



LOCAL ACCESS FORUM

Coventry City Council and E.ON
The Council House
Earl Street
COVENTRY CV1 5RR

08 September 2025

SEC Newgate UK on behalf of Coventry City Council and E.ON

This Consultation Response constitutes formal advice from The Warwickshire Solihull and Coventry Local Access Forum. Coventry City Council is required, in accordance with section 94(5) of the Countryside and Rights of Way Act 2000, to have regard to relevant advice from this forum in carrying out its functions.

Reference: Land South East of Shilton Lane Coventry
Application for solar farm development, including solar arrays, control buildings and associated infrastructure, internal access roads, landscaping and associated development.

We have previously exercised our statutory function to advise Coventry City Council to **REFUSE** the above proposal, for all of the reasons as stated in our letter dated 30 November 2023.

Relevant advice includes maintenance of public access to land for the purposes of open-air recreation and the enjoyment of the area, and as to such other matters as may be prescribed.

Public rights of way include lanes, roads and highways as well as public footpaths and bridleways etc.

Land also includes buildings and other structures, land covered with water and any estate, interest, easement, servitude or right in or over land. We also take regard to the needs of land management and desirability of conserving the natural beauty of the area for which it is established including the flora, fauna and geological and physiological features of the area.

‘Having regard’ to our advice, means Coventry City Council are legally required to take it into account in carrying out their functions.

Similarly, we also advised Rugby Borough Council to REFUSE the above proposal in a letter dated 01 February 2024 for the reasons stated within.

We attach copies of those two formal advisory letters for your ongoing information.

We do not believe anything has changed which affects the weighty material planning considerations the CCC Planning Committee took into consideration, as the landowner, landlord and decision maker when **REFUSING** application PL/2023/000106/FULM - Decision Notice dated 21 March 2024.

Weighty Material Planning Considerations are the reasons for continuing to advise **REFUSAL** remain Weighty Material Planning Considerations backed up by the NPPF Policy (Dec. 2024) and Local Plan Policy.

The three reasons for **REFUSAL** in 2024 were and are paraphrased as follows:

1. The proposal represents inappropriate development within the Green Belt and results in harm to the openness of the Green Belt and Very Special Circumstances have not been demonstrated. The cumulative impacts of the harms identified have not been overcome. The proposal is contrary to the aims of the Coventry Local Plan Policy and the NPPF.

The Revised December 2024 NPPF also takes into account Green Belt best and most versatile agricultural land in UK food production. The land at Lenton's Lane Farm is Grade A land in FULL UK food production, farming livestock and cereals.

Conserving and enhancing the natural environment (NPPF 15) is also given added prominence with an expectation of keeping parcels of Green Belt land open and permanent to prevent the cumulative negative impacts of development and urban sprawl from destroying the irreplaceable ecosystems, ecology and biodiversity this land supports.

The land at the centre of the proposal, forms valuable parcels of productive Green Belt agricultural land with a boundary onto a narrow lane bordered with privately owned residential properties. Existing residents enjoy the general and mental health benefits from access to ancient public footpaths and the ecosystems, ecology and biodiversity the land supports. The importance of preserving the above site is incalculable as the cumulative negative impacts of indiscriminate financially speculative developments in the area continue to increase exponentially.

2 The proposed development, by reason of siting, overall size, proximity of the proposed structures and buildings to existing residential properties, the associated infrastructure and increased intensity of use would lead to unacceptable loss of residential amenity due to loss of outlook for the residents of Lenton's Lane, resulting in an unacceptable degree of urbanisation. The proposal is, therefore, contrary to NPPF and Local Plan Policy.

While a minor reduction in the size of the solar farm is now proposed it will do little or nothing to mitigate the cumulative negative visual impacts, the outlook from the homes, of existing and future residents of Lenton's Lane. Neither will it mitigate the adverse visual impact and proximity of the proposed structures, buildings and infrastructure to adjacent residential properties.

The increased intensity of use and increase in commercial traffic on a narrow residential lane is an unacceptable and preventable highway safety issue. The health and wellbeing of local residents is being put under unwanted and unwelcome pressure. Additional disruption, noise, glint and glare from the solar panels, and the risks from undeclared safety issues posed by the electrical infrastructure has not been openly and transparently declared or addressed.

Finally, the ugly intrusive security fencing, lighting and CCTV will only add to the already admitted unacceptable and increased degree of urbanisation.

3 *The impact of the proposal will result in significant personal hardship to the existing tenant farmer, who would lose his livelihood as a direct result.*

Coventry City Council's actions and lack of duty of care towards their long-term tenant farmer has already taken a toll with significant and ongoing personal hardship, stress and loss of wellbeing.

We understand Coventry City Council are the applicant, the landowner and the landlord of Lenton's Lane Farm how, therefore, have they proactively continued to work with themselves, as the applicant, to secure developments that improve the economic, social and environmental conditions of the area?

Something which is patently open to question.

- On what premise is the 'partnership' with E.ON based?
- Is a legally binding 'partnership' forming contract between E.ON and Coventry City Council already in place?
- Does Coventry City Council remain the 'applicant', landowner and landlord of the land: Who is the 'OUR' and 'We' in the quote below?

*'Your feedback will be used to refine **OUR** plans before **WE** submit planning applications to Coventry City Council and Rugby Borough Council?'*

- Does E.ON already have a legally binding financial stake in the major proposed solar development on land at Lenton's Lane Farm?
- Does all of the above demonstrate an unreconcilable conflict of interest which will adversely affect an open and transparent democratic planning decision making due process and determination being reached?

Very special circumstances have not been demonstrated in the past and we believe cannot successfully be demonstrated in any future planning application on this Green Belt productive agricultural site on best and most versatile land in UK food production.

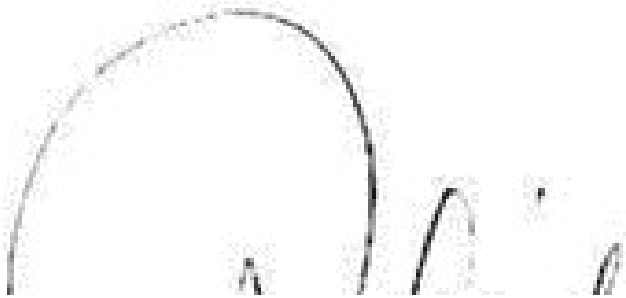
We believe there remain too many unanswered questions which need addressing prior to submission of any planning applications by Coventry City Council and Rugby Borough Council.

We respectfully suggested a further public, face to face, consultation meeting should be organised in September 2025 after the end of the holiday period to give **ALL** local residents and the wider community a chance of attending. We are disappointed our request appears to have been ignored.

We were disappointed when attending the consultation in the Church Hall, Lenton's Lane on Saturday 12 July 2025, by the lack of detailed information available and informed operatives present who could answer detailed questions.

We request a confirmation of receipt of this advisory consultation response from the Warwickshire Solihull and Coventry Local Access Forum. We look forward to receiving answers to the important questions asked.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Sheila Cooper', with a large, sweeping arch over the first part of the name.

Sheila Cooper

Acting Chair Warwickshire Solihull and Coventry Local Access Forum

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