

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 13th March 2026

By email to: 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	<input type="text"/>	<input type="text"/>
First Name	<input type="text" value="Tom"/>	<input type="text"/>
Last Name	<input type="text" value="Longworth"/>	<input type="text"/>
Job Title (where relevant)	<input type="text"/>	<input type="text"/>
Organisation (where relevant)	<input type="text"/>	<input type="text"/>
Address Line 1		<input type="text"/>
Line 2		<input type="text"/>
Line 3		<input type="text"/>
Line 4		<input type="text"/>
Post Code		<input type="text"/>
Telephone Number	<input type="text"/>	<input type="text"/>
E-mail Address (where relevant)	<input type="text"/>	<input type="text"/>

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?

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

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.

<p>Do you consider the Local Plan is legally compliant? I am concerned that the Sustainability Appraisal accompanying Policy CL2 does not adequately assess the "cumulative impact" of placing industrial-scale wind turbines in an area that has already been heavily developed with housing and warehouses.</p> <p>If the site is a "valued landscape" under NPPF Paragraph 180, the plan fails to demonstrate how it is legally protecting the natural environment as required by the Framework.</p> <p>Do you consider the Local Plan is sound?</p>
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Policy CL2 is not the most appropriate strategy for this site. Given the substantial recent development of warehouses and housing, this remaining green space is vital for local character. Placing turbines here creates an over-dominant industrial landscape that the evidence base fails to justify.

The NPPF requires planning policies to "contribute to and enhance the natural and local environment." Policy CL2 does the opposite here; it threatens biodiversity and visual amenity in an area already under pressure. It fails to strike the balance required by Section 15 to protect the "intrinsic character and beauty of the countryside."

Do you consider the Local Plan complies with the Duty to co-operate?

The Duty to Co-operate requires councils to work together on "strategic matters" that cross-boundary lines. Wind turbines, due to their height and visual prominence, have a significant impact on the landscape and views of neighboring authorities.

There is little evidence in the Plan that the Council has sufficiently engaged with neighboring boroughs to assess how the turbines in Policy CL2 - when added to the existing warehouses and housing - affect the shared regional landscape character. Without this cross-boundary visual impact assessment, the Duty to Co-operate has not been fully satisfied.

(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.

Spatial Clarity: Explicitly map "suitable areas" for wind development that are strictly relocated away from existing and planned residential communities, specifically Houlton.

Specific Criteria: Define clear siting criteria, including the maximum number of turbines allowed in a single area and mandatory minimum separation distances from homes.

Protection of Amenity: Include a dedicated clause requiring developers to prove there will be no adverse impact on residential health, noise levels, or visual amenity.

Cumulative Assessment: Require a specific assessment of the "cumulative impact" of turbines when viewed alongside existing large-scale warehousing and housing.

(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 to explain why Policy CL2 is not 'sound' or 'justified' in its current form. My local area has already been heavily developed with housing and warehouses. I need to provide the Inspector with direct evidence on the cumulative impact these turbines will have on our remaining green space, which I believe fails the environmental protections required by NPPF Section 15.

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

9. If you have used AI to produce or substantially alter your representation, please declare which tool you have used, how it was used, and what checks you have undertaken to ensure the AI-produced material is accurate.

Gemini, have cross referenced both the local plan and the National Planning Policy Framework.

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-notice>