

## Representation Form for Local Plans



### Local Plan Publication Stage Representation Form

Ref:

(For  
official  
use only)

Name of the Local Plan to which  
this representation relates:

Rugby Borough Council Proposed  
Submission Local Plan

Please return to Rugby Borough Council by 5:00pm Friday 13<sup>th</sup> March 2026  
By email to: [localplan@rugby.gov.uk](mailto:localplan@rugby.gov.uk) by post to: Development Strategy, Town  
Hall, Evreux Way, Rugby, CV21 2RR

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each  
representation you wish to make.

### Part A

1. Personal  
Details\*

2. Agent's Details (if  
applicable)

*\*If an agent is appointed, please complete only the Title, Name and Organisation boxes below (if  
applicable) but complete the full contact details of the agent in 2.*

Title	Mrs	
First Name	Rebecca	
Last Name	Hardy	
Job Title (where relevant)		
Organisation (where relevant)		
Address Line 1		
Line 2		
Line 3		
Line 4		
Post Code		
Telephone Number		
E-mail Address (where relevant)		

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	Climate CL2 Renewable energy and low carbon technology	Policies Map	Yes
Site ID	<input type="text"/>				

4. Do you consider the Local Plan:

(1) is Legally compliant

No

(2) is Sound

No

(3) complies with the  
Duty to co-operate

No

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

Policy CL2 is not legally compliant because it fails to meet statutory plan-making requirements under the Town and Country Planning (Local Planning) (England) Regulations 2012 and the Planning and Compulsory Purchase Act 2004:

- The plan includes a broad area on a map for wind turbines but does not specify the number of turbines, minimum separation distances from homes, or clear siting criteria.
- This fails to meet NPPF Paragraphs 158–168, which require local plans to identify suitable areas for renewable energy development with clarity and evidence.
- There is insufficient evidence that proposed turbine sites, particularly near Redrow homes, are compatible with residential amenity, health, safety, and landscape sensitivity.
- Consultation responses highlighting impacts on residential properties and sensitive landscapes have not been satisfactorily addressed, meaning the policy fails the legal requirement for transparent, evidence-based plan-making.

Policy CL2 is unsound because it fails the NPPF tests for soundness:

- **Positively Prepared:** The policy does not demonstrate that renewable energy needs are met while avoiding harm to residents and valued landscapes.
- **Justified:** There is no robust evidence showing that turbine locations, particularly near homes or sensitive landscapes, are appropriate or mitigated.
- **Effective:** The policy lacks clear decision-making criteria and safeguards, risking inconsistent application and legal challenge.
- **Consistent with National Policy:** The policy does not comply with NPPF Paragraph 174 (protection of valued landscapes), Paragraph 185 (residential amenity), or Planning Practice Guidance on renewable energy, as it fails to define suitable areas or demonstrate mitigation of impacts.

Policy CL2 raises concerns regarding the Council's compliance with the Duty to Cooperate under Section 33A of the Planning and Compulsory Purchase Act 2004.

The plan does not demonstrate that the Council engaged constructively with neighbouring authorities or statutory bodies regarding cross-boundary impacts of wind turbines on landscape, visual amenity, and residential communities.

Without evidence of such strategic engagement or agreement, the Local Plan may fail the DtC requirement, as cumulative or cross-boundary impacts on neighbouring areas have not been properly addressed.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

- Clearly define and map suitable areas for wind turbine development, supported by robust landscape, visual, and residential amenity assessments.
- Relocate proposed turbine sites away from existing homes (Redrow developments) and new/planned communities, including Houlton, to avoid adverse impacts.
- Specify number of turbines, minimum separation distances from homes, and siting criteria to provide clarity and protect communities.
- Include explicit safeguards for residential amenity, health, and sensitive landscapes.
- Demonstrate how consultation responses, community objections, and engagement with neighbouring authorities have been considered and incorporated.

(Continue on a separate sheet /expand box if necessary)

**Please note:** In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

I wish to participate in the hearing sessions because I am directly affected by proposed wind turbine locations near my home and new communities, including Houlton. I wish to present evidence on legal compliance, plan soundness, residential amenity, landscape impact, and Duty to Cooperate concerns, which will assist the Inspector in making a fully informed decision.

All representations received will be submitted to the Planning Inspectorate alongside the Proposed Submission Local Plan and published on the council's website. Personal addresses and email addresses (as distinct from businesses addresses), but not names, will be redacted before representations are published.

The Rugby Borough Council Privacy Notice for Development Strategy is available here:

<https://www.rugby.gov.uk/w/privacy#development-strategy>

The Planning Inspectorate's privacy notice can be accessed here:

<https://www.gov.uk/government/publications/planning-inspectorate-privacy-notices>