

Anglian Water

As previously raised in representations made on Policy GA11, the NPPF states that policies for managing development within a Local Green Space (LGS) should be consistent with those for Green Belts.

The neighbourhood plan should, therefore, clarify that managing development within a LGS is to be consistent with national policy on the Green Belt – “Policies for managing development within a Local Green Space should be consistent with those for Green Belts.” The NPPF, further sets out criteria regarding the types of development that may be appropriate in Green Belt areas.

Policy GA11 should not introduce a more restrictive approach to development proposals and, therefore, be amended accordingly to reflect the NPPF. See Court of Appeal case R on the Application of Lochailort Investments Limited v Mendip District Council. Case Number: C1/2020/0812.

This approach would be consistent with the approach taken in other neighbourhood plans, most recently the High Leicestershire Neighbourhood Development Plan Examiner Report (Harborough District) – made November 2024 as follows:

“Policies for managing development within a Local Green Space should be consistent with those for Green Belts.” The part of the Framework that relates to ‘Protecting Green Belt land,’ including paragraphs 152 to 156, sets out statements regarding the types of development that are not inappropriate in Green Belt areas. I have recommended a modification in line with the request of Anglian Water so that it is clear the policy does not seek to introduce a more restrictive approach to development proposals than apply in Green Belt without sufficient justification, which it may not (R on the Application of Lochailort Investments Limited v Mendip District Council. Case Number: C1/2020/0812).”

Policy GA11 designates the Addingtons playing field area as an area of LGS and that development is restricted to very special circumstances.

The response made by the Neighbourhood Plan Group to our previous representation is that "Part 17 of the Second Schedule of the General

Permitted Development Order allows water companies (among others) to carry out certain works without having to make a planning application. These permitted development rights are not affected by the Local Green Space designation."

To clarify, not all works that may be required would necessarily be permitted development (PD) and it can be the case where a utility company will need to make a formal planning application to the local planning authority.

At present, the policy wording is potentially setting a more restrictive approach to development proposals than apply in Green Belt without sufficient justification which national policy does not allow and has been clarified in the Courts. The policy should be amended to provide the correct policy basis for decision-making if any future development was proposed on LGS.

Northamptonshire Police, Daventry Station

More needs to be done to comply with the elements of designing out crime required by Policy 8 of the North Northamptonshire Joint Core Strategy which requires new developments to e) Ensure quality of life and safer and healthier communities by (amongst others): iv. Seeking to design out antisocial behaviour and crime and reduce the fear of crime through the creation of safe environments that benefit from natural surveillance, defensible spaces and other security measures having regard to the principles of the 'Secured by Design';

Local Authorities are duty bound to adhere to Section 17 of the Crime and Disorder Act 1998 (as amended), having due regard to the likely effect of their functions on crime and disorder, doing all they reasonably can to prevent it.