on undesignated heritage assets or landscapes during project delivery will be avoided
- To remove ambiguity and provide clarity on when developer contributions are required the supporting text and policy wording relating to GI and open space, sport and recreation will be reviewed and amended. It will establish that contributions will be sought (where appropriate) from major development as defined by the NPPF.
- Include wording in the supporting text for GI to highlight that the policy approach for the Sub-regional and Local GI Corridors is set out in the JCS where the SSP2 sets out policy for the Borough Level GI Corridors.
- Revise the supporting text for GI to emphasise the role it has in the development of sustainable transport routes which will build on JCS Policy 15 (connecting towns, villages and neighbourhoods)
- When developing the policy for open space, sport and recreational facilities the preferred approach will be to provide a policy hook to key documents such as the and the GDP, OSS, PPS and SFS.