

## 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	Carmen	
Last Name	Nicholson	
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  Policy  Policies Map

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.

I am writing to formally object to the proposed wind turbine development in the fields between Houlton and Clifton.

My primary concern relates to the impact on the natural environment, particularly protected and sensitive wildlife species that currently inhabit and use this landscape.

This area supports a range of birdlife, including birds of prey and owls. These species use the open fields as hunting grounds and flight corridors. The proposed turbine locations appear to sit directly within established flight paths. The installation of large-scale turbines in this location presents a significant collision risk, particularly for:

- Birds of prey (e.g. buzzards, kestrels)
- Owls, which fly at rotor height during hunting, especially at dusk and dawn

Owls are particularly vulnerable to turbine strikes due to their low, silent flight patterns and focus on ground prey rather than obstacles.

In addition to direct collision risk, the development would:

- Disrupt established hunting territories
- Fragment habitat
- Increase disturbance from construction and maintenance activity
- Potentially reduce local biodiversity

This proposal appears to conflict with Section 15 of the National Planning Policy Framework (NPPF), which emphasises conserving and enhancing the natural environment. Paragraphs within Section 15 state that planning decisions should:

- Protect and enhance valued landscapes
- Minimise impacts on biodiversity
- Prevent significant harm to ecological networks
- Refuse development resulting in the loss or deterioration of irreplaceable habitats

The cumulative impact of intensive wind farm development between Houlton and Clifton risks degrading a functioning ecological landscape that currently supports protected species. Renewable energy development is important; however, it must not come at the expense of protected wildlife and biodiversity, particularly where policy explicitly requires conservation and enhancement of the natural environment.

NA

(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.

Renewable energy development is important; however, it must not come at the expense of protected wildlife and biodiversity, particularly where policy explicitly requires conservation and enhancement of the natural environment.

For these reasons, I urge the planning authority to reconsider the proposed siting of these turbines.

NA

(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)?

No, I do not 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:

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>