

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	Mr	
First Name	Chi Ho	
Last Name	Tse	
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?

Local Plan Paragraph	3.1	Local Plan Policy	Climate CL2 Renewable energy and low carbon technology	Policies Map	Yes
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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.

I strongly object to the proposed Local Plan, as I consider it to be unsound, not legally compliant, and failing the duty to co-operate, specifically regarding the identification of land near Houlton for potential wind energy development.

(1) The Plan is NOT SOUND (Unjustified and Ineffective):

The evidence base underpinning the 'Renewable Energy Potential' map is deeply flawed. It fundamentally fails to account for the current scale, density, and ongoing rapid expansion of the Houlton strategic residential allocation. Designating land on the immediate fringes of a major new community as 'suitable' for industrial-scale wind turbines creates an undeniable land-use conflict.

(2) The Plan is NOT SOUND (Inconsistent with National Policy):

The National Planning Policy Framework (NPPF) explicitly requires planning policies to create places with a high standard of amenity for existing and future users. Imposing wind farm development zones right on the doorstep of the Borough's primary residential growth area directly contradicts this national directive by prioritizing infrastructure over the health, wellbeing, and living conditions of thousands of residents.

(3) Failure in Legal Compliance and Duty to Co-operate:

The process of identifying these specific parcels of land has not transparently assessed the cumulative impact on the local infrastructure and community of Houlton. There appears to be a stark failure to coordinate the Borough's housing growth strategy with its climate strategy, resulting in a contradictory plan that builds a community only to industrialize its immediate borders. The consultation has failed to adequately inform or protect the residents most directly impacted by this specific map overlay.

For these reasons, the plan is unsound and the 'suitable areas' for wind energy surrounding Houlton must be completely removed from the Policies Map.

(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.

To make the Local Plan sound (specifically Justified, Effective, and Consistent with National Policy), the following modification is non-negotiable and mandatory:

1. Immediate Removal from Policies Map:

The 'Renewable Energy Potential / Wind Energy Suitable Areas' overlay must be modified to completely remove and de-designate all land parcels within, adjacent to, or in the immediate setting of the Houlton strategic residential allocation.

2. Why this is the only modification that makes the plan sound:

Justification: There is no evidence-based justification for placing an industrial wind-energy search area within the immediate vicinity of the Borough's primary residential growth point. The two land uses are fundamentally incompatible.

Effectiveness: No amount of policy "safeguarding" wording can effectively mitigate the loss of residential amenity, the visual industrialization of the Houlton landscape, and the resulting decline in the quality of life for thousands of residents. The only effective solution is the total removal of these sites from the plan.

National Policy: The NPPF requires the protection of residential amenity. Keeping these areas on the map creates a "presumption in favor" of development that will lead to protracted legal and planning battles. To be consistent with national policy on sustainable communities, these areas must be deleted in their entirety to provide certainty to the Houlton community.

Conclusion: I am not seeking "better" policy wording or safeguards; I am seeking the total deletion of these specific areas from the Wind Energy suitability mapping.

(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)?

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:

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.

I have used Gemini to help structure my response and ensure the use of correct planning terminology relevant to the Regulation 19 stage. I have used the tool to translate my personal concerns regarding the impact on Houlton into the formal 'Soundness' framework required for this consultation. I have personally reviewed and edited all text produced to ensure it accurately reflects my firm opposition to the proposed wind energy sites and that all factual details regarding my local area are correct.

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>