



LOCAL ACCESS FORUM

Longford Ward Councillors:

Cllr. Lindsley Harvard
Cllr. George Duggins
Cllr. Linda Bigham

Henley Ward Councillors:

Cllr. Ed Ruane
Cllr Pat Seaman
Cllr. Kevin Maton

Rugby Borough Council: Revel and Binley Wood

Cllr. Tony Gillias
Cllr. Belinda Garcia
Cllr. Heather Timms

07 December 2025

Dear Councillors

Reference Planning Applications: CCC: PL/2025/0001922 and RBC: R/25/0883 **Lentons Lane Solar Farm Aldermans Green Coventry CV2 1NZ**

The Warwickshire Solihull and Coventry Local Access Forum have thought long and hard about contacting you as the Ward Councillors of the areas of Coventry directly affected by the above applications. We appreciate and thank you for calling-in the applications which means they will, at least, be determined on the public platform of Planning Committee Meetings. You can be assured the decision to contact you directly has not been taken lightly. We have found it impossible to obtain answers to any of the issues described in our objections. We objected formally and addressed the Planning Committee in 2024 when the application was REFUSED. Nothing has materially changed since then.

We remain deeply concerned by the lack of definitive information in the re-submitted documents and technical drawings which show no meaningful changes which outweigh the weighty material planning considerations which resulted in the decision to REFUSE the application in 2024.

We are also disappointed to find that our formal OBJECTIONS, as a Statutory Advisory Body, have not been published on either of the planning portals. We would appreciate it if you could intervene, on our behalf, to ensure the omission is urgently remedied.

This letter constitutes formal advice from the Warwickshire Solihull and Coventry Local Access Forum. Coventry City Council and Rugby Borough Council are 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.

Forums will often advise on matters where public access is just one of a number of considerations, and perhaps not the most important consideration.

ACCESS is an important consideration but, in this case, it is not the only important consideration. There are also other vitally important considerations which result in an unacceptable cumulative negative impact on the daily lives and health, safety and wellbeing of locally affected residents and, the tenant farmer.

Due to additional material concerns associated with the above application we decided that direct contact with local Ward Councillors with direct responsibility for the affected residents of Longford and Henley Wards and in Rugby Wards, Revel and Binley Woods was essential.

We welcome and appreciate the Calling-In of both re-submitted planning applications **PL/2025/0001922 and R/25/0883** for determination on the public platform of Planning Committee Meetings.

Substantial weight to any harm to the Green Belt including harm to its openness should be given by local planning authorities. Inappropriate development is, by definition, harmful to the Green Belt and should NOT be approved except in very special or exceptional circumstances.

No such Exceptional or Special Circumstances were demonstrated in 2024 and have NOT been demonstrated at re-submission, in 2025.

REFUSAL of the previous application was decided on weighty material planning considerations. At re-submission nothing has materially changed which outweighs the potential harm to the Green Belt, by reason of inappropriateness. The productive agricultural, best and most versatile, Green Belt (BMV) land at Lentons Lane Farm has long produced cereals and meat for the UK market from some of the last remaining irreplaceable open productive parcels of Green Belt farmland in the area.

We repeat: No exceptional or special circumstances were previously demonstrated and no exceptional or very special circumstances have been demonstrated within the resubmitted application.

Too many unanswered questions, serious omissions, anomalies and inaccuracies remain in the supporting documents, and technical drawings, attached to the application. The continuing lack of open and transparent definitive information outweighs all other considerations.

The loss of irreplaceable Green Belt (BMV) agricultural land in UK food production satisfies the fundamental aim of NPPF Policy which is to protect and preserve the openness and permanence of Green Belt agricultural land in UK food production. The land at Lentons Lane Farm also prevents further urban sprawl in an area where urbanisation and erosion of the Green Belt is all too obvious. Lentons Lane Farm and its ancient public rights of way, two of which the application fails to acknowledge, exist and were mapped and recorded in the 19th century and form part of a much-used beneficial recreational access for local residents.

The land also supports some of the last remaining rare, 'ridge and furrow' fields in the area and other hidden archaeological features which have not been appropriately considered in reports. Other possible unexplored problematic features include, old colliery workings, capped mine shafts, mining subsidence, flooding and the farm being in a 'high risk' area for unexploded military ordnance.

The farmer has been a tenant of Coventry City Council for circa 60 years, however, Coventry City Council as the landowner, landlord and decision-maker have treated the tenant shamefully during the previous application, after refusal and now during re-submission.

The tenant farmer, as a material stakeholder, has the right to formally object to the planning application on legitimate planning grounds; he has, however, inexplicably not objected and has also ceased contact with local friends and neighbours all of whom previously offered help and support during an, unexpected, unwelcome, stressful and life-changing episode of his life. The loss of farming, as a way of life, and the loss of the animals a dedicated farmer looks after every day, is irreconcilable.

We repeat Coventry City Council have treated their tenant shamefully and without any understanding of the impact and toll their actions have taken and continue to take.

We believe the position Coventry City Council have placed their tenant, and his loss of livelihood in, should be considered a Weighty Material Planning Consideration in the decision-making process. We quote Lord Scarman and precedence, in our formal OBJECTIONS.

Copies of our Objections to both Councils, **PL/2025/0001922 and R25/0883**, are attached for your information in which we describe, in detail, the Weighty Material Planning Considerations which we believe should be grounds for REFUSAL of the application for a second time.

Coventry City Council as the landowner, landlord and decision maker demonstrates a clear potential for bias and/or pre-determination due to the serious pecuniary conflicts of interest which clearly exists from the significant financially vested commercial interest in the development's success and absolute need to secure approval. A non-pecuniary conflict of interest also exists for the planning authority which should remain impartial when determining any application.

While the LPA can technically evaluate applications on merit in the usual way, for an application on land it owns with the complications of the roles described above, there is an undeniable perception of bias and possibility for predetermination as the Council stands to gain significant financial returns from the solar farm and possibly, in other ways, within its partnership with E.ON which is not available to them from agricultural use.

Also lacking openness and transparency are important details on the future ownership of the land. Will it be retained as a Council asset or will another tenancy agreement be entered into and with whom. Will capital from any land sale be wisely invested or income from any new tenancy agreement, including profits from the partnership with E. ON, be used for the future benefit of Coventry City Council taxpayers? The potential for future financial losses from asset stripping and poor decision-making should also be considered.

Planning applications must be decided impartially and in the public interest, by considering material planning considerations including NPPF policy on the cumulative loss of Green Belt, productive agricultural land (BMV) in UK food production and the cumulative negative impact of increased urbanisation.

The significant financial interest within the partnership with E.ON makes it impossible to demonstrate impartiality. E.ON are questionably described as the applicant making it impossible to separate the Energy Company from Coventry City Council as the landowner, landlord and decision-maker.

The 'inexplicable' change to Coventry City Council's requirement from 5 objections to 15 needed to trigger determination of this application by the Planning Committee, on the public platform, only added to our disquiet when taking into account all of the above.

Our research has also failed to provide open and transparent information on the partnership with E.ON and the ongoing financial role.

Coventry City Council Committee Meetings, many in place to scrutinise decision-making, begin with resolutions, on certain 'agenda items', to exclude the public and press; with subsequent published minutes redacted. Redacted minutes are intentionally useless in providing definitive information. There appears to be an institutional failure to recognise the importance of openness and transparency, within the decision-making processes, on decisions which directly affects the public purse and, therefore, vital services for Coventry City Council's taxpayers.

- Scrutiny Co-ordination Committee -30 October 2025
- Shareholder Committee - 04 November 2025

The Report (appendix 1 - Strategic Energy Partnership Performance Review) questionably described as NOT a key decision was presented with NO background papers, was considered by Scrutiny but, it appeared, NOT by any other Council Committee, Advisory Panel or other Council body.

The Report also stated, specifically, it would NOT go to Council.

The Company records for UK Battery Industrialisation Centre Ltd show Coventry City Council as the **ultimate controlling party**. The costly failure of the GIGA Factory proposal and ongoing serious questions and anomalies that emerge from the publicly accessible company records leads to serious questions on the Council's business acumen, and in commercial decision making.

The 'partnership' arrangements with E.ON , in relation to the Lentons Lane solar farm proposal, lack openness and transparency. There is clearly a major financial component to the ongoing partnership which only serves to highlight concerns surrounding the exclusion of the public and press during meetings of the Shareholder Committee described as the '*formal governance body*'.

The partnership is described as a Joint Venture Agreement between the Council and E.ON UK PLC. It appears E.ON initially funded the development of the overall Coventry Energy Plan with a data-driven approach, funded by the partner, informing the planning and selection of future projects. In the case of the application above E.ON is described as the applicant with CCC, as the Planning Authority, the landowner, landlord and the decision-maker.

The undeclared serious conflict of pecuniary interest exists as does the potential for bias and predetermination in the decision-making process. In this case, it is not merely enough for members to state, at the beginning of the planning meeting, that, as yet, they have not made up their minds.

NO formal, open and transparent legal governance process or financial scrutiny exists without publication of UNREDACTED reports and MINUTES. If 'reports' to Cabinet and FULL Council are also not open and transparent the already serious Conflicts of Interest, cannot be appropriately managed.

Any joint commercial venture through a partnership between a Local Authority and a large energy company, where the ultimate success of the proposal is necessarily based on a pre-determined planning decision for approval, is unreliable. A joint venture which has already created an unequivocal serious pecuniary conflict of interest is unsound.

Within the commercially based partnership between the Council and E.ON where cash has

already changed hands and creation of profit is clearly an expectation, how can an impartial and unbiased planning decision be an expectation? The Council's financial interests are undeniably embedded in the unequivocal need for the proposed solar development and its partnership with E.ON to be financially successful to enable it to fulfil its prime responsibility and financial commitment to the taxpayers of Coventry.

How, therefore, can the Council's irrefutable serious pecuniary conflict of interest, combined with the Planning Authority's non-pecuniary conflict of interest, be reconciled against the undeniable reality of perceived bias, predetermination and the need for total impartiality in the decision-making process?

Both bias and predetermination in planning decision-making are unlawful.

Coventry City Council as the land owner, landlord and decision-maker has an undeniable serious conflict of pecuniary interest and has shown an overwhelming intent to obtain planning approval at any cost.

Inaccurate supporting documents containing serious anomalies and omissions, the inability, or unwillingness, to provide basic and accurate information during public consultations, a failure to satisfy the statutory requirements for public notification and a failure to respond to communications requiring answers, all compound to produce an unsound application. No lessons were learnt from the previous outcome.

This demonstrates an unwelcome 'state' of mind, cognitive planning bias, a recognised phenomenon where risks, costs, time and repercussions, of a proposal, are underestimated while simultaneously overestimating the benefits.

Worse, is strategic misrepresentation which deliberately underestimates the long-term financial cost and associated personal costs resulting from an attempt to secure approval of an unsound project.

Nothing has materially changed with supporting documents from 2023/24 republished and continuing to contain omissions, anomalies and inaccuracies on major issues fundamental to the daily lives and health, safety and wellbeing of local residents and wider local communities.

The Council's treatment of the tenant farmer has been shameful. His livelihood and farming life, as he knew it, has been wilfully destroyed. We suspect there is a hidden story waiting to be told.

Open and Transparent Definitive information does not exist. The application remains an unwelcome and unwanted financially speculative concept project.

Apparent bias exists if any fair-minded and informed observer immediately recognises and concludes a 'real possibility' of bias exists. The evidence above confirms Actual Bias undoubtedly exists.

Resubmission of the above application was delayed by the Council's tardy decision-making process on whether or not to appeal their own Planning Committee's decision to REFUSE. We continue to believe Coventry City Council continues to demonstrate institutional led bias embedded within the planning due process demonstrated by an overwhelming intent to gain approval for application PL/2025/0001922 using whatever means possible. They have expanded existing views by continuing over-reliance on out of date and inaccurate 2023/24 reports, unintelligible technical drawings, omitted information and false assurances.

Supporting documents were inaccurate and unacceptable in 2023/24 and remain inaccurate and

unacceptable today.

The reasons for REFUSAL in 2024 remain the same with the Weighty Material Planning Considerations we relied on previously, still valid today. In his leading speech in the House of Lords in the 1985 case of *Great Portland Estates v Westminster City Council*, Lord Scarman clarified that a tenant's personal circumstances can be considered a Material Consideration.

In delivering the judgement of the House, Lord Scarman said and we quote:

“Personal circumstances of an occupier, personal hardship, the difficulties of businesses which are of value to the character of a community are not to be ignored in the administration of planning control. It would be inhuman pedantry to exclude from the control of development the human factor. It can, however, and sometimes should be given direct effect as an exceptional or special circumstance. The test, therefore, of what is a ‘material consideration’ in the preparation of plans or in the control of development, is whether it serves a planning purpose, and a planning purpose is one which relates to the character of the use of land”.

Lord Scarman, therefore, established that personal circumstances, including the financial impact of loss of livelihood, are capable of being a ‘material considerations’ in planning law, stating that the ‘human factor’ can be given ‘direct effect’ in exceptional circumstances.

The Council's shameful treatment of their long-term tenant farmer and unwanted loss of his long-term farm tenancy and livelihood should be unequivocally established as a Weighty Material Planning Consideration in the 2025 decision-making process.

Even if individuals within the Council act in good faith, the perception of bias and, or predetermination during planning due process can be enough to compromise the legal standing of the decision-making process. The circumstances surrounding this and the previously REFUSED application makes it highly susceptible to legal challenge by ALL objectors, including local residents, groups, interested parties, organisations and the tenant farmer.

A pecuniary conflict of interest relates to a potential for financial profit or loss. In this case the Local Authority stands to gain financially via rent or a share of the profits from the energy company partnership but ONLY if the solar farm proposal is approved. This creates a clear financial incentive that could influence the planning decision which clearly confirms the definition of a serious conflict of pecuniary interest and the potential for a non-pecuniary interest within the planning decision-making process.

Our decision to write directly to you all as local Ward Councillors was not taken lightly and a decision finally influenced by the publication, on the planning portal, on 01 December 2025, 16 NEW important documents and drawings, long after the public consultation period had ended.

While understanding this practice is not unlawful per se, the planning authority has a legal duty to be fair and reasonable. The additional documents are varied, long, complicated and technical. All current and previous OBJECTORS and other interested parties should be awarded an additional and reasonable length consultation period in which to research, cross reference, ask for clarification of new issues and be given time to ask questions and have them answered. For instance, some of the important technical drawings are presented in such a way which makes them incomprehensible and site unidentifiable.

Many objectors are not planning professionals or technical experts and, therefore, require adequate time to digest the contents against previous information. The technical drawings continue to fail to give definitive details on the numbers and positioning of the, potentially problematic inverters which are variously quoted as numbering between 6 and 13. Omissions

and confusions also exist on the major issues surrounding the positioning of the substantial groundworks required to transfer electricity by cable from the 'cross-border' solar panels to the National Grid connection off Alderman's Green Road. The considerable distance and groundworks required alongside the canal and its public access towpath to Alderman's Green, has already been questioned and objected to.

The NEW information also fails to include formal definitive confirmation on whether or not a connection to the National Grid is formally and necessarily certificated, without which, the solar farm is a commercially unviable project. Certification confirming connection to the National Grid is absolutely vital to prove the project will not later be identified as a 'zombie project' and to prove, without reasonable doubt, that the National Grid has adequate capacity for the Lentons Lane Solar Farm to be certified as having a direct connection into the Grid on completion. Given the numbers of solar farms in the area already constructed and or approved and under construction, we question if all these solar farms have unequivocally obtained formal certification for direct connection to the National Grid?

We believe the addition of this quantity of NEW documents to what is already a contentious application is unacceptable and significant enough to warrant Coventry City Council providing a further fair and reasonable period of consultation for affected residents, members of the public and other interested parties who have already objected. It would NOT be fair or reasonable to disadvantage objectors by not agreeing to an additional and significant length consultation to enable appropriate scrutiny of the large volume and complexity of the NEW published information, some of which continue to lack veracity.

Councils have a duty to publicise planning applications and we believe this duty includes NEW documents submitted after the original consultation period has ended and especially when they include information considered a material planning consideration in the decision-making process.

The Warwickshire Solihull and Coventry Local Access Forum wish to bring all of the above to your urgent attention in this, necessarily complicated, formal advisory letter. We thank and appreciate both Coventry and Rugby local Councillors for calling-in the applications to ensure, at the very least, determination will take place on the public platform of your individual Planning Committee Meetings.

Finally, the rumoured scheduled date for the planning committee meeting is 18 December 2025 which falls immediately prior to Coventry City Council closing its doors for the extended Christmas and New Year break, not re-opening until 05 January 2026.

We believe that official notices containing information for the planning meeting including details on requesting to speak, should arrive in the post no later than Thursday 11 December 2025. Bearing in mind current unwelcome postal delays, non-delivery and inevitable delays caused by additional Christmas mail, how is Coventry City Council going to successfully fulfil its required statutory notification duty to ALL objectors? It is not enough to merely place official notification notices in the post knowing it is more than likely they will not be delivered in time to fulfil the Council's statutory duty.

We believe there is a very strong case to be made for rescheduling the Planning Committee Meeting until sometime in the New Year to ensure the Council's statutory duties can be appropriately fulfilled.

The Warwickshire Solihull and Coventry Local Access Forum will seek to speak before both Planning Committees to ask for the application to be REFUSED for all the weighty material planning considerations referred to above.

We respectfully request an acknowledgement of receipt of this letter including details of any actions you are able to take on behalf of your long suffering, adversely affected, local residents

Kind regards

A handwritten signature in cursive script that reads "Sheila Cooper". The signature is written in dark ink and is positioned above a horizontal line that extends to the right.

Sheila Cooper

Acting Chair of the Warwickshire Solihull and Coventry Local Access Forum

Please Respond Directly to: sheila.ann.cooper41@gmail.com

Please Copy to Acting LAF Secretary: shailchohan@warwickshire.gov.uk