Planning Committee: 11 January 2022
Observations received following the publication of the agenda

Item W/21/1370 – Coventry Airport

Additional consultation responses received

Below is a summary of the additional consultation responses received since the publication of the committee report. Planning Committee members should refer to the website for full details of the responses received.

25 Public Objections:

Local area: 6

Outside of local area: 18

Unknown address: 1

- Health and safety concerns – risk of explosions.
- Battery manufacture is dangerous and would involve bulk transportation of dangerous chemicals in close proximity to highly populated areas.
- Site is located within the Green Belt.
- Contrary to the Local Plan.
- Historic site that should be preserved.
- Battery technology is constantly evolving and this building, along with the plant and machinery will take time to construct – what will the building produce when built?
- There are Government Strategies which support aviation and include need to keep airfields open for training enough pilots.
- Speculative development, with no identified commercial interest behind the battery gigafactory proposal; if outline development permission is granted in principle but the gigafactory not subsequently developed, that will potentially expose the airport site to other, as yet unspecified, development paths.
- There is no imperative to build on a scarce resource and the building could be built nearby, thus gaining benefits from both facilities.
- Will result in closure of businesses and loss of jobs.
- Closure of the airport will affect the local area and many customers across the country.
- The airport is in excellent condition and offers extremely good facilities for many different trades.
- The site is not disused as portrayed by the applicants.
- Loss of pilot training facilities at the airport; soon we will be left with little to no adequate training facilities and the country will be left without any commercial pilots.
- Proposal driven by financial gain.
- Detrimental impact on the aviation industry.

- Coventry is a vital and strategic airport, its role of providing training, employment and meeting needs of local people is crucial.
- The airport forms part of the invaluable networks of airfields required in the UK to stay at the forefront of aviation worldwide.
- Airfield has potential for cargo operations and local business travel.
- Coventry Airport could become a pioneer in the Urban Air Mobility market business.
- There is land nearby land granted for JLR and taken out of the Green Belt which would be suitable for the proposed development, being nearer road infrastructure. The land is currently barren and an eyesore. This would allow the airport to be retained.
- Lack of substantial business case for factory of this size in the UK, let alone in Coventry.
- There are alternative sites available.
- The agent's response to comments made by the Civil Aviation Authority's Advisory Team appears to be an attempt to discredit the objector, rather than to address the substantive issues raised by that objection.
- The publication date of the committee agenda was underhand. Concerns regarding consultation period and timeline for comments.
- WDC were a named supporter on a press release from the applicant regarding the proposed development which is being considered by WDC.
- The developers will probably 'BAIT AND SWITCH' this site into housing: no battery factory and recycling, no permanent jobs, just more housing.
- The lack of IAPs (instrument approach facilities) at Coventry is already a substantial inhibition on its use; this inhibition is entirely at the discretion of the applicant. Thus to argue that there are alternatives available is fallacious, based on the applicant's current mode of operation of the airport, which includes the bizarre lack of opening on a Monday - a substantial inhibition to its full commercial use, and the unavailability of its IAPs. The Council should be considering what alternatives there are to the full facility which Coventry represents. The only comparable one is Birmingham, which is not a realistic one, together with the extremely unlikely scenario that the aviation business currently based at Coventry could move to Birmingham.
- The agent's response to comments from the All Party Parliamentary Group (APPG) on General Aviation notes that none of the officers of the group live in the area of Coventry Airport, implying that their residence is relevant to the objection. However, the domicile of an objector is not relevant to the validity of the objection, indeed the desire to preserve a transport hub for the Coventry area, and beyond, should be welcomed by those interested in the economy of the region. Since the APPG exists to support the use of non-scheduled aviation for a wide variety of purposes, it is disingenuous to suggest that the domicile of the officers of the APPG is in any way relevant to the validity of their objection.
- The airport forms a big part of Coventry.
- Electric vehicles do not solve climate change concerns and are not a long-term solution.
- Questions whether the site is served by sufficient electricity supply and that there has been no interest from Tesla in the site.

- Approving the development could set a harmful precedent.
- Proposed job numbers are totally speculative and would equally be provided by development of another site.
- The independent review of the applicant's very special circumstances case failed to engage with any of the businesses, parish councils or communities impacted by the development which provides a bias narrative.
- Warwick District Council are not without sufficient independence or governance to determine the subject application.

Chair of the Westwood Heath Residents Association (WHRA): Objection:

- In earlier documentation, the presence of the A46SLR (strategic link road) was not seen to have had a mitigating effect on transport issues arising from the Gigafactory development, but in the latest version of the committee report it is stated that it will have a mitigation effect, but with no justification or numerical analysis.
- The A46SLR consultation document from January 2021 demonstrates that with the modelling current at the time, there are several pinch points where traffic queues would increase rather than decrease. This modelling did not take account of other potential developments such as Balsall Common in the Solihull Plan, nor was there any allowance for Gigafactory traffic.
- We believe that it not valid to add further justification for the A46SLR into the Gigafactory case, without a further detailed traffic assessment.
- In addition to increased traffic flows at commuting times, there is the potential for HGV traffic to use these local roads inappropriately.
- Loss of aviation facility at a time when the General Aviation Strategy in the UK is to maintain the network of airfields. Loss of aviation sector employment.
- The increase in potential employment is fluid, having gone up from 4000 to 6000 jobs - but in an industry which would have to be highly automated to be competitive it is not clear how this can be justified.
- The submission focuses on the case for the battery industry in the UK rather than specifically this site. There is a lack of transparency around what alternatives were considered given that this site is an active airfield. The scale of the development appears to have been chosen to match the runway size rather than the business need.
- The business case rests on proximity to automotive development, but on the other hand also justifies the relatively high scale on non-automotive uses. It also does not identify an anchor client for the scheme. This weakens the overall impact of the case.

Coventry Airport Tenants and Users Association (official body representing the operators and tenants at Coventry Airport): Objection:

- Site lies within the Green Belt.
- Contrary to the Local Plan.

- Site is an operational general aviation airfield, the closure of which is contrary to the NPPF.
- Approval could create a precedent with national repercussions for other airfields.
- Proposal is speculative, with no guarantees than any organisation will construct a battery factory. If approved the site will be developed for more warehousing or similar.
- Closure of Coventry Airport will force many well-established businesses to cease trading leading to loss of employment for those who work for them.
- There are other available sites.
- Environmentally the site is unsuitable.

WCC Archaeology: Following submission of information on trial trenching on the site, no objection, subject to condition.

WCC Landscape: Maintains objection:

- The majority of the site would be covered by major new buildings, associated car parking, large scale balancing ponds, extensive bunds, and an emergency access and drainage non-intervention zone with very limited public / private amenity green space.
- Greater detail on the design of the new buildings required.
- The development will adversely change the character of the immediate area. The proposed scale and massing of the new structures on prominent ground will dominate the site and punctuate the existing skyline.
- There is limited detail available on what the planting strategy would comprise.
- Bunds should be designed so that they look more natural rather than engineered.

Coventry City Council Planning Authority: No objection.

Conditions and Notes

Proposed amended wording to condition 9 (BREEAM requirements):

No phase of the development hereby permitted shall be commenced unless and until a pre-assessment and design stage assessment by an accredited BREEAM assessor demonstrating how the development will be designed and constructed to achieve as a minimum BREEAM standard 'very good' (or any future national equivalent) for that phase has been submitted to and approved in writing by the Local Planning Authority. Consideration must be given to the potential to incorporate large scale decentralised district heating networks such as Combined Heat and Power (CHP). Within six months of the first occupation of the development in that phase a completion stage assessment by an accredited BREEAM assessor demonstrating that the development in that phase achieves as a minimum BREEAM standard 'very good' (or any future national equivalent)

shall be submitted to and approved in writing by the Local Planning Authority. **Reason:** To deliver reductions in carbon dioxide emissions, building running costs, energy consumption and water use in accordance with the provisions of Policy CC3 in the Warwick District Local Plan 2011-2029.

Additional conditions requested by the Environmental Health Officer:

The submission of any reserved matters application for any phase of the development shall be accompanied by a noise impact assessment report for all operational noise for that phase, to be submitted to and agreed in writing by the Local Planning Authority for approval. The report shall include full details of noise mitigation measures for that phase of the development (including noise calculations). The noise mitigation measures approved shall be implemented in strict accordance with the approved details. The approved noise mitigation measures shall be maintained in a manner that achieves the noise attenuation specified in the approved report at all times thereafter. **Reason:** To ensure that the level of noise emanating from the site is confined to levels which would not cause unacceptable disturbance to the detriment of the amenities of the occupiers of nearby properties in accordance with Policy BE3 of the Warwick District Local Plan 2011-2029.

The submission of any reserved matters application for any phase of the development shall be accompanied by an air quality assessment report for all operational plant source emissions from that phase, to be submitted to and agreed in writing by the Local Planning Authority. The report shall include full details of air quality mitigation measures for that phase of the development. The air quality mitigation measures approved shall be implemented in strict accordance with the approved details. The approved air quality mitigation measures shall be maintained in a manner that achieves the mitigation specified in the approved report at all times thereafter. **Reason:** To ensure mitigation against air quality impacts associated with the proposed development in accordance with Policy NE5 of the Warwick District Local Plan.

Any potential odour processes within any phase of development shall be identified and an odour assessment (including external ducting flues) for that phase shall be submitted to and approved in writing by the Local Planning Authority. Any mitigation required shall be installed in full accordance with the approved details, along with an Odour Management Plan and the equipment shall be inspected by the Local Authority before the use hereby permitted commences within that phase. The equipment shall thereafter be permanently maintained in full accordance with the manufacturer's instructions and be operated at all times. **Reason:** To ensure that odours emanating from the site are confined to levels which would not cause unacceptable disturbance to the detriment of the amenities of the occupiers of nearby properties in accordance with Policy BE3 of the Warwick District Local Plan 2011-2029.

The development hereby permitted shall at all times comply with the Detailed Unexploded Ordnance (UXO) Threat & Risk Assessment (Dated April 2021), including the recommended risk mitigation measures. **Reason:** In the interests of the protection of health and safety in accordance with Policy BE3 of the Warwick District Local Plan 2011 – 2029.

A condition for a design code has been agreed with WCC Landscape:

No reserved matters shall be approved until a site wide Design Code for the approved development has been submitted to and approved in writing by the Local Planning Authority. The Design Code shall be in accordance with the approved parameters plan and the Nature Principles of the National Design Code 2021 (or any subsequent revision).

The Design Code shall include the following matters:

1. A hierarchy of the landscape elements that will contribute to the creation of high-quality place making that has strong visual and landscape connectivity with the site's immediate surroundings and the wider area. The design should be of a high quality, innovative, sensitive to, and in keeping with the area in which it is to be located. Advance planting and carefully designed bunding should be a consideration to help mitigate the development.

2. Reflect that access to usable and attractive green space is important for health and wellbeing and should reflect local needs, directly connect to the wider green infrastructure, namely the nearby Community Park, and create accessible and well-designed amenity green spaces. Trees and associated green infrastructure should provide for a range of functions and benefits and be proportionate to the built development and of a sufficient height at the time of planting to help mitigate the development. A list of species should be provided as a palette for use. This can include non-native species within the core of the development. Trees should be selected to reflect the local landscape character and which can provide valuable habitat and take account of local site conditions.

3. Consider sustainability and climate change, e.g. in terms of choice of materials, boundary treatments, water conservation, and sustainable drainage.

4. Neighbourhood views and middle to long distance views are considered to be sensitive and should be a design consideration. Green walls should be considered to help minimise landscape and visual impacts, particularly those which face towards the public realm. External lighting should be sensitively designed to avoid light spillage.

The reserved matters for any phase should reflect the approved Design Code or any subsequent amendment to the Design Code which shall first have been submitted to and approved by the Local Planning Authority. **Reason:** To ensure that the proposed development has a high-quality comprehensive design and in the interests of the visual amenities of the locality in accordance with the NPPF and Policy BE1 of the Warwick District Local Plan 2011-2029.

Condition from WCC Archaeology:

Prior to the approval of Reserved Matters for any phase of development:

a) A programme of archaeological evaluation is to be undertaken in in accordance with a written scheme of investigation for that phase which has been submitted by the applicant and approved in writing by the local planning authority. A report

detailing the results of this fieldwork is to be submitted to the Local Planning Authority.

b) An Archaeological Mitigation Strategy document for that phase shall be submitted to the Local Planning Authority. This should detail a strategy to mitigate the archaeological impact of the proposed development for that phase. Dependent upon the results of the trial trenching, this may include further archaeological fieldwork and/or the preservation in situ of any archaeological deposits of national importance.

Unless otherwise agreed in writing with the Local Planning Authority, no development shall take place in any development phase until the Archaeological Mitigation Strategy document for that development phase has been approved in writing by the Local Planning Authority and any fieldwork detailed in the approved Archaeological Mitigation Strategy document has been completed to the satisfaction of the Local Planning Authority. The post-excavation analysis, publication of results and archive deposition shall be undertaken in accordance with the approved Mitigation Strategy document.

Reason: In order to ensure any remains of archaeological importance, which help to increase our understanding of the Districts historical development are recorded, preserved and protected were applicable, before development commences in accordance with Policy HE4 of the Warwick District Local Plan 2011-2029.

Very Light Rail Project (Coventry City Council):

Queries have been raised regarding the potential to connect the site to the proposed "Very Light Rail" system which is being developed by Coventry City Council. Coventry City Council Highways Officers have provided the following information on this matter:

The Gigafactory, and the surrounding employment areas clustered around the Airport, would certainly provide opportunities for Very Light Rail (VLR) services connecting to Coventry city centre. The City Council, with its partners, have developed a prototype VLR vehicle and an innovative track design. Both the vehicle and track are about to commence the technical testing processes that are essential for the technology to secure the necessary approvals from Government. In parallel with this testing, the City Council will also be publishing the intended VLR network later in 2022 as part of the Coventry Transport Strategy.

In the discussions that have been held with the developers' consultants, VLR has been highlighted as an option for serving the site by public transport, with the aim of ensuring that passive provision for VLR is incorporated into the design of the development allowing VLR services to serve the site in the medium term. Initially, however, public transport access to the site will be operated by buses. These will be zero emission electric buses in line with the All Electric Bus City programme which will see all bus services operating within Coventry (including cross-boundary services into Warwickshire), operated by electric buses by the end of 2025.

There is a clear desire to connect the site to the VLR, however, owing to its early stage of its development, it is not possible to guarantee that this will be possible.

Therefore, Officers have agreed with Coventry City Council that the following wording would form an appropriate note for the developer:

"The applicant is encouraged to design the proposed multi-modal interchange, and associated access arrangements at the Gigafactory site to provide passive provision to accommodate future Very Light Rail services, in addition to the bus services that will be serving the site from the opening of the site, in consultation with Coventry City Council and Warwickshire County Council Highways Engineers."

Should Planning Committee resolve to grant planning permission, Officers recommend that the above changes to, and additional conditions are also approved by Councillors.

Section 106 Agreement

The proposed wording to secure the use of the site and future occupier within the S106 agreement is as follows:

Not to allow the Site to be used for any purpose other than the production and recycling of batteries and related low emission power technologies falling within Use Class B2 and activities ancillary thereto.

Not to allow the Development to be Occupied by any Occupier unless that Occupier has been approved by the District Council as being an appropriate commercial entity active in the relevant industrial sector with capabilities to deliver the proposed battery gigafactory outputs.

The applicant has agreed to add an additional clause within the S106 agreement which requires that the applicant assists the occupiers of businesses which are located within the application site to relocate to alternative premises using reasonable endeavours.

The air quality mitigation damage costs are agreed at £433,386.74, not £433,386.47 stated in the report.

Highways contributions

Inadvertently, Officers had double counted some of the contribution requests. These should read as follows:

£1,517,000 contribution towards management of the impacts on infrastructure associated with A46 strategic road link (agreed by WCC Highways, National Highways and Coventry City Council).

- WCC Highways contributions:
  - £250,000 towards active travel improvements to the south of the site;
  - £410,000 contribution to Baginton Gateway cycle improvements
  - £790,000 maximum contribution towards delivery of bus services to serve Warwickshire;

    - £1,250,000 maximum towards delivery of traffic management scheme through Baginton village;
- National Highways contributions:
    - £320,000 towards cycle infrastructure improvements to the A45/A46/A444 Stivichall Junction or an alternative scheme;
    - £400,000 towards cycle infrastructure improvements on the A45 Corridor, or an alternative scheme;
- Coventry City Council Highways contributions:
    - £150 per employee mobility credits, capped at £315,000;
    - £480,000 for improvements to W&C Howes Lane / to Finham;
    - £1,100,000 towards London Road Active Travel Corridor;
    - contribution £200,000 for improvements to St James' Lane to Willenhall / Binley;
    - £49,050 x 11 stations to be agreed for cycle hire scheme;
    - £1,200,000 towards bus service enhancements;
    - £80,000 for bus priority improvements at A444 / London Road;
    - £68,000 towards travel plan monitoring.

Should Planning Committee resolve to grant planning permission, Officers recommend that the above changes to, and additional clauses within the S106 Agreement are also approved by Councillors.

General

Loss of aviation facilities at Coventry Airport

Additional information provided by the applicant:

In terms of other airfields there are a range of facilities providing capacity for general aviation (GA) as an alternative to Coventry including (for example) Wellesbourne, Leicester, Nottingham, Northampton (Sywell), Wolverhampton, Banbury (Enstone), and Cirencester (Kemble).

Pilot training for private flying is available extensively elsewhere at a very wide range of locations nationwide, but just looking at those sites competing with Coventry they include (for example) facilities at Wolverhampton, Shrewsbury, Ludlow, Wellesbourne, Leominster, Burton, Derby, Nottingham, East Midlands Airport, Leicester, Cheltenham (Gloucester), Oxford, Northampton and Brackley. Other airports in the same ownership group as Coventry – at Exeter, Bournemouth and Norwich –accommodate companies which offer training, and there are no plans for that to change.

Pilot training for commercial flying (i.e. to carry paying passengers, cargo, mail) is somewhat different. It has tended to shift away from the UK to overseas locations where good weather and extended flying hours can be guaranteed. There is also a significantly reduced demand for such pilots currently due to the pandemic. There used to be a single commercial provider at Coventry but they took a decision to focus resources elsewhere and withdrew – this was based on demand and the shift overseas, not because of the planning application. Commercial training is, as you would expect, available at a smaller number of often larger locations in the UK – in this ownership group it is provided at Bournemouth.

Air Ambulance

Additional information provided by the applicant:

The applicant reached out to the Air Ambulance to discuss the application and offered support, alongside the Growth Hub, in their potential relocation. They did not respond for considerable time but have now engaged, and the applicant is due to meet them later this month.

It is important to note the status of the Air Ambulance as a tenant at the airport. The Air Ambulance has been aware and have committed to flexibility of their occupation at the Airport in terms of the tenancy agreement signed with the applicant. Moreover, they have not sought a long term commitment, presumably mindful that at some point they would look to better suited premises elsewhere. Through the forthcoming meeting and generally, the applicant has committed to continue to offer assistance for their relocation. The Air Ambulance have not objected to the application.

It should also be noted that the Air Ambulance does not need an airfield to operate from. A number of Air Ambulance services across the country do operate from airfields, but several do not. In essence all that is required is a hangar type building, some office and staff amenity space, and an area of hardstanding. A good example of this is the Midlands Air Ambulance based at Strensham Services near Worcester on the M5. This reflects the fact that the name "Air Ambulance" is a little misleading. Air Ambulance services do of course rely on helicopters but an important part of what they do is road based deploying rapid response vehicles, which means that an airside location at an airport might not be the best option.

Hydrogen Powered Vehicles

Queries have been raised regarding whether hydrogen-powered vehicles may become the preferred alternative to internal-combustion engines in the future, rather than electric vehicles.

Officers queried this point with Iceni Projects, who had the following response:

The focus of industry investment for cars is on developing EVs rather than Fuel Cell Electric Vehicles (FCEVs) although several fuel cell cars and vans have been developed globally. Our understanding is that hydrogen powered vehicles are expected to be focused more on larger/heavier vehicles such as trucks, buses/coaches and HGVs where the vehicle weight is higher; and for a limited segment of the market where longer ranges are needed. Ultimately it is not therefore one or the other – there is a role for both – but this is taken account in the various reports (and the forecasts within them), including the House of Lords Select Committee Report, which we considered.

The applicant was also asked for additional information on this point and provided the following:

Our research has not pointed to the adoption of hydrogen fuel cell technology being even at take off point for the domestic and industrial vehicle or other markets, nor indeed to this being imminent. In several key respects it is considerably behind Lithium battery technology (e.g. in terms of adoption by OEM vehicle manufacturers, its high energy requirements principally from fossil fuels currently, lack of hydrogen fuelling infrastructure, etc).

In contrast, data was published very recently (6th Jan 2022) to show that more electric cars were registered in 2021 than in the previous five years combined, according to the Society of Motor Manufacturers and Traders. Registrations of electric cars rose more than 75%, from 108,000 in 2020 to 191,000 last year. In December, they accounted for one in every four cars sold in the UK, while the second-best selling car in the country during last year was electric, namely the Tesla Model 3. To support this there are now nearly 30,000 public chargers in the UK, an increase of more than a third since the end of 2020. Hundreds more are being brought online every week.

For some electric vehicles there is a nine month wait to purchase them. The demand for battery powered cars is absolutely massive, growing exponentially, and will only be satisfied through imports unless we act now. The design and marketing effort of all the manufacturers is very firmly focused on electric.

A market for hydrogen powered cars simply does not exist at present. If we are going to halt petrol and diesel vehicle sales by 2030 we have to focus on electric.