

# LOCAL ACCESS FORUM

**Mr Liam D'Onofrio -Case Officer**

Development Management  
Coventry City Council PO Box 7097  
The Council House  
COVENTRY CV6 9SL

27 October 2025

Dear Mr D'Onofrio

**Ref: PL/2025/0001922/FULM**

Lentons Lane Solar Farm, Lentons Lane, Aldermans Green, Coventry CV2 1NZ  
Solar Farm Development including solar arrays, control buildings and associated infrastructure, internal access roads including landscaping and associated development.

*This letter of OBJECTION to application PL/2025/0001922/FULM 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 role, duty and function.*

Further to our letter dated 08 September 2025 we wish to present the following additional and weighty reasons for the application to be **REFUSED**.

The application continues to rely on many of the out of date reports published for the previous application and with many supporting documents, including technical drawings, for the resubmission continuing to lack openness and transparency. They fail to answer important questions and contain anomalies, omissions and concerning inaccuracies.

The Young Planning and Energy Statement which includes design and access, is one such document.

In particular, the reference to National Grid capacity and availability of connection (page 1 1.5) is questionable given the Government's changes in policy relating to queuing of financially speculative applications (zombie applications) waiting for access to the National Grid. Reform of the entire process is imminent and intended to reduce waiting times.

Due to the urgent need for National Grid infrastructure upgrades we doubt if capacity is available for the large numbers of solar energy facilities already approved in the immediate Lentons Lane and wider area? We do not believe there is capacity, at the proposed Aldermans Green EDF battery storage facility, for connection to the National Grid. The planning statement consistently states (18 times) that connection to the National Grid is available and is a weighty consideration in favour of a proposal that has close proximity to a grid connection with capacity. Therefore, capacity aligned with deliverability, etc. etc. However at 7.5 on pages 32/33 the statement says and we quote:

*'Planning Conditions could require, prior to commencement of construction, confirmation of a grid connection'.*

The list of the possible conditions listed may require more information before construction commences as they are extensive and confirm a lack of openness and transparency within the various reports. There is, disappointingly, a lack of definitive information available.

On (page 2 1.13) a statement refers to the applicant's aspirational commitment to delivering CCC's ambitions in identifying an appropriate site and a development proposal appropriate to its surroundings. This statement is not only contentious but offensive given the land is an irreplaceable parcel of productive Green Belt agricultural land in full UK food production. The land is Grade 3a and 3b and has produced high yield crops, sheep and beef cattle for the UK market for many decades.

We have been led to believe Eon is the applicant but were not named as such on the planning portal where details on the applicant are attached to the application. Coventry City Council is the landowner, landlord and, as the Planning Authority, will determine the decision.

Definitive answers on the true relationship between CCC and EON are hard to come by but it would be naive to dismiss speculative financial incentives as the main driving force behind this application. CCC has a poor business record in relation to sustainable energy as demonstrated by the huge losses to the public purse by the council's failure to bring forward the GIGA factory project.

**The Preliminary risk assessment** has flagged several hazards with respect to 'compressible deposits' on site including 'moderate' ground instability( page 13 3.3.3)

**Mining sites and mining** (page 13 3.4 - Pell Frischmann) identifies part of the site in a high risk area, with parts of Area A lying within a Coal Authority 'Development High Risk Area' with two collieries identified with associated past underground mining on or near the site, seven mine shafts onsite and an additional seven mine shafts in proximity to the site.

Wyken Colliery is recorded both on and offsite.

Mine Shafts: Five shafts shown in Area A1 - One shafts in Area A2 - One shaft on the south-eastern boundary of Area B and a shaft in Area 1 was capped in January 1989.

### **Flood Risk.**

The flood risk maps indicate that there is a high risk from surface water flooding in parts of the site. ( Pell Frischmann - page 20 3.6.4 Figure 11)

**Figure 11** indicates that all of Area A and most of Area B is in an area for limited groundwater flooding to occur. However, with the increase in intensive weather events due to the Climate Change, an increase in intensity of flooding events is highly likely.

### **Unexploded Bomb Risk Map - Zeticauxo**

Much of the proposed site is within a High Risk Area indicated as having a bombing density of 50 bombs per 1000 acres.

### **Public Rights of Way:**

There are three public rights of way which cross the proposed site. The two ancient mapped rights of way cross the centre of the site with one connecting with the second at a right angle which originates from Lentons Lane. The third passes the farmhouse down a track from Lentons Lane and eventually crosses the canal and the motorway and onto Wyken Slough.

There is little, if any information, on these much used footpaths within the planning statement. These ancient footpaths are used and enjoyed by local residents for recreational health benefits.

It is against the law to block, obstruct or divert any public right of way.

## **Inverters and Containers.**

The design drawing, of the proposed site, presented at the consultation and which also appears as a preface in the Planning Statement failed to give details of the positioning of the '*13 Inverter containers to be spaced evenly throughout the site*' - This quote is from the EON Indicative Inverter Container drawing dated 20 June 2025.

We are deeply concerned by the lack of openness and transparency and failure to provide definitive information on where the 13 Inverter containers will be positioned. The Inverters, housed in ugly industrial sized containers, are likely to be noisy and spatially and cumulatively intrusive. The wilful omission of vitally important and potentially negatively impacting and adversely affecting repercussions is unacceptable and, we believe, breaches planning law.

Conflicting information on the Inverters in the Preliminary Pell Frischmann Risk Assessment (Figure 2 page 2) and the EON drawing, referred to above, appears to be a deliberate attempt to confuse and prevent vital information from the negatively affected residents of Lentons Lane and other interested parties including the long-term tenant farmer.

There is an almost total lack of technical information on the cabling and its connection into the battery storage facility owned by EDF on a site off Alderman's Green Road. Disruption to land alongside the canal and on local roads and highways during the connection process remains an unwelcome mystery.

The failure to provide definitive information on many technical issues and the possible repercussions for the affected residents and local community is, we believe, another breach of planning law which should be urgently addressed. Coventry City Council owes their affected residents and taxpayers intellectual respect and a duty of care which has not, so far, been forthcoming.

## **Notifications:**

CCC, yet again, failed to appropriately inform and provide affected residents and other interested parties and organisations with timely legal notification of the resubmitted application. Some letters were received dated 07 October 2025, others dribbled in after complaints were made. The lamppost notifications were dated 10 October 2025 and the legally required notification in the media was sometime later.

As a result you are dealing with a conflicting deadline of the 21 day consultation period which CCC will have to legally honour. Inexplicably, Rugby Borough Council only published application **Ref: R25/0883** to the planning portal on 22 October 2025 with a deadline for comments 10 November 2025.

Timely Notifications are a legal requirement of planning law.

## **The three Reasons for REFUSAL - Decision Notice dated 21 March 2024**

We do not believe anything has changed which affects the weighty material planning considerations that the Coventry City Council Planning Committee decided warranted a decision of **REFUSAL of application PL/2023/000106/FULM** detailed in the Decision Notice published 21 March 2024.

We, therefore, respectfully remind the CCC Planning Committee of those 3 reasons for REFUSAL and paraphrase below:

- 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 the importance of conserving Green Belt best and most versatile agricultural land for UK food production. Producing food near to local UK markets is far more carbon friendly than importing by air or bringing it in by road from the EU and Ireland.

The unequal balance of taking Green Belt agricultural land out of UK food production for the development of solar energy against the huge carbon footprint of importation of food from afar, is an intellectual and scientific no brainer. Permeable agricultural land in UK food production, helps with the prevention of flooding due to increasingly intensive weather events caused by climate change. In addition, the valuable, irreplaceable land and crops also sequester carbon.

Conserving and enhancing the natural environment (NPPF 15) is also given added prominence with the 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 ever diminishing, irreplaceable ecosystems, ecology and biodiversity that Lenton Lane Farm supports. The rich and diverse habitats support a wide range of wildlife species with the land providing connections to and between other important local areas and diverse groups of animals to enable them to successfully breed and thrive.

Preservation of a diversity of species for the enjoyment of future generations is also vital for human survival. The general and mental health benefits from recreational access to ancient public rights of way, natural environments and the ecosystems, ecology and biodiversity the land supports, is incalculable.

The cumulative negative impacts from ill-thought out financially speculative development which will destroy one of the last remaining parcels of open agricultural Green Belt land in UK food production in Coventry, is unconscionable.

The proposal is unviable in sustainable energy terms and unviable against the huge benefits that will be lost from producing food for UK markets and from carbon sequestration which helps to achieve Net Zero.

- 2. The proposed development, by reason of siting, overall size, proximity of the proposed structures and building 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 Lane resulting in an unacceptable degree of urbanisation. The proposal is, therefore, contrary to NPPF and Local Plan Policy.*

While a very minor reduction in area of the solar farm (still totalling 44,000 panels and associated infrastructure) is proposed it will do little or nothing to mitigate the cumulative negative impact on the amenity of local affected residents. The close proximity of the proposed solar panel structures, including the 13 industrial sized inverters, buildings, internal roads and infrastructure including 'prison-like' industrial fencing, lighting and CCTV cameras, cannot be mitigated. The unwanted loss of an open outlook for the affected local residents and the huge impact on the local and wider natural environment is unwanted and unwelcome.

The increased intensity of use and increase in commercial traffic on a narrow residential lane, necessarily used for parking, is an unacceptable and preventable highway safety issue.

The general health and mental wellbeing of local residents is being put under unwanted and unwelcome pressure exacerbated by concerns that the site will also draw in the 'undesirable' visitors and a real risk of theft from the site which is already a local hazard. Fly tipping will also be an increased risk on an unmanned site where access tracks will have been widened and made more vehicle and user friendly. There have already been incidents on the Rugby portion of the site where encampments of caravans have invaded the Sowe Common via the tracks where it is now proposed to gain access into the site. The commercialisation of the agricultural Green Belt site brings with it unwelcome issues for local residents and which will require constant security and policing.

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.

The ugly and intrusive industrial security fencing, lighting and CCTV surveillance will only add to the already admitted increased degree of urbanisation on productive agricultural Green Belt land in UK food production.

**Fire Protection Department** - Service HQ, Warwick Street, CV32 5LH

***The consultation response from the Warwickshire Fire and Rescue Service, while offering no objection, it is subject to the following criteria being met as required by Approved Document B, Volume 2, Requirement B5 - Access and Facilities for the Fire Service.***

- Minimum width of the access road 3.7 metres along the entire length
- Minimum width of any gateways 3.1 metres
- Minimum height clearance 3.7 metres
- Minimum carrying capacity is 12.5 tonnes
- A fire appliance to gain access to within 45 metres of all points within the footprint of each building or in accordance with table 15.1 of ADB, Volume 2
- Every elevation to which vehicle access is provided should have a door, a minimum of 750mm wide, to give access into the building. The maximum distance between doors, or between a door and the end elevation, is 60m.
- Dead-end access routes longer than 20m require turning facilities
- Turning circles should be a minimum of 16.8 m between kerbs or 19.2 between walls.

They are also drawing the applicant's attention to the need for the development to comply with Approved Document B, volume 2, Section B5 - Access and Facilities for the Fire Service. Full details including the positioning of access roads relative to buildings, the arrangement of turning circles and hammer heads etc. regarding this can be found at:

[www.warwickshire.gov.uk/fireguidance-commercialdomesticplanning](http://www.warwickshire.gov.uk/fireguidance-commercialdomesticplanning)

and The Warwickshire County Council Guide 2022 - Transport and Roads for Developments, Section 3 (para. 3.13) Emergency Vehicles.

We have not seen any reference to full compliance, with the above essential requirements, in the supporting documents.

We understand the access tracks are extremely narrow with tight bends to negotiate. The canal bridge crossing is ancient and unlikely to be suitable for heavily loaded, oversized and wide HGV construction traffic including low-loaders and the carrying capacity of Fire Service vehicles.

**Neither do we believe we have seen, within the supporting documents, any reference to a consultation response from the Canal and River trust and other negatively affected organisations.**

As with our advice on Public Rights of Way, the Warwickshire Fire and Rescue Authority have asked the developer to ensure that access to the site, during construction and once completed, is maintained free from obstructions such as parked vehicles, at all times, to allow Emergency Service Vehicles access.

Does the applicant propose taking the advice of the Warwickshire Fire and Rescue Authority to fit a Sprinkler Installation in accordance with the relevant clauses of BS EN 12845 : 2004, associated Technical Bulletins, and or to the relevant clauses of British Standards 9251 : 2014 for residential premises?

**Access/Egress Arrangements for HGV Construction Traffic and other development related traffic:**

Lentons Lane is a narrow residential lane necessarily congested with parked private cars. The day to day lives of the affected residents will be negatively disrupted by HGV construction traffic if the application is approved. It is, therefore, essential that, in that event, moratoriums are put in place against heavy construction traffic accessing and egressing the local lanes and roads around the proposed site during the morning and afternoon rush hours and during both morning and afternoon school runs. Hours of working should also be restricted to Saturday mornings and NOT on Sundays.

The safety and wellbeing of all road users and especially local children must be protected at all costs by application of robust informative and mandatory Planning Conditions applied to any determination to approve.

The local access routes including those from the M6 Motorway, Coventry City Centre and the A46 are already dangerously congested, with narrow lanes and dangerous bottleneck junctions through local villages, controlled by traffic lights.

The unsafe bridge in Anstey, reduced to a single narrow carriageway with traffic light control, has no deadline for when the bridge will be repaired and reopened. It is virtually unpassable to heavy and oversized HGV traffic.

Lentons Lane is unsuitable, throughout its length, for HGV construction traffic and especially in the area of the Cemetery.

The position of routes for cabling associated with the entire project and availability of connection to the National Grid via the EDF battery storage facility (which is no longer detailed) remains of deep concern and largely a mystery.

There is NO definitive information available on any of the above issues and matters. Determination based on fact and reality is not possible without definitive open and transparent dialogue and publication of sound supporting documents.

At present the Planning Statement and other supporting documents, referred to above, bear little resemblance to reality or fact and, therefore, totally lack veracity.

**Decision Note 3 from 2024:**

- 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, of circa 60+ years, has been unfair, concerning and has taken an unwelcome toll including personal hardship and loss of wellbeing.

We respectfully remind Coventry City Council of the following:

**Possessions include, land, houses, objects, licences, LEASES, money, persons and certain types of welfare benefits. A public authority cannot take away your property, or place restrictions on its use without very good reason.**

We quote from the Institute of Human Rights:

**Protocol 1, Article 1: Protection of property.**

**Every natural or legal person is entitled to the peaceful enjoyment of his possessions. No one shall be deprived of his possessions except in the public interest and subject to the conditions provided for by law and by the general principles of international law.**

**The preceding provisions shall not, however, in any way impair the right of the State to enforce such laws as it deems necessary to control the use of property in accordance with the general interest or to secure payment of taxes or other contributions or penalties.**

Example case - Howard v United Kingdom [1987]

**A public authority wanted to use a compulsory purchase order to acquire a property for development. The European Court of Human Rights held that the question was whether the authority had struck a fair balance between the rights of the individual property owners and the rights of the community. One of the main factors in any such balance will be the availability of compensation reflecting the value of the property acquired by the authority.**

Coventry City Council as the landowner, landlord and decision maker have, since the 2024 application REFUSED by their own Planning Committee, maintained an unacceptable and unwelcome level of pressure on the farmer which has resulted in loss of livelihood including farming stock. Farming is a way of life and Coventry City Council, by failing in its duty of care, have taken away both the tenants' peace of mind and livelihood in his later years.

The 'Young' Planning Statement includes misquotes and misinterpretation of the judgement in the 1985 Case: Great Portland Estates v Westminster Council from the speech Lord Scarman made in the House of Lords relating to material considerations.

**In his leading speech Lord Scarman clarified that a tenant's personal circumstances can be considered a material consideration.**

In reaching this decision, Lord Scarman, who delivered the judgment of the House, 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".**

**Successfully farming productive Green Belt high-yield agricultural land for UK food production and breeding pedigree farm animals over 6+ decades undeniably**

**relates to the character and use of land satisfying both the 'direct effect' and 'material consideration' tests which should unequivocally be given 'direct effect' as an Exceptional or Special Circumstance.**

The principle of material considerations has been further supported by later cases that also emphasise the importance of personal circumstances in the overall balance of planning judgement.

Exceptional or Special Circumstances should, therefore, be Heavily Weighted in favour of **REFUSAL** of Coventry City Council's application:

**Ref: PL/2025/0001922/FULM**

Lentons Lane Solar Farm, Lentons Lane, Aldermans Green, Coventry CV2 1NZ  
Solar Farm Development including solar arrays, control buildings and associated infrastructure, internal access roads including landscaping and associated development.

The lack of duty of care towards a tenant farmer of circa 60+ years, by Coventry City Council, clearly demonstrates a failure to take into consideration the tenant's personal circumstances, personal hardship and the negative effects their unwelcome actions are having on the farm, as a livelihood and business, and on the health and wellbeing of the tenant farmer; the Council have systematically discounted the tenant's personal day to day and financial circumstances which should clearly be considered as a Material Planning Consideration when determining **REFUSAL** of the above application.

The Warwickshire Solihull and Coventry Local Access Forum previously advised **REFUSAL** of the previous application in our letter dated 30 November 2023. The content and advice in that letter remain relevant today.

We wish to remind the CCC Planning Committee that land includes building and other structures, land covered with water and any estate, interest and 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 physiographical features of the area.

'Having regard' to our advice, means Coventry City Council and its Planning Committee, are legally required to take it into account in carrying out its functions.

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.

Very special circumstances have not been demonstrated in relation to obtaining planning approval for this application on productive Green Belt agricultural land in full UK food production. In addition, the considerable losses to the public purse since 2023 caused by CCC continuing to pursue a purely financially speculative application with no merit, at the expense of the livelihood and wellbeing of the long-term tenant farmer is deeply concerning.

We believe there remain too many unanswered questions, anomalies, inaccuracies and omissions relating to the application where planning policy and precedent is misrepresented, manipulated and misinterpreted in an attempt to present the proposal in a good light which, sadly, does not bear scrutiny or represent reality.

We advise and recommend that the Coventry City Council Planning Committee **REFUSE** application **PL/2025/0001922/FULM** for all of the WEIGHTY PLANNING considerations as referenced above.

We request a confirmation of receipt of this **OBJECTION** and ask that the Warwickshire Solihull and Coventry Local Access Forum will be legally notified of when the application will be brought before the CCC Planning Committee for determination. We also advise that we will be applying to speak before the Planning Committee to seek **REFUSAL** of the application.

Yours sincerely

A handwritten signature in black ink that reads "Sheila Cooper". The signature is fluid and cursive, with "Sheila" on the top line and "Cooper" on the bottom line, connected by a flourish. A short horizontal line extends from the end of the "o" in "Cooper".

**Sheila Cooper**

Acting Chair of the Warwickshire Solihull and Coventry Local Access Forum

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