



**NAPTON ON THE HILL
PARISH COUNCIL**

3rd October 2016

Local Plan Consultation
Development Strategy
Growth and Investment Services
Rugby Borough Council
Evreux Way
Rugby
CV21 2RR

Dear Sir/Madam,

Rugby Borough Council – Publication Draft of the Local Plan

I write as the clerk to Napton Parish Council and on behalf of Napton Parish Council. The Parish Council believes the Publication Draft of the Local Plan may not have been prepared in accordance with public law because Rugby Borough Council voted to proceed to the Publication Draft without having first considered the responses made to its first consultation. However in this response we wish to concentrate on why we believe policy DS10 is unsound.

Napton Parish Council believes that Policy DS10 is unsound as:

- (a) The proposed Local Plan is not justified. A reasonable [and better] alternative which has not been considered by the Local Planning Authority is accelerating the development of the Rugby Radio Masts site and thus avoiding the need to bring forward new development proposals in the countryside; and
- (b) The proposed Local Plan breaches many of the precepts set out in the National Planning Policy Framework (NPPF) including but not limited to:
 - (i) Paragraph 37 of the NPPF which aims to minimize unnecessary car journeys by providing for a balance of land use within an area. A so-called “garden village” at Lodge Farm will have few employment opportunities for its residents and will lack a secondary school. Consequently many unnecessary car trips will be generated contributing to climate change;
 - (ii) Paragraph 58 of the NPPF which aims to preserve the existing character and sense of place of communities. A so called “garden village” at Lodge Farm will destroy the rural nature of its surroundings; and

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- (iii) Paragraph 109 of the NPPF which aims to protect and enhance valued landscapes. Napton, values its prospect to the north over the mainly undeveloped Leam Valley and strongly opposes urbanization in this area.

The Publication Draft of the Local Plan should be improved by withdrawing policy DS10 and making the necessary consequence changes to policy DS3 etc.

Yours faithfully,

Jayne Warman - Clerk