Planning Committee: 11 January 2022 **Item Number: 5**

Application No: W 21 / 1370

Registration Date: 15/07/21
Town/Parish Council: Baginton **Expiry Date:** 04/11/21
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Coventry Airport, Rowley Road, Baginton, Coventry, CV3 4FR
Outline planning application with all matters reserved apart from access for the development of battery manufacturing facility with ancillary battery recycling capability including landscaping, car parking, access and associated works. FOR Coventry Airport Ltd and Coventry City Council

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INTRODUCTION

This report relates to an application that has been subitted by Coventry City Council (CCC) and Coventry Airport Ltd. for the development described above. The application site crosses the boundary between the administrative areas of Warwick District Council and Coventry City Council. Therefore the same application has been submitted to each authority. Each authority will make a decision on the part of the development that falls within their administrative area.

The boundary between Warwick District and the City of Coventry runs along the A45 and around the western and southern edges of the Stonebridge Trading Estate. Therefore all of the proposed building falls within Warwick District, with only a relatively small section of the red line site being within the City of Coventry, namely Tollbar Island.

If the Planning Committee resolve to grant planning permission, there is a requirement for the application to be referred to the Secretary of State who will decide whether or not to "call in" the application for a decision to be made by himself. This is because the Town and Country Planning (Consultation) (England) Direction 2021 requires applications to be referred to the Secretary of State where the proposals comprise inappropriate development within the Green Belt and where the development consists of the provision of a building or buildings where the floor space to be created by the development is 1,000sqm or more.

RECOMMENDATION

This application is being presented to Committee due to the number of objections and objections from Baginton and Bubbenhall Parish Councils having been received. The application is also subject to a Section 106 agreement and represents a departure from the Local Plan.

Planning Committee are recommended to GRANT planning permission, subject to the conditions listed in the report and the completion of a satisfactory Section

106 agreement, and subject to referral to the Secretary of State under the Town and Country Planning (Consultation) (England) Direction 2021.

Planning Committee are also recommended to delegate authority to the Head of Development Services in consultation with the Chair of Planning Committee to finalise the terms of the Section 106 agreement including any variation to, or clarification of, the sums requested where the revised sums meet the relevant statutory test.

Should a satisfactory Section 106 agreement not have been completed by 31st March 2022 and there is no ongoing progress towards the satisfactory completion of the Section 106 Agreement, Planning Committee are recommended to delegate authority to the Head of Development Services to REFUSE planning permission on the grounds that the proposal makes inadequate provision in respect of the issues the subject of that agreement.

DETAILS OF THE DEVELOPMENT

Outline planning permission with all matters reserved apart from access is sought for the development of a large scale battery manufacturing facility, known as a "gigafactory", with ancillary battery recycling capability, including landscaping, car parking, access and associated works. An Environmental Statement is provided with the application, in line with the requirements of the Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

Context

The applicant informs that a gigafactory is a very large battery manufacturing facility. The completed and fully operational gigafactory would be the largest single plant manufacturing operation in the UK. A typical process starts with the delivery of raw materials; anode active material, solvents, additives, binders and cathode active material, and proceeds through a mixing, coating and drying process to produce a cathode film and an anode film. These then progress through a process of cutting, stacking and packaging to enable the cells to be filled with electrolyte solution and cell testing. The cells are then arranged and assembled into module housings. The module housings can then be assembled into battery packs for use in electric vehicles or other applications.

At the other end of the supply chain is the ability to recycle and re-claim the active materials from retired batteries. In recycling existing batteries the metals (aluminium and copper) and the active chemicals are recycled in a process called cradle to cradle. The recovered elements are then processed and returned to the beginning of the battery production line again.

The applicant also states that the continued absence of large-scale battery production to support the ongoing Electric Vehicle (EV) sector in the UK seriously risks undermining the future automotive and other battery enabled sectors with a consequential adverse impact upon jobs and supply chain. The Government has identified Gigafactories as critical to the UK’s automotive sector, future economic growth, and Net Zero targets.

The applicant contends that the development will have a transformational impact on advanced manufacturing in Coventry and Warwickshire. As such, it will be development that is of significance at a national level, as the UK responds to the need to rapidly increase its capacity to produce the batteries that will support the transition to electric vehicles and the wider process of delivering alternatives to fossil fuel power.

Proposal

The submission indicates the extent of the site, the proposed access points, the amount, height and broad distribution of space to be delivered, and the strategic approach to landscape. This approach is intended to provide flexibility such that the precise requirements of any of the range of potential ultimate operators of the scheme can be accommodated.

The development will comprise of B2 use with ancillary office, warehousing and distribution covering a developable area of 79.9ha. The proposed development will be split into two 'zones', which will deliver a maximum floorspace of 529,648 m². It is assumed that there will be two main phases of development. At the end of Phase 1, the proposed development would be operating at 50% of its full capacity. The facility would be operating at full capacity by the end of Phase 2. The facility is proposed to operate 24 hours a day and seven days a week.

Key Parameters are set out as follows:

- The site boundary includes approximately 124.7ha of land extending from Bubbenhall Road in the west to the Tollbar Island in the east, including a length of Rowley Road to the north and incorporating the Airport.
- Six points of vehicular access including from Rowley Road just west of Tollbar Island, a further point on Rowley Road midway along the northern edge of the site, three entrances off the new link road around the western edge of the existing runway, and a final point at Bubbenhall Road.
- A maximum total of 529,648 sq m GIA of accommodation to be developed in B2 use for battery manufacture with associated ancillary activities.
- Three main areas, comprising Zone 1 and Zone 2 (to accommodate built development), and an extensive landscaped buffer.
- Zone 1 occupies the western, northern and eastern part of the site to be developed, of approximately 62.9ha. The maximum height of development in Zone 1 will be 26m, from a maximum floor level set at 83m AOD, albeit with a further allowance made for some spikes in height to accommodate flues / chimneys. This will have a maximum floorspace of 379,648 m².
- Zone 2 occupies the central / southern part of the site to be developed, of approximately 17ha. The maximum height of development in Zone 2 will be 36m, again from a maximum floor level set at 83m AOD, and again with a further allowance for flues / chimneys. This will have a maximum floorspace of 150,000 m².
- The buffer encircles Zones 1 and 2, varying in width with the broadest parts located at the western and eastern ends of the site. Save for where crossed by access points, and the inclusion of a service / emergency vehicle track, this area will be characterised by green and blue infrastructure, including SUDs features, and ecology / habitat enhancement. A maximum height of 10m for a landscape bund is identified.

- The Parameters Plan identifies at least 35.3ha of land within the site will be dedicated to landscaping, SuDS features and infrastructure. The Illustrative Masterplan included within the Design and Access Statement includes approximately 29.2ha of publicly accessible, multifunctional open space.

Whilst the proposal is for outline planning permission, an illustrative masterplan is provided to indicate how the proposed development could be accommodated within the site boundaries.

THE SITE AND ITS LOCATION

The site predominantly consists of Coventry Airport, with sections of, and links to adjoining highways, comprising a total of 124.7 ha of land. The site extends north eastwards from Bubbenhall Road to the junction of Rowley Road and Siskin Drive at Tollbar Roundabout. The site currently consists of an active airport, with runway, taxiways, airfield and aircraft stands, and a series of aviation related buildings along the north side of the runway. The site is located within the Green Belt. To the south is the 'Gateway South' employment development. The boundary with Coventry City Council runs along the northern boundary of the application site, including some areas of highways within the neighbouring District, and the 'Whitley South' development. The village of Baginton is located to the north west and includes a Conservation Area, with listed buildings, and the southern suburbs of Coventry extend northwards.

RELEVANT SITE AND PLANNING HISTORY

Coventry Airport:

Coventry Airport opened in 1936 as Baginton Aerodrome, and was an airbase during WW2. Following use as a military airfield during WW2, various airlines established flight operations with routes to and from the Channel Islands and Continental Europe.

In 1985, Air Atlantique commenced operations from the airport and in addition, took over the running of the airport operation itself during the 1990s. Air Atlantique operated scheduled passenger services as well as cargo operations, charter flights, air taxi service, flight training, aerial reconnaissance / survey work and marine pollution control.

In 2004, TUI commenced operations from the airport and took over the running of the airport operation from Air Atlantique at that point. TUI operated scheduled passenger services to and from international destinations. Air Atlantique's services continued and West Atlantic, as they eventually became known, operated from the site until they transferred operations to East Midlands Airport in 2017.

Following the refusal of planning permission for a permanent passenger terminal by the Secretary of State (ref: W/04/1939), in 2008 scheduled passenger services ceased. In 2009, the airport was closed.

In 2010, the airport reopened, and Rigby Group's aviation arm took over the operation of the airport and set up Coventry Airport Limited. The airport continued cargo operations as well as flight training and business aviation.

The airport currently offers recreational flying as well as flight training. Maintenance and occasional business jets operate at the site. The Warwickshire and Northamptonshire Air Ambulance and Children's Air Ambulance are based at the airport.

The Wider Site Context:

The sub-regional employment allocation in the Local Plan is generally referred to as "Coventry and Warwickshire Gateway", and was brought forward in two parts. Land to the south of the site is the larger part, and known as "Gateway South", whilst land to the north is known as "Whitley South"; the two parts are joined by a new link road just beyond the western end of the runway. Planning permissions have been secured to allow employment development on both parts of Coventry and Warwickshire Gateway.

RELEVANT POLICIES

- National Planning Policy Framework
- Warwick District Local Plan 2011-2029
- DS1 - Supporting Prosperity
- DS3 - Supporting Sustainable Communities
- DS4 - Spatial Strategy
- DS16 - Sub-Regional Employment Site
- DS18 - Green Belt
- PC0 - Prosperous Communities
- EC1 - Directing New Employment Development
- MS2 - Major Sites in the Green Belt
- SC0 - Sustainable Communities
- BE1 - Layout and Design
- BE3 - Amenity
- TR1 - Access and Choice
- TR2 - Traffic generation
- TR3 - Parking
- TR5 - Safe Operation of Aerodromes
- HS1 - Healthy, Safe and Inclusive Communities
- HS4 - Improvements to Open Space, Sport and Recreation Facilities
- HS5 - Directing Open Space, Sport and Recreation Facilities
- HS7 - Crime Prevention
- CC1 - Planning for Climate Change Adaptation
- CC2 - Planning for Renewable Energy and Low Carbon Generation
- CC3 - Buildings Standards Requirements
- FW1 - Development in Areas at Risk of Flooding
- FW2 - Sustainable Urban Drainage
- FW4 - Water Supply
- HE1 - Protection of Statutory Heritage Assets
- HE2 - Protection of Conservation Areas
- HE4 - Archaeology
- NE1 - Green Infrastructure

- NE2 - Protecting Designated Biodiversity and Geodiversity Assets
- NE3 - Biodiversity
- NE4 - Landscape
- NE5 - Protection of Natural Resources
- DM1 - Infrastructure Contributions
- Guidance Documents
- Distance Separation (Supplementary Planning Guidance)
- Parking Standards (Supplementary Planning Document- June 2018)
- Open Space (Supplementary Planning Document - April 2019)
- Air Quality & Planning Supplementary Planning Document (January 2019)
- Developer Contributions (Supplementary Planning Document - July 2020)
- General Aviation Strategy (2015)
- Warwickshire Landscape Guidelines SPG
- Baginton and Bubbenhall Neighbourhood Plan 2018-2029
- G1 - Protecting and Enhancing Local Landscape Character
- G2 - Protecting and Enhancing Local Biodiversity, Wildlife and Habitats
- G3 - Managing Flood Risk
- G4 - Traffic Management and Transport Improvements
- G5 - Additional Business Premises and Employment Opportunities
- BAG3 - Protecting and Enhancing Baginton Village
- BAG6 - Green Infrastructure
- BUB2 - Protecting And Enhancing Bubbenhall Village

SUMMARY OF REPRESENTATIONS

The comments below are a summary of the representations received. Members of the Planning Committee are recommended to read the responses received to the application in full, which can be found on the Council's website.

Baginton Parish Council: Objection:
- Impact on the Green Belt: the applicant downplays the contribution which the site makes to the Green Belt. The proposal is considered inappropriate development.
- General Aviation and National Policy: with so few general aviation airfields remaining in the country, to grant an application for speculative development on Coventry Airport would breach these national guidelines and would destroy a nationally important piece of infrastructure.
- Current Businesses and Employees: it is highly unlikely that these people will remained employed in their chosen field and the businesses that can survive will be forced to move out of the region. It is unacceptable to inflict additional costs on these businesses as a result of their relocation, including the air ambulance charity whose costs will rise for their return journey flight to base when they have to relocate further away from UHCW.
- Health and Safety / Accidents and Disasters: the application pays lip service to this with a wholly inadequate, assumption-based response that gives Baginton Parish Council no comfort whatsoever. There has been wholly inadequate consideration of the major accident hazards, the likelihood and severity of which has not been assessed or reduced so far as is reasonably practicable - toxic powder release, fires and release of toxic gases, release of

flammable vapours and explosion, risk of explosion from dust, flammable gases, natural gases, boilers, and release of chemicals into the watercourse.

- Location and Road Network: the airport site has no direct access to the motorway network and no rail link and looks inadequate when compared to e.g. a Tesla Gigafactory in Bridgwater that would have a site road linking directly to junction 23 of the M5 as well as purpose built on-site freight and passenger rail terminals. Another key strength listed for the site is its proximity to companies involved in battery innovation and research and development. Over the last 18 months, companies have adapted the way they operate due to the COVID restrictions and have shown that they do not have to be physically near to each other to interact effectively. It is unthinkable that any innovative company would put such a constraint on themselves.
- Impact on Baginton Conservation Area: unacceptable impact which is contrary to the Neighbourhood Plan.
- Power Supply: concern that there would be insufficient power supply.
- Hydrogen Cell Technology: technology has moved on and many manufacturers are investing in hydrogen cell technology as their preferred way forward. The special circumstances required under the NPPF to build on the Green Belt are not proven when there is doubt about the need for such a large facility to produce batteries that will potentially become obsolete in the near future, and with no end user identified.
- General: The EIA, with one hundred uses of the words "assume" or "assumption", is unreasonably vague and non-committal, showing insufficiently consideration for the true environmental impact of such a development. Consequently, the application is wholly insufficient as it fails to truly depict the harm that may be caused to residents.
- The site must remain in the Green Belt regardless of the outcome.

Bubbenhall Parish Council: Objection:

- Impact on the Green Belt: no very special circumstances to allow development; Coventry and Warwickshire Joint Green Belt Review of 2015 rightly identified the parcel of land in which the airport is located (C9) as 'high performing' Green Belt crucial to the prevention of the urban sprawl of Coventry; impact will be profound and cannot be mitigated; east of Baginton will become part of industrial estate.
- Scale of development: the output of the proposed gigafactory is to be 60GWh per annum, three times that of other such factories under consideration elsewhere in the country and in Europe. Recent analysis suggests that 7 factories, each producing 20 GWh per annum, would meet the nation's requirements by 2040. One such factory (Nissan, Sunderland) has received planning permission. There is no justification for a development of this size in Green Belt when alternative sites, some of which have planning permission, are available.
- Location of gigafactory: end users are not nearby; the Sub Regional Employment site (DS16) identified in Warwick District Council's Local Plan does not include Coventry airport, therefore the proposal is contrary to the Local Plan.
- Alternative Sites: applicant's review of 16 alternative sites is unconvincing and unjustified, mainly because it argues that none will accommodate an operation of the excessive scale being proposed. There are several alternative sites including West Midlands Central, Northampton Gateway, Rail

Central and DIRFT III, some with planning permission, which are suitable for a gigafactory. Other regional airfields/airports have been discounted because they are 'operational, but Coventry Airport is also operational.

- Climate Change: the total carbon emissions during construction and after the site is operational, plus the high carbon cost of steel and concrete used in construction of the plant make a mockery of Warwick District Council's 'Climate Emergency' and national and international agendas for dealing with climate change. No concerted effort to explore more sustainable forms of transport for raw materials and distribution of the end product other than by road. The cumulative emissions from HGV movements on a 24/7 operation, from employee vehicles and from the plant itself would contravene WDC's expressed determination to work toward a greener future for the region.
- Health and Safety: risk of fire nearby to residential properties and business park; use of toxic substances, emission of noxious odours, untested consequences of large scale battery recycling makes site unsuitable nearby to residential properties.
- Traffic: nearby road network already at capacity and additional traffic will result in traffic spilling into local villages and impact on amenity of residents.
- Employment: employment figures must be viewed with scepticism in light of exaggerated figures claimed in applications for Gateway South and Whitley South. Large scale battery manufacture is likely to involve robotic processes and to become increasingly reliant on technology rather than manpower. Lack of recognition of loss of jobs from airport.
- Lessons from the past: in April 2016 Warwick District Planning Committee was persuaded that the need for Jaguar Landrover to extend its operations at Whitley was so urgent that it required the granting of planning permission for Green Belt land at Rowley Road, Baginton ('Whitley South'). Planning permission was granted under 'very special circumstances'. Five years on the site remains unoccupied, the farm land stripped of top soil, and enclosed by an unsightly white perimeter fence, with JLR's future plans uncertain. What was identified as 'high performing' Green Belt south of the A45 is now lost forever. The same mistake should not be repeated.
- The planning committee should demand that the developer of this large scale project is identified, and should refuse to grant what is in planning terms, the equivalent of a blank cheque.
- The airport must remain within the Green Belt.

Stoneleigh and Ashow Parish Council: The Parish Council take a neutral position, but also request that the development should have the absolute minimum impact on the area around it. The land should be used sensitively to the local environment. We request that the Parish Council continue to be formally consulted during the development.

Rugby Borough Council: no further comments, following submission of additional information.

RT HON Jeremy Wright QC MP: Supports application:

- subject to confirmation of planning and sustainability details, and appropriate consideration of interests of local residents and the impact on transport network, the gigafactory would bring considerable benefits to the community;

- potential to create 6,000 jobs and reinforce the extensive local automotive supply chain and make it more likely that automotive manufacturers fundamental to the area's economy will stay here;
- the proposal is in accordance with environmental and industrial priorities;
- it is essential that the gigafactory is secured in the West Midlands to ensure that the automotive industry continues to thrive;
- the site is ideally placed to meet this objective.

Craig Tracey MP: Supports application:
- subject to confirmation of planning and sustainability details, and appropriate consideration of interests of local residents and the impact on transport network, the gigafactory would bring considerable benefits to the community;
- potential to create 6,000 jobs and reinforce the extensive local automotive supply chain and make it more likely that automotive manufacturers fundamental to the area's economy will stay here;
- the proposal is in accordance with environmental and industrial priorities;
- it is essential that the gigafactory is secured in the West Midlands to ensure that the automotive industry continues to thrive;
- the site is ideally placed to meet this objective.

Mark Pawsey MP: Supports application:
- unique opportunity to support West Midlands automotive sector, create jobs and deliver Net Zero;
- by delivering up to 6,000 jobs, the proposals will help secure automotive manufacturing in the region for the long term and develop new skills to meet the electrification challenge.

Marcus Jones MP: Supports application:
- vast benefits, not only to West Midlands;
- facilitating progress towards key national policy objectives;
- would put Coventry and Warwickshire at centre of UK's battery manufacturing, capitalising on the battery technology research and development, its strong automotive and transport manufacturing sectors, and its skilled workforce;
- urgent need for facility in UK, will provide a significant contribution to UK battery production;
- a trusted supply of domestically produced batteries is fundamental to the integrity of the UK’s automotive industry, and will assist with movement to carbon net zero;
- on the scale of that proposed, would accelerate our transition to EVs, which in turn would hasten improvements in local air quality;
- a gigafactory would reduce the cost of EVs by facilitating an enhanced economies of scale and a reduction to the cost of batteries;
- proposed facility in Coventry will play a crucial role in safeguarding our domestic automotive manufacturers and protect and create high skilled jobs;
- the facility will be well serviced by our fantastic transport network, this would allow for wide ranging distribution opportunities, and exposes the facility to a large and skilled workforce.

Nadhim Zahawi MP: Supports application:
- Offers a unique opportunity to back the West Midlands automotive sector, create jobs, and deliver Net Zero.

- If we are to maintain automotive production in the West Midlands and the UK, then we must secure large-scale battery production. This has been backed by several independent sources, including the Faraday Institute.
- The West Midlands is the home of the UK automotive sector, it is the obvious location for battery production.
- Jaguar Land Rover's global headquarters are in Warwickshire, along with others including Aston Martin Lagonda, London EV Company, and Lotus Engineering. The Coventry Airport site sits at the heart of it all and a West Midlands Gigafactory would immediately plug into this network to become the keystone of the battery supply chain.
- The proposals will also deliver up to 6,000 new jobs, helping to develop the new skills we need to meet the economic challenges of the future. Given its location at the heart of the automotive and battery supply chain, its size, and scale, Coventry Airport is the ideal site for a West Midlands Gigafactory.

Councillors Redford and Wright: Objection:
- the site is green belt and should be protected. If very special circumstances are proved, the site should remain green belt land to protect it from development. Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development;
- the projected contribution towards the economics of the area particularly in terms of employment must be clarified in depth with supporting data as this is a key decision element, as in the past, decisions around the perceived economic projections in terms of Coventry Gateway have proved to be both inaccurate and misleading;
- the area is already experiencing unprecedented disruption and intrusion from ongoing development;
- recognise that the development could provide opportunities to improve the highway and transport network, reducing traffic through the villages;
- any future occupier may result in changes to the proposed outline permission - risks will therefore need to be carefully controlled through planning conditions;
- any approval must restrict the site for the specific purpose of the gigafactory or associated manufacturing process;
- refers to comments made in reference to the associated screening opinion which should also be considered.

Councillor Kaur (Portfolio Holder for Economy & Place at Warwickshire County Council): Supports application: it is crucial that the area secures a gigafactory to enable the manufacture of the batteries that will drive this future growth. As well as being a key component to our wider economic growth and prosperity, helping to retain and attract more automotive research and development and production facilities within the area, it will directly lead to the creation of a significant number of new, highly skilled and well-paid jobs.

Andy Street (Mayor of the West Midlands): Supports application:
- offers a critical opportunity to invest in the West Midlands, support world leading automotive sector, create jobs and deliver Net Zero;
- electrification is the biggest change to the automotive sector since the internal combustion engine. Delivering battery manufacturing within the UK is

therefore critical to our economic growth, and the continued success of our leading manufacturers on the global stage.

- Gigafactories are the keystone of the battery supply chain and, as the home of the UK automotive sector, the West Midlands is the obvious location for a gigafactory investment. This principle is backed by the entire region and our vision is supported by Government, including the Prime Minister.
- Critical research and development are located a stone's throw from the Coventry Airport site and will support the development of a West Midlands gigafactory, as well as its ongoing operation. No other location – either in the West Midlands or further afield – can boast such credentials.
- In addition, Jaguar Land Rover's global headquarters are in Coventry and Warwickshire, along with others including Aston Martin Lagonda, London EV Company, and Lotus Engineering.
- At the heart of this eco-system sits Coventry Airport, the ideal site for a gigafactory. The proposals will create 6,000 new jobs and support a comprehensive investment in skills to meet the challenges and opportunities of electrification. The site is backed by all relevant regional partners, as well as industry.

All Party Parliamentary Group on General Aviation: Objection:

- The West Midlands is already under provided with General Aviation (GA) airfields, the only other option for the same range of aircraft types being Wellesbourne, which itself is under threat.
- It was, until the recent unauthorised dismantling of its navigation aids, the focus for a broad range of GA operations including charters, emergency services and training in all aspects of aviation, not just aircrew. It was a centre of employment for highly skilled engineers and local businesses until the recent decline under the present head lessee abetted by the Local Authority landlord
- Coventry is very likely to be considered a key part of the Strategic Airfield Network actively being discussed by the Department of Transport, the GAAC and APPGGA.
- its regional contribution to the West Midlands economy, its continuing engineering heritage, proximity to large urban markets, it also benefits from good rail and motorway connectivity. The region really has a rare asset worth conserving for the future.
- The needless loss of the Coventry runway when the UK is trying to rebuild its economy would be a tragic waste of an irreplaceable infrastructure asset and a stinging indictment on the region's aspirations for long (not short) term economic growth.
- In recent years the head lessee has generally ignored its obligations under the lease and progressively emasculated the key aviation facilities, particularly the navigation aids, without any consultation or notice to the users and operators. This process has reduced GA traffic, particularly the higher revenue providers, or driven it elsewhere.
- the rationale that the site is located nearby to car manufacturers is not supported by the facts.
- the proposal is not compliant with local or national planning policy regarding the green belt.
- there are suitable sites elsewhere for the development.
- batter recycling plant will be a hazard and source of pollution.
- queries whether there will be demand in long run for electric car batteries

Historic England: Level of harm to heritage assets is considered to be less than substantial, however, further information is required in order to quantify the degree of less than substantial harm.

Warwickshire Wildlife Trust: Original comments still remain valid, particularly:

- biodiversity offsetting and mitigation should only be used as a last resort;
- detailed conditions should be provided to ensure that suitable habitat for skylarks are actually delivered, suitably maintained and monitored over the long term;
- BIAs should be carried out as early as possible to ensure that impacts can be suitably mitigated.

WCC Ecology: No objection, subject to conditions, and biodiversity offsetting and skylark mitigation measures to be secured through the S106 agreement.

WCC Archaeology: Objection to the proposed development on the grounds that the scheme is not supported by sufficient information which would enable a proper and detailed assessment of the potential impact the proposed scheme is likely to have on archaeological deposits of importance and possibly worthy of conservation in whole or in part or of being fully investigated and recorded.

Environmental Health: No objection, subject to conditions and air quality mitigation damage costs of £433,386.74.

WCC Landscape: Further clarification sought regarding the impacts of the proposal in the context of Gateway South and additional cross sections. Comments that w design objectives and the production of a Design Code.

CPRE: Objection:

- scale of proposed development: not justified - the provision of a development this large is not required to meet forecasted demands. End user car manufacturers are not located locally. Proximity to research and development facilities nearby is irrelevant to location;
- alternative sites: inappropriate development in Green Belt. Alternative sites have not been properly considered, with unreasonable rejection of some sites. Justification for selecting Coventry Airport is fundamentally flawed;
- road traffic: lack of evidence and justification of traffic modelling data. Local roads will not be able to cope with full impact of HGV movements. Will create congestion for residents of local villages. Failure to address more sustainable forms of transport of products is major issue;
- traffic assertions within the Environmental Statement are contradictory, making this document unsound;
- emissions: superficial analysis of road traffic means noise and air quality assessments cannot be relied on. Impacts on climate change are not fully assessed in proper way;
- landscape and visual impact: study area for LVIA under estimates impacts. The landscape impacts would be far more widespread and damaging. Lack of assessment from key visual locations, lack of justification of assertions within the LVIA;

- impact on the Green Belt: Green Belt review fails to address Local Plan policies DS4 and DS16. Green Belt review fails to fully take into consideration findings of 2009 Joint Green Belt Review. Presents a biased view of the 2015 Cov and Warwickshire Joint Green Belt Study. No weight should be given to the applicant's Green Belt review. The site forms an essential part of the Green Belt, exceptional / VSC have not been established by the applicant. The site must remain in the Green Belt;
- deviation from Local Plan: no justification for deviation from Local Plan.

Conservation Officer: No objection, a strong business case has been presented that identifies strong economic and social benefits regionally, and environmental benefits on a national scale – on balance these benefits outweigh the harm caused to the significance of designated heritage assets in accordance with heritage policies of the NPPF and HE1 of the Local Plan.

Network Rail: No objection.

WCC Minerals Planning Authority: No objection, agrees with the assessment that quantity of safeguarded sandstone on the site is too small to be commercially viable and that deep coal would need to be worked using underground methods. However, safeguarded sand and gravel deposits could be addressed. Recommends provision of construction management plan.

Tree Officer: No objection, subject to condition.

Warwickshire Fire and Rescue: No objection, subject to condition.

Natural England: No objection, based on the plans submitted, Natural England considers that the proposed development will not have significant adverse impacts on statutorily protected nature conservation sites or landscapes.

Environment Agency: No objection, subject to conditions.

Health and Safety Executive (HSE): No objection, hazardous substances consent may be required, the site may constitute a COMAH establishment once operational.

WCC LLFA: No objection, subject to conditions.

Warwickshire Police: No objection, requests that the principles of Secured By Design Commercial 2015 be incorporated into the design.

National Air Traffic Service: As NATS operates no Air Traffic infrastructure within 10km of the proposal site, it anticipates no impact and has no comments to make on the Application.

Public Rights of Way: No objection.

Sports England: No comment.

Fire Authority: No objection, following clarification of fire safety measures.

WDC Programme Director for Climate Change: No objection, but would suggest that conditions are attached to the outline permission to ensure that measures to minimise carbon emissions and to comply with CC1 (as detailed in the planning statement and sustainability assessment) are incorporated as a minimum at detailed application stage

Coventry and Warwickshire Local Enterprise Partnership (CWLEP): Supports application:

- planning application is a vital step in securing the future of manufacturing in our region from automotive to aerospace and cementing our place as a leader in future mobility.
- demand for battery manufacturing is increasing exponentially and Europe is accelerating their capacity and expected to provide 800 GWh by 2040. The UK will need at least four gigafactory plants by 2030 to meet expected demand and protect the future of an industry pivotal to our economy.
- understand and appreciate the concerns of businesses who will be relocated due to this application and we are working with them through a range of channels including our CWLEP Growth Hub.
- Current UK commitments to gigafactory production will produce approximately 30 GWh across a number of sites and there is widespread recognition from industry experts that we need a step-change in approach. This is why the proposed West Midlands gigafactory capacity will be 60 GWh.
- Sites need to be large, strategically located for transport links, and have access to renewable energy. This is where this planning application is so crucial as it is the optimal site to meet these requirements coupled with very close proximity to UKBIC. It is also a site served by two world-class universities in Coventry and Warwick and three leading Further Education colleges all developing electrification skills curriculum and apprenticeship provision including WCG, NWHSLC, and Coventry College.
- Safety, regulation, and the economics involved in battery manufacture mean that a gigafactory will be a key regional anchor for automotive and future mobility industries and this is something we must work together to deliver for Coventry, Warwickshire, and the wider West Midlands. It will secure the future of our businesses and our communities driving significant private investment and providing highly skilled work opportunities for years to come.

Open Space: 6000 employees results a minimum of 15 ha of open space being required (Parks and Gardens 6 ha; Natural Areas including Urban Woodland 6 ha and Amenity Green Space 3 ha).

WCC Infrastructure: No objection, subject to monitoring fee in region of £10,000 TBC.

National Highways: No objection, subject to conditions and financial contributions.

Royal Mail: Objection:

- Under section 35 of the Postal Services Act 2011, Royal Mail is the UK's designated Universal Postal Service Provider, supporting customers, businesses and communities across the country. Meeting Universal Service Provider obligations is in the public interest and this should not be affected detrimentally by any highway or development project.

- Royal Mail currently occupies and are the leaseholder of Coventry South Delivery Office, immediately adjacent to the north of the proposed development site. Royal Mail currently also occupy and are the leaseholder of Parcelforce National Hub, immediately adjacent to the south of the proposed development site.
- Coventry South Delivery Office is the largest unit within the Coventry area and is a main mail, collection and distribution hub whilst also a mail processing unit. The Delivery Office delivers post and parcels to a minimum of 97,000 households, covering postcodes CV1 – CV5 and CV8. It also receives mail from South Midlands mail centre
- Royal Mail already experience major congestion when entering and exiting the unit onto the Toll Bar island A45, A46 and London Road. During the Christmas period due to the high levels of shoppers and cars visiting the new shopping park, this becomes a major operational issue daily. The congestion at peak operating hours hinders timed deliveries, collections and distribution operations plus daily delivery's due to staff having to wait in the traffic around the site. There have also been major housing development approved and implemented in the last 5 years.
- All these factors together have an impact on the road network, the proposal of this size is very likely to have a severe detrimental impact on the highway network. Royal Mail are concerned that the proposed active travel and improved public transport will not sufficiently mitigate this impact.
- No Construction Management or Construction Logistics Plan is submitted. A Plan must be prepared in consultation with Royal Mail and other existing operators to manage construction impact on the local road network.

UK Civil Aviation Authority Airfield Advisory Team: Objection:

- Coventry Airport has always played an important role in the UK network of GA aerodromes. The airport represents one of only a few of our GA aerodromes large enough to accommodate large airliners making it a viable destination of choice for business aviation.
- With unmanned aircraft systems and their various potential applications getting ever closer to commercial reality, Coventry Airport could benefit from its current position and lead the way in testing and development with academia. It could become one of the first GA aerodromes to benefit from new inward investment from tech firms and mail order giants that will inevitably seek to diversify and benefit from the opportunities that unmanned aircraft systems (UAS) will present.
- The current lease holders of the site could expand their business aviation aspirations.
- The many based operators located at Coventry play a part in the local economy and provide employment. They require the airport to remain operational for the purposes of their business. If the airport were to be closed, not only would these based operators be forced to move elsewhere or close, but a vital link for the next generation of aviation professionals will be lost from the region too.
- Airports like Coventry play a key role in providing access to the aviation industry for the next generation who are considering a career either in aviation or other STEM related professions. Closing Coventry Airport does nothing to support the aims and objectives of the NPPF in recognising the

importance of our GA network of airfields. It would undermine DFT objectives of promoting and boosting the viability of UK General aviation.

'Save Coventry Airport' (collection of airport users and aviation enthusiasts, which has around 450 members): Objection:

- The proposal is contrary to the Local Plan and NPPF: inappropriate development within the Green Belt, without adequate very special circumstances which outweigh the harm caused.
- No consideration given to the General Aviation Strategy and no consideration is given to aviation in the Local Plan: loss of highly skilled jobs from the area, loss of the Air Ambulance resulting in longer response times to emergencies.
- Risk of precedent of allowing redevelopment of local airfields.
- Hazardous to health and safety to those living and working within the local area: supporting information lacks detail on risks of fires and mitigation. Warwickshire Fire and Rescue and West Midlands Fire Service have concerns regarding the proposal.
- Lack of consultation for occupants of site on proposals.

Public Responses: 261 Objections:

Where address known, approximately: 24% from residents living / working within Warwick District; 14% from residents living / working within Coventry City; and 62% living / working elsewhere within the UK.

Impact on the Character of the Area:

- It will be an eyesore
- Overbearing
- Out of character with the area
- Poor design
- Massive buildings barely 150m behind Conservation Area cottages will not respect, reflect and reinforce local architectural and historical distinctiveness.
- Projected building size and heights will not respect surrounding buildings in terms of height, scale, form and massing.
- it will completely and irrevocably consign the ancient village of Baginton, with multiple sites of historic interest, and conservation area to the status of pretty much an industrial estate, swallowed up within the hundreds of hectares of sterile steel building development and industrial premises, changing the character and nature of the village beyond recognition.
- The green space provided by the airfield at the moment is now the sole remaining open space factor breaking up the monstrous developments known as the gateway project, especially once the housing developments are established on the newly approved land opposite the airport.

Health and Safety:

- battery manufacturing requires the use and storage of dangerous chemicals; questions safety of building
- toxic acidic fumes being vented into village
- the decision should not be made until an operator is found who can confirm all of the processes required and an assessment can be made on the impacts of these on health and safety.

- Requests additional information on long and short terms impacts of the development on health, which should be provided before the application is determined.
- There have been 25 solar farm battery bank fires in the last 2 years, with the most recent taking 3 days to put out. The proposal is silent on accidental discharge of toxic fumes.
- Risk of fire and serious risk to human health
- Health impacts from additional air pollution

Pollution and waste. Air quality / Climate Change:
- detrimental impact on air quality from factory and additional traffic
- pollutants pose environmental risk to surrounding area
- mining the raw materials required for the electric batteries has a detrimental impact on C02 emissions.
- The site does not currently have a suitable connection to the national grid, and a site for this is shown on the plan, so a considerable yet unquantifiable amount of Co2 will be created just to provide the site with a suitable (promised below ground) grid connection, to deal with the demand of staff EV charging let alone unknown operating loads.
- Heating the building will create a significant amount of C02 emissions
- construction of the building will produce significant volumes of C02 emissions
- the battery manufacturing process will produce significant volumes of C02 emissions
- solar supply and replacements required over the lifetime of the development will produce C02 emissions.
- any attempt to put out fires requires a lot of water, the runoff is unmanageable resulting in these toxic chemicals entering the ground soil contaminating the site, which is not covered within the supporting information
- lack of confidence that full environmental impact has been rigorously assessed
- The submission is damaging to the environment chasing old technology already discounted by professionals
- The application does not take into account risk and airborne contamination in the event of fire.
- environmentally unfriendly processes with dangerous and polluting chemicals used in all processes, and as has been witnessed, there is a serious risk of fire and toxic pollution, should a fire occur, either in the production stage, but particularly in the environmentally unfriendly battery reclamation process

Impact on wildlife and habitats
- protected species have been viewed on the site
- grassland areas make a fantastic nature reserve
- if pollutants escape, this would be extremely damaging to local wildlife
- loss of trees and habitats

Green Belt
- Loss of Green Belt land.
- The proposal fails to recognise the overriding value of the openness and permanence of national green belt policy. The site is very open when approached from Baginton and should be protected.

- The proposal is contrary to Local Plan policy relating to protecting green belt land.
- The site was not included in the sub regional employment site or safeguarded land and was retained as green belt to prevent urban sprawl.
- Lack of very special circumstances for development in the green Belt: cited VSP for Whitley and Gateway projects were not proven, more green belt land should not be lost when adjacent land has not been developed in accordance with conditions to justify green belt removal. List of alternatives sites is insufficient - Honiley airfield not included.
- Insufficient assessment of visual impacts on the green belt.
- Coventry Airport was intentionally retained as Green Belt to protect nearby villages from large scale development.
- Risk of setting harmful precedent

Highways / Parking
- Additional traffic generation
- Impact on traffic congestion
- Inadequate access
- Inadequate parking and servicing
- Traffic delays will have an adverse impact on regional economy.
- Speeding within Baginton village not adequately considered.
- The increased traffic in, and out of, the Coventry Airport site, could present even further congestion and delay urgent, critical care

Landscape/Design:
- size, shape and poor design of development is not acceptable
- footprint and height are too large in rural landscape
- overbearing nature
- out of character with the area
- not including the recycling facility would reduce the footprint considerably

Impact on residential amenity
- noise,
- vibration
- wellbeing
- loss of privacy, loss of light
- overshadowing
- lighting from the factory
- odours
- Combined approved and proposed development is already having a detrimental impact on mental health and physical wellbeing of nearby residents
- increased opportunities for fly tipping
- open space provision at the site will give little feeling of openness or enjoyment
- residents have already suffered significant disruption from ongoing works nearby
- loss of rural village community life
- mitigation measures on existing developments are not adhered to by construction workers.
- the existing, drawn out construction, with its associated noise, dust and disruption to local activity has already taken a toll on our family and other

village families. For example, the newly built battery research centre makes a constant and disturbing whining noise, the In Transit transport hub produces constant vehicle noise 24 hours, with horns beeping and other unpredictable noises that are impossible to get used to.

Lack of supporting infrastructure

- moving raw and production materials to the site - lack of nearby motorway / rail access
- lack of housing and infrastructure to support incoming families moving to area for jobs
- distance from raw materials is significant and there is a lack of carbon-neutral transport infrastructure to support the development
- water / electrical supply unable to cope
- lack of nearby rail link

Loss of the airport

Aviation:

- Coventry is designated a safeguarded civil airport and closure goes against the Government General Aviation Strategy.
- Is not in alignment with the DTI or the DOT Aspirations for aviation for the UK.
- The application is in conflict with CAA Policy (DfT) and is covered within the Civil Aviations Road Map
- The application is in conflict with the Government Policy for levelling up and directly impacts our business and those of prospective investors.
- Conflict with National Policy as covered within the Ministerial Statement by the Rt Hon Robert Courts MP.
- Substantial increase in online shopping and changes to flight patterns more generally means that substantial increase in air freight and smaller aircraft will follow, which this airport is suited to.
- Failure to recognise significant contribution the airport has made to training future pilots.
- Technology in Aviation and Aerospace is advancing at a pace where Air Mobility and Electrical propulsion technologies will require Airport sites to facilitate local and national integration. Those regions without the infrastructure will be in real danger of being left behind.
- Premise of the airports requirement that any land sold on the airport must be for aviation activity, which the gigafactory would not be.
- Wellesbourne airfield cannot handle the aviation traffic that was able to use Coventry Airport, and therefore cannot be considered as an alternative, which would mean if Coventry is closed, the West Midlands and the City of Coventry will lose a very valuable asset
- Why could the zero emission airport next to the Ricoh not be sited at this site.
- Land disposals have been completed by Coventry Airport Ltd since acquiring the 150-year lease to operate and develop Coventry Airport capabilities. These land disposals have served to weaken the ability of the Airport to attract new business. Furthermore, many of the existing operators and supporting businesses have been driven away due to the planed systematic / strategic withdrawal of facilities and lack of capital investment by CAL Ltd - Supporting the Rigby Group's interest in real estate developments, Coventry City Council has already approved the development and sale of a significant

proportion of the airfield area by CAL. This included the redevelopment of the South Side Airport Terminal, in return for which CAL (the Rigby Group) had agreed to invest around £10M of the profit from the development and sale of the land in order to make the airfield sustainable for the future. The developments took place, but there is no evidence of the re-investment having happened.

- Airline operations in West Midlands region have become wholly concentrated at Birmingham Airport. Consequence was that Coventry has taken much of GA activity, thus developing into a significant GA airfield serving needs of West Midlands and being of national importance.
- Coventry City Council has plans to promote the development of Urban Air Mobility businesses in the area - the loss of the airport would hinder progress in this regard.
- Coventry could be grown and expanded and provide jobs much more quickly than this proposed development. With an additional 1000m of runway, for which there is ample space, why not compete with Birmingham either for passengers or freight? Coventry is better suited, having approaches that have less impact upon dwellings, to take traffic than Birmingham. Add a grass runway to enable GA and commercial to grow together maybe? All of these take a business area that is already providing employment and grow it rather than destroy something that is working to build something with an unquantifiable chance of success.
- The closure (or even the threat of the closure) of Coventry Airport will leave GA operators open to a potential monopoly and will severely affect their ability to continue maintaining their aircraft safely and economically.
- Airport has been constructively run down over the last 3 to 4 years, by selectively removing the excellent facilities that the airport was able to offer by closing down the instrument landing system for both runways, the radar service, the NDB, the DME, and Air Traffic Services along with Fire categories and reducing the airports use by limiting hours and restricting operations to 5 days a week. These punitive actions have caused significant based operators to move away from Coventry, this in turn reduced the substantial contribution that they provided.

Facilities:

- Loss of the airfield as facility for training, air ambulance, runway, fire station, historic value, aviation history.
- Lack of consideration of current flying and engineering activities and what will happen to these.
- Coventry Airport offers specialist aircraft maintenance facilities and an instrument approach which is vital for pilot training and ongoing currency: it is one of the few in the Midlands and South of the country that is available for these purposes.
- Loss of instrument runway, aircraft maintenance companies.
- Some functional length of runway should be retained.
- A runway could be provided on top of the buildings.
- Loss of diversion airport.
- Electrically powered aircraft will be the future, which this site will not be able to benefit from if removed.
- Other airfields are not suitable for relocation.

- The application fails to recognise that based at the airport is one of the largest Maintenance and repair Organisations (MRO`s) in the country employing directly from the West Midlands, competent aircraft technicians.
- Airfields are a tactical necessity to us as citizens of a country that is surrounded by water and Coventry has a superb, large general aviation airfield with an excellent location at the heart of England. It would be extremely resourceful to maintain this site as a strategic tool as it could be used for anything from freight to military use.
- The fewer airfields like Coventry Airport are in the UK, the fewer pilots can be trained and join the airlines.
- Coventry is home to the UK's oldest flying jet aircraft, as well as several air museums which host a variety of extremely rare non-flying British aircraft, some of which do not survive anywhere else - these would be lost if the airport closes.

Economic:
- Loss of jobs and teaching opportunities as a result of the loss of the airfield, and associated loss of livelihood and community.
- Detrimental to strategic transport infrastructure.
- The existing airport provides valuable economic investment locally and nationally towards general aviation.
- Loss of airport would have potentially disastrous economic consequences in medium to long term for Coventry and Warwickshire. There are development projects in process which will transform light aviation over next 5 years (eg drone based aircraft national delivery system / helicopter cargo drone system which need to operate from local / regional airports; air taxis; air bus services; air freight).
- Any financial justification for ceasing to operate the site as an airfield is therefore unreliable and should not be used to support the desire by Coventry City Council and the Rigby Group to cease airfield operations to replace them with a gigafactory.
- Suggestion to install solar panels around runway to generate more income if needed by the airport.

Other:
- The airport is low maintenance and less threat to the local community.
- Social benefits from airport will be lost.
- To protect existing airport users, a producer and exact requirements must be secured before a site choice is finalised.
- Loss of open green space will have detrimental impact on mental health.

Surface Water Management:
- the FRA was carried out based on the existing site and does not account for the sheer size of construction in the proposed development
- Without a robust surface, water management system to be concluded at this early stage of planning, serious risk of increased load will be placed on the Avon adjacent to the airport's boundary, resulting in serious level changes downstream in Stratford upon Avon
- The application does not appear to have given sufficient regard to flooding issues

Misc:

- Lack of end user - Allowing future development of a nature not subject to the rigors of public scrutiny
- The application is in conflict with CAA Policy (DfT) and is covered within the Civil Aviation Authority's Road Map
- The application is in conflict with the Government Policy for levelling up and directly impacts our business and those of prospective investors.
- conflict with National Policy as covered within the Ministerial Statement by the Rt Hon Robert Courts MP.
- Gigafactory may be obsolete when hydrogen powered cars are the norm.
- the Government needs to set stricter legislations to control lithium extraction as such proposals tend to be scarce and take years to materialise. We must ensure both the long-term sustainability of lithium supply and minimize the impact on local communities and environment.
- Would be better suited in an industrial area, closer to where product is being used.
- Site Choice: Of 16 suitable sites it appears that this site was chosen above others on measures open to bias and was heavily favoured through offer and promotion of the applicant owners
- The case for the sole of use of electric powered transport to reduce emissions is simplistic and far from sustainable. Simply replacing millions of vehicles with combustion engines on the road today with electric vehicles is anything but environmentally friendly and climate neutral.
- where will power supply come from for factory
- battery technology is already outdated before production starts
- the owners of the site have failed to invest in it, resulting in its decline and it being unviable
- there are other locations where this development could be sited
- the development is speculative, with no investor identified
- contrary to local and neighbourhood plan
- green credentials of gigafactory are not proven
- the closure (or even the threat of the closure) of Coventry airport will leave GA operators open to a potential monopoly and will severely affect their ability to continue maintaining their aircraft safely and to economically.
- the existing owners of the site have let it become run down and local people would be willing to invest in the site to develop it as an airfield
- the assessment of other locations is contradictory
- lack of information on security and disaster planning
- the submission is not comprehensive and unprofessional
- detrimental impact on nearby Conservation Area and listed buildings
- concern over speculative nature of the development and whether an end user will be found
- site is too small for a gigafactory, with no room to expand
- loss of wildlife and habitats
- loss of trees
- poor track record of Rigby Group with previous developments
- increased risk of surface water flooding
- the production methods are not 'green'
- Roxhill is owned by Peter Rigby and family and are promoting a large employment based development immediately north of Coombe Abbey Pools amounting to some 300 acres. Although this is on hold, the inevitable

conflicts are obviously very considerable. Rigby etc al own the leasehold of the land of the proposed gigafactory.

- village is losing any identity.
- lack of public consultation
- increased risk of littering
- the application does not appear to contain stakeholder reports from Warwickshire Fire and Rescue, Coventry Fire Service, NHS local trusts, Local and County Police, covering the required Emergency Response Plan
- the application does not appear to contain stakeholder input from HM Government as part of Emergency Response and Recovery.
- impact on property values.
- the application site is not nearby to car manufacturing centres, as JLR, Aston Martin and LDV do not have manufacturing facilities nearby.
- no battery manufacturing owner/manager has been selected, therefore, how can The Rigby Group actually clearly define the actual size and construction of the production facility required for battery manufacture, which would undoubtedly be tailored only to service JLR, Aston Martin and LDV, and yet the application is for the whole of the site, which is totally unacceptable
- airport has been constructively run down over the last 3 to 4 years, by selectively removing the excellent facilities that the airport was able to offer by closing down the instrument landing system for both runways, the radar service, the NDB, the DME, and Air Traffic Services along with Fire categories and reducing the airports use by limiting hours and restricting operations to 5 days a week. These punitive actions have caused significant based operators to move away from Coventry, this in turn reduced the substantial contribution that they provided
- there is so much money, and so many influential parties that the decision is as good as made, and that we are pretty much powerless and insignificant when it comes to having any bearing on the decision which will affect our daily lives so dramatically.
- it would seem that it has no central government support other than the business secretary taking part in a West Midland Mayor's electoral video. This is just a back door way of allowing the site to be developed for other purposes.
- The applicants have failed to provide all the relevant detailed environmental information required for a proposed development of this type, they have also failed to enter into the required public consultations.
- by the nature of this plant it would be processing both hot metals and toxic chemicals, by definition the application falls under the remit of the AARHUS Convention which promotes Good Governance and Human Rights in the Environmental decision making process, it also provides for access to a Judicial process in respect to these matters. WDC and CCC as Public accountable bodies have neglected the Governance and guidelines provided by this Convention and have failed to ensure the applicant adhered to them.
- the Environmental Impact Assessment provided by Wardell Armstrong in July 2021 fails to provide the required level of detailed information and is repeatedly reliant on vague references to detailed information to be provided by any potential end user in the future. They also rely on the same tactic when addressing detailed design to resolve major safety issues.
- all 20 support comments are driven by unsubstantiated enthusiasm towards the gigafactory idea, without offering real insight into the matter or considering aviation-neutral alternatives.

- supports comments made by Baginton Parish Council.
- consultation with Highways England is flawed; the assessment on pathing does not consider raw materials, as the pathing assessment being conducted is to the M6/M1 corridor and not towards the south west via the M5 where minerals are located. The M40 and M42 are documented both at capacity and I see no real assessment of route for road freight. The pathing does not consider the expansion of Middlemarch, Gateway South or completion of Binley Woods interchange, a limit of 40mph for any form of site surveyors will bring the entire south of Coventry to a standstill topographical, geotechnical and environmental surveys need to be carried out on such a vast site requiring a significant number of engineers and plant. before any form of proper design model can be implemented.
- the Geotech surveys submitted as part of the application around the runway are out of date using old techniques and is not valid base information to carry out proper design based on low technology measurements of ground formations only carried out for runway resurfacing. It should also be noted that a bat assessment has not been carried out.
- the potential occupiers listed in the supporting information already have ties to battery manufacturers, so the development will not be required.

22 Support:

Where address known, approximately: 50% from residents living / working within Warwick District; 28% from residents living / working within Coventry City; and 22% living / working elsewhere within the UK.

- airport as commercial proposition is in decline and the area needs to be developed as it has no future as an airport
- it will bring thousands of jobs
- Baginton village should be protected from additional traffic.
- will bring much needed skills and investment to region.
- it is crucial for future of car industry
- green belt land would not be lost, making use of brownfield site
- near to excellent transport links
- logistically positioned for supply chain
- would enhance existing battery technologies
- supports government's carbon reduction targets
- without sufficient battery production and recycling facilities, automotive manufacturers are likely to move production of electric vehicles overseas
- application is a critical step in anchoring the electrification supply chain in the UK, generating at least 4,500 jobs locally, as well as tens of thousands more across the supply chain, representing an investment of up to £2bn in the West Midlands.
- if the gigafactory is not built to safeguard wider jobs and supply chains, local skilled workers will move abroad
- will reduce carbon footprint
- positive impact on environment

Horiba Mira (describes themselves as "a world class research and development organisation based at MIRA Technology Park Enterprise Zone, one of Europe’s fastest growing automotive research and development clusters"):

- The advance in development of low carbon technologies within the automotive industry, particularly electrification of vehicles has been a major feature in the recent growth of investment and jobs at the Technology Park
- The presence of a major battery manufacturing gigafactory facility within the Midlands is highly significant to continue regional economic growth particularly in the low carbon R&D and vehicle manufacturing sectors.
- recognise its significance as a catalyst to attract further inward investment and job creation within Coventry and Warwickshire.

1 Neutral:
- support for use of electric vehicles but not at expense of general aviation
- the existing airport has contributed significantly to the local economy
- existing business should be relocated by WDC
- traffic appears to be saturated around the area, additional public transport facilities required
- it will generate significant economic benefits

ASSESSMENT

The main issues relevant to the consideration of this outline application are as follows:

- the principle of development - *loss of the airport and proposed B2 use;*
- whether the proposal constitutes appropriate development in the Green Belt and, if not, whether there are any very special circumstances which would outweigh the harm by reason of inappropriateness and any other harm identified;
- landscape / impact on the character of the area (including trees);
- impact on heritage impacts;
- impact on neighbours;
- major accidents and disasters;
- traffic, parking and highway safety;
- land contamination;
- drainage and flood risk;
- energy efficiency of the development / climate change;
- air quality;
- open space provision;
- S106 obligations;
- cumulative impacts;
- other matters.

Rationale for the Development and the Applicant's Case

The application is accompanied by extensive supporting documentation. This includes an Environmental Statement (ES), various reports, a Planning Statement and a Design & Access Statement.

A high-level overview of the applicant's case is as follows:

Policy: The applicant states that there is a policy environment which at all levels places emphasis on responding to the challenge of climate change and the crucial role of battery production at scale for EV's in supporting this, enabling a shift away from the internal combustion engine. It notes that policy also highlights the importance of battery manufacture in sustaining and expanding the concentration of automotive industry and engineering in Coventry and Warwickshire. It draws attention to the recent UK policy shift, notably influenced by the UK's 'net zero' strategy, which brings forward to **2030 the date at which petrol and diesel car and van sales will cease.** This implicitly recognises that the vast majority of the UK manufactured vehicles are exported and without securing domestic battery production, as EV manufacturing increases to the detriment of non-EV manufacture then **existing automotive jobs and production would be at increased risk of being lost to the UK**.

Need and Timing: The applicant explains that projections all point toward rapid, substantial and sustained growth in the battery market. In particular, they draw attention to the period through to 2030 as being critical for the UK to respond both in terms of its market positioning and in meeting climate change commitments. It notes that the sector must develop rapidly from a very low base where in the UK there is currently no battery production at real scale. **Given the lead in times for large scale production facilities it is essential that action is taken now if the UK is to avoid being left behind in global markets and jeopardising its automotive sector**.

Scale: The information submitted identifies a global trend towards larger facilities driven by factors around economies of scale, delivering greater volume to respond to policy drivers for an accelerated transition to EV, accommodating multiple production lines for different products, and collocation with vehicle production and supply chains.

Location: The locational drivers for gigafactory sites are identified as including proximity to battery customers (principally automotive manufacturers), cost and availability of power (including potential for renewables), access to a skilled labour force, good quality transport infrastructure, proximity to innovation infrastructure, and access to materials.

The Coventry Airport Site: Sites with the most comprehensive blend of the locational drivers are identified as having the greatest advantages in terms of accommodating a gigafactory. In this case, the key strengths of the site are identified as including proximity and accessibility to the UK's largest automotive manufactures and also research and development operations, plus other vehicle and transport equipment manufacturers, a central and well-connected location in the UK, the potential to establish a battery supply chain hub, the local presence of a large and skilled workforce, the local presence of a leading research and innovation capability including for example at the universities and UKBIC, and excellent transport infrastructure. The information submitted considers that these significant strengths, allied with the ability to progress development quickly, contribute to creating a compelling case for moving forward at the site. There is the potential of creating a UK centre of excellence in this location which will consolidate UK automotive production as EV production displaces non-EV vehicle manufacture.

Benefits: The information from the applicant identifies a series of benefits to be derived from the scheme including:

- Construction: 2,500 construction worker positions to build and fit out, plus supply chain opportunities, investment in infrastructure, and the potential for significant training and skills development.
- Economy: 6,000 jobs created in the fully operational gigafactory (with 70% of those living in Warwick, Coventry and Rugby), 7,700 indirect jobs supported across the region, 3,400 jobs supported in household goods and services businesses, and £434 million GVA per annum. Most critically, securing UK automotive production and jobs as EV vehicle production rapidly displaces non-EV production over the next decade and beyond.
- Generally: Generation of business rates and social value, encouraging new investment, and establishing the area as a hub for battery technology and production.

The report endorses the implementation of an Employment and Skills Plan to maximise the jobs and training benefits for the area, and leveraging the benefits through working with the construction industry, the academic sector, and the occupier. It notes that the identified benefits are substantial and recommends that action is taken immediately to deliver the gigafactory, establishing Coventry and Warwickshire as the driving force in the development of UK battery manufacturing capacity.

Whilst an end-user has not been formally confirmed, the applicant advises that the scheme has been formulated with a clear understanding of the likely market for such facilities. From detailed commercially confidential discussions which have taken place there, the applicant confirms that is exceptionally strong market interest in bringing the scheme forward quickly should permission be granted.

Independent Assessment of the Applicant's Needs and Benefits Case:

The need for a gigafactory, and for this to be located in the West Midlands, is set out in detail in the 'Economic and Social Benefits of Proposed Gigafactory, Coventry Airport' report produced by Hatch on behalf of the applicant. This report considers four specific elements:

- An immediate need to secure the development of gigafactory scale battery manufacturing capacity in the UK.
- The crucial role that this capacity will play in supporting the UK's vital automotive sector in the transition to electrical vehicle (EV) manufacturing and the wider economic impact associated with it.
- The role that battery manufacturing capacity has to play in safeguarding automotive sector employment in the region, in an area with 44,000 jobs directly and indirectly connected to vehicle production.
- The rationale and necessity for developing gigafactory battery production at the Site, with its associated requirements for large scale buildings and large land areas, if the UK is to secure its share of a rapidly growing global market.

The Hatch report suggests that this is a time critical development. The potential for Coventry Airport to be the location for a 60 GWh pa battery manufacturing

facility would make a major contribution to the UK's competitive position in an industry which is both economically and politically vital to the country's future.

Officers commissioned an independent assessment of the information submitted by the applicant, namely the Hatch report, with the aim of critically assessing the need for, and economic impacts of the proposal. This was carried out by Iceni Projects, a planning consultancy, with specialisms including economics. In providing their response, Iceni Projects also carried out independent research and spoke with a number of key stakeholders regarding the proposal. Officers consider that this provides a key impartial assessment of the information submitted by the applicant.

The findings from Iceni Projects are summarised below:

Policy: **there are clear legislative drivers, led by the need to reduce CO2 emissions, which are driving demand for battery production.** The transition of the automotive sector towards electric vehicles is of greatest significance, but there are other uses including home and grid level static storage, which will generate demand for batteries. EU Rules of Origin mean that for Original Equipment Manufacturers (OEMs) who are manufacturing cars in the UK for export to the EU, battery assembly needs to be taking place within the UK or EU by 2024 and that both cell manufacture and battery assembly (i.e. the battery and its supply chain) need to be taking place in the UK/EU by 2027 if punitive tariffs are to be avoided. **This is a particular factor underpinning the urgency to boost UK EV battery production.**

Need / Scale: The legislative drivers are "ramping up" even further than discussed in the Hatch Report. Whilst there is some short-term uncertainty associated with the curve of demand for batteries, linked particularly to the effects of Brexit and Covid on production in the recent past, they find that the Faraday Institution's forecasts of a need for 140 GWh annual capacity needed in the UK by 2040 is widely endorsed and recognised. They heard from several industry stakeholders that **140 GWh pa capacity may be needed sooner and the 2040 figure could be conservative. There is a clear quantitative need to bring forward additional battery production capacity and a need to broaden the spatial distribution of battery manufacturing capacity (as batteries are heavy and costly to transport).**

Iceni Projects find that **accelerating the delivery of gigafactories to be of national economic significance.** With a shift towards EVs, **if battery production capacity is not increased – and in the immediate term – the UK car industry could be seriously damaged and gradually cease to be a manufacturer of vehicles at scale.** In an international race to secure investment in new EV production, **a failure to develop domestic battery production capacity may well result in mass manufacturers (OEMs) choosing to relocate some, or all, of their production overseas.** The legislative drivers in particular and implications of EU Rules of Origin mean manufacturers are making decision in the short-term, underpinning the urgency of the need to develop a domestic pipeline of gigafactories. These were conclusions of the House of Lords Science and Technology Select Committee, and are supported by Iceni Project's own research.

Iceni Projects agree with the applicant's assessment that **a failure to deliver battery manufacturing capacity could impact on the size, strength and competitiveness of the UK automotive sector and that within the West Midlands region**. If gigafactory investment were to go to other regions, over time production and the supply chain could follow, which would erode the strength and depth of the region's automotive cluster and that within Coventry and Warwickshire. This is important as it is one of the area's key economic strengths.

Iceni Projects find a strong case for battery recycling, and evidence that forthcoming EU regulations are likely to require this.

Location: Iceni Projects agree with the assessment of locational drivers identified in the Hatch report submitted alongside the application. **It is quite clear that the Coventry Airport site is a very strong and potentially optimum location at which to locate a gigafactory,** in particular given its central location in the country; its proximity to Coventry and Warwick Universities and the UK Battery Industrialisation Centre; and its proximity (given the substantial potential number of jobs) to Coventry and Birmingham as major population centres within which there is a supply of labour with relevant/ transferable skills.

Consideration of Alternative Sites: Whilst there are some questions which arise regarding the specific reasons for discounting some other sites, Iceni Projects find that other allocated / permitted sites which have consent for warehousing/logistics development are likely to be built out for this use and whilst on paper some have land which could accommodate battery production, in reality this is not commercially realistic. This reflects the strength of the B8 warehousing market and land values being generated.

Iceni Projects' analysis of alternative sites does identify some alternative potential candidate locations such as the Hinckley NRFI, EMIP and Radcliffe-on-Soar Power Station sites, all of which are in the East Midlands. The first two of these potential sites are located outside of the Green Belt. However, there is a timing issue – **there is an urgency associated with the need to increase battery production in the UK to support the automotive industry**; there is not an allocation or a worked-up proposal for a gigafactory on these sites. Furthermore there is an issue around the availability of these sites and particularly landowner / developer willingness to make the land available at a competitive value particularly having regard to the higher potential values for strategic B8 for which the allocation/consent of these sites is being pursued. These sites' rail connectivity means that they are particularly suited to meeting B8 warehousing and distribution needs. **In reality therefore, the development of these sites for a gigafactory is unlikely to be realistic.**

Benefits: Iceni Projects find that the **estimate of 6000 jobs once operational is reasonable and could potentially be conservative.** It needs to be borne in mind that these are gross job figures, and in part will compensate for losses in other parts of the sector such as in the production of Internal Combustion Engines – an area in which the region arguably over-performs – but such jobs are evidently likely to reduce with a transition towards electric vehicles (EVs). This transition highlights the need for investment to support the sector and facilitate its transition to producing EVs. The automotive sector is evidently a key

sector strength for both Coventry and Warwickshire and the West Midlands more widely and one therefore for which there is a strong rationale for seeking to protect and nurture. The LEP's representation reinforces that this is an industry which is pivotal to the sub-regional economy. **The risk of erosion over time of the region's competitive advantage in automotive production if battery production is not secured is however clear**. The development of a gigafactory evidently has the potential to support wider investment and growth in the battery supply chain and the strength of the broader automotive sector.

Iceni Projects have also commented on the matter of the proposal being speculative: given OEMs or battery manufacturers are not property developers, they consider that it is not unreasonable to see a proposal for development such as this without a named end user.

Principle of the Development

Proposed Loss of the Airport

There have been a substantial number of public objections to the proposal, many of which express concern regarding the loss of the airfield (amongst other issues). Save Coventry Airport, the UK Civil Aviation Authority Airfield Advisory Team and the All Party Parliamentary Group on General Aviation have objected to the loss of Coventry Airport. They stress the important role which the site plays in the UK network of General Aviation (GA) aerodromes and potential future opportunities which would be available to the airport and its associated businesses. Members of the public criticise the application for a lack of consideration to the General Aviation Strategy and that no consideration is given to aviation in the Local Plan. It is suggested that there would be a loss of highly skilled jobs from the area, and loss of the Air Ambulance resulting in longer response times to emergencies.

Members of the public have also objected to the loss of the airport on the following grounds:

Aviation:
- Coventry is designated a safeguarded civil airport and closure goes against the Government General Aviation Strategy.
- Is not in alignment with the DTI or the DOT Aspirations for aviation for the UK.
- The application is in conflict with CAA Policy (DfT) and is covered within the Civil Aviation's Road Map
- The application is in conflict with the Government Policy for levelling up and directly impacts our business and those of prospective investors.
- Conflict with National Policy as covered within the Ministerial Statement by the Rt Hon Robert Courts MP.
- Substantial increase in online shopping and changes to flight patterns more generally means that substantial increase in air freight and smaller aircraft will follow, which this airport is suited to.
- Failure to recognise significant contribution the airport has made to training future pilots.
- Technology in Aviation and Aerospace is advancing at a pace where Air Mobility and Electrical propulsion technologies will require Airport sites to

facilitate local and national integration. Those regions without the infrastructure will be in real danger of being left behind.

- Premise of the airports requirement that any land sold on the airport must be for aviation activity, which the gigafactory would not be.
- Wellesbourne airfield cannot handle the aviation traffic that was able to use Coventry Airport, and therefore cannot be considered as an alternative, which would mean if Coventry is closed, the West Midlands and the City of Coventry will lose a very valuable asset
- Why could the zero emission airport next to the Ricoh not be sited at this site.
- Land disposals have been completed by Coventry Airport Ltd since acquiring the 150-year lease to operate and develop Coventry Airport capabilities. These land disposals have served to weaken the ability of the Airport to attract new business. Furthermore, many of the existing operators and supporting businesses have been driven away due to the planned systematic / strategic withdrawal of facilities and lack of capital investment by CAL Ltd - Supporting the Rigby Group's interest in real estate developments, Coventry City Council has already approved the development and sale of a significant proportion of the airfield area by CAL. This included the redevelopment of the South Side Airport Terminal, in return for which CAL (the Rigby Group) had agreed to invest around £10M of the profit from the development and sale of the land in order to make the airfield sustainable for the future. The developments took place, but there is no evidence of the re-investment having happened.
- Airline operations in West Midlands region have become wholly concentrated at Birmingham Airport. Consequence was that Coventry has taken much of GA activity, thus developing into a significant GA airfield serving needs of West Midlands and being of national importance.
- Coventry City Council has plans to promote the development of Urban Air Mobility businesses in the area - the loss of the airport would hinder progress in this regard.
- Coventry could be grown and expanded and provide jobs much more quickly than this proposed development. With an additional 1000m of runway, for which there is ample space, why not compete with Birmingham either for passengers or freight? Coventry is better suited, having approaches that have less impact upon dwellings, to take traffic than Birmingham. Add a grass runway to enable GA and commercial to grow together maybe? All of these take a business area that is already providing employment and grow it rather than destroy something that is working to build something with an unquantifiable chance of success.
- The closure (or even the threat of the closure) of Coventry Airport will leave GA operators open to a potential monopoly and will severely affect their ability to continue maintaining their aircraft safely and economically.
- Airport has been constructively run down over the last 3 to 4 years, by selectively removing the excellent facilities that the airport was able to offer by closing down the instrument landing system for both runways, the radar service, the NDB, the DME, and Air Traffic Services along with Fire categories and reducing the airports use by limiting hours and restricting operations to 5 days a week. These punitive actions have caused significant based operators to move away from Coventry, this in turn reduced the substantial contribution that they provided.

Facilities:

- Loss of the airfield as facility for training, air ambulance, runway, fire station, historic value, aviation history.
- Lack of consideration of current flying and engineering activities and what will happen to these.
- Coventry Airport offers specialist aircraft maintenance facilities and an instrument approach which is vital for pilot training and ongoing currency: it is one of the few in the Midlands and South of the country that is available for these purposes.
- Loss of instrument runway, aircraft maintenance companies.
- Some functional length of runway should be retained.
- A runway could be provided on top of the buildings.
- Loss of diversion airport.
- Electrically powered aircraft will be the future, which this site will not be able to benefit from if removed.
- Other airfields are not suitable for relocation.
- The application fails to recognise that based at the airport is one of the largest Maintenance and repair Organisations (MRO`s) in the country employing directly from the West Midlands, competent aircraft technicians.
- Airfields are a tactical necessity to us as citizens of a country that is surrounded by water and Coventry has a superb, large general aviation airfield with an excellent location at the heart of England. It would be extremely resourceful to maintain this site as a strategic tool as it could be used for anything from freight to military use.
- The fewer airfields like Coventry Airport are in the UK, the fewer pilots can be trained and join the airlines.
- Coventry is home to the UK's oldest flying jet aircraft, as well as several air museums which host a variety of extremely rare non-flying British aircraft, some of which do not survive anywhere else - these would be lost if the airport closes.

Economic:

- Loss of jobs and teaching opportunities as a result of the loss of the airfield, and associated loss of livelihood and community.
- Detrimental to strategic transport infrastructure.
- The existing airport provides valuable economic investment locally and nationally towards general aviation.
- Loss of airport would have potentially disastrous economic consequences in medium to long term for Coventry and Warwickshire. There are development projects in process which will transform light aviation over next 5 years (eg drone based aircraft national delivery system / helicopter cargo drone system which need to operate from local / regional airports; air taxis; air bus services; air freight).
- Any financial justification for ceasing to operate the site as an airfield is therefore unreliable and should not be used to support the desire by Coventry City Council and the Rigby Group to cease airfield operations to replace them with a gigafactory.
- Suggestion to install solar panels around runway to generate more income if needed by the airport.

Other:

- The airport is low maintenance and less threat to the local community.

- Social benefits from airport will be lost.
- To protect existing airport users, a producer and exact requirements must be secured before a site choice is finalised.
- Loss of open green space will have detrimental impact on mental health.

Supporters of the proposal state that the airport has commercial proposition is in decline and the area needs to be developed as it has no future as an airport.

Policy Context

It is important to highlight that it is a statutory requirement within the Town and Country Planning Act 1990 when assessing planning applications to have regard to: the provisions of the development plan, so far as material to the application, and any other material considerations.

Paragraph 106(f) of the NPPF states that **planning policies** should recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government's General Aviation Strategy. The aforementioned paragraph is specifically directed at plan making, but **does not refer to decision making**. This means that the Local Plan process and its policies must attach the appropriate level of importance to their airfields, with regard to the General Aviation Strategy.

The Local Plan is silent on any requirement to protect the operation of Coventry Airport. The only direct reference to the airport in the Local Plan is policy TR5 (Safe Operation of Aerodromes). This limits development which would inhibit the safe operation of the civil aerodromes, of which Coventry Airport is one. The policy requires that certain developments are unacceptable unless airport operators have been consulted and have confirmed that the proposals will not inhibit the safety of their operations. Clearly, this policy is only relevant in the context of an operating airport. It is noted that the airfield is listed as a "safeguarded aerodrome" under the Town and Country Planning (safeguarded aerodromes, technical sites and military explosives storage areas) Direction 2016. It is understood that this purpose of the Direction is primarily to ensure that development does not hinder the safe operation of an existing aerodrome, rather than to give any special protection in terms of the retention of the airport. Local Plan policy TR5, Safe Operation of Aerodromes covers this in terms of ensuring that development within the safeguarded areas, as defined on the Policies Map, will not be permitted which inhibits the safe operation of an officially safeguarded civil aerodrome.

The position of the current Local Plan contrasts with the previous Local Plan (Warwick District Local Plan 1996-2011) which included a policy (SSP7) to manage the growth of the airport. That policy was prepared in the context of a time when the use of airport was growing, including by providing low cost scheduled passenger services. The policy included a cap of two million on the number of passenger movements that could be served from a terminal at Airport South.

In adopting the current Local Plan in 2017, which was prepared in the context of the Government's General Aviation Strategy issued in March 2015, the decision was taken not to save or replace this policy. There were no representations made to the current Local Plan in respect of Coventry Airport or its operations. The only references to the airport in representations were made in respect of the adjacent land which was allocated for a sub-regional employment site.

It is worth noting that the concerns of local communities over the operation of the airport (particularly but not only in relation to passenger operations) is well documented and has been a constant theme both in Local Plan preparation in the past and in the consideration of previous planning applications. The need to maintain a balance between supporting activities at, and the growth of, Coventry Airport whilst at the same time recognising the impact of airport operations on the environment and local communities was the main purpose of policy SSP7 in the previous Local Plan. Concerns over potential growth in air traffic was also raised in respect of the planning application for the Coventry & Warwickshire Gateway (subsequently included in the Local Plan as a sub-regional employment allocation (policy DS16)) in 2012. Concerns at the time were raised that the activities on this employment site would increase freight traffic and that restrictions should be imposed on the operations of the airport.

The weight attached to the General Aviation Strategy is therefore limited in regard to the decision making process for this application. That said, it should also be noted that the General Aviation Strategy has four aims. Two of these relate to deregulation and meaningful engagement by government departments, and are not relevant here. The other two are (1) "stimulating employment in GA in terms of how many people are involved and how much they participate", and (2) "supporting infrastructure that is appropriate in its extent, capability and location to deliver a mixed, modern fleet of aircraft flying between appropriately equipped aerodromes across well-defined airspace". Both of these issues are addressed later in this section.

Paragraph 12 of the PPG in relation to Transport Evidence Bases in **Plan Making and Decision Taking** refers to the importance of aviation. It states that:

Aviation makes a significant contribution to economic growth across the country, including in relation to small and medium sized airports and airfields (aerodromes). An aerodrome will form part of a larger network. Local planning authorities should have regard to the extent to which an aerodrome contributes to connectivity outside the authority's own boundaries, working together with other authorities and Local Enterprise Partnerships as required by the National Planning Policy Framework. As well as the National Planning Policy Framework, local planning authorities should have regard to the Aviation Policy Framework, which sets out government policy to allow aviation to continue making a significant contribution (National Planning Policy Framework paragraph 80).

A working or former aerodrome could be put forward for consideration as a site for mixed use development (National Planning Policy Framework paragraph 118) that includes continuing, adapting or restoring aviation services in addition to other uses.

It should be noted that the paragraphs above refer to the 2018 version of the NPPF, not the 2021 version of the NPPF which has been updated, so the relevant paragraph numbers have changed, but are still retained.

Connectivity

The connectivity of an existing aerodrome is clearly an important consideration. Within the Aviation Policy Framework (APF, 2015), aviation connectivity is defined as:

"…a combination of destinations served and frequency of flights: the broader the range of destinations served and the higher the frequency of flights to and from those destinations, the better connected an airport, city or country is. The value of connectivity is affected by other characteristics, such as the relative importance of the destinations served, the cost of accessing them, which is the end-to-end journey time and cost including the price of air travel, and the reliability of the services."

The applicant advises that airport activity began to decline from 2015 due to the lack of success in being able to retain or develop commercial flying at Coventry, despite efforts of the owner. The decision was made in 2018 to restructure the Airport operation from a 'full service' airport (air traffic control, radar, high fire category with associated navigation aids and other equipment) to an operation more attuned to General Aviation.

The applicant was asked to provide a summary of the current operations at the airport, which are as follows:

- Traffic using the airport mainly consists of light aircraft, both fixed wing and helicopters, conducting pleasure flying and flying training. Occasional business jets are handled. Maintenance and Air Ambulance flights also take place. No passenger or freight traffic operates.
- In 2019 there were 31,708 total aircraft movements, of which there were 744 unique aircraft contributing to the 9,914 private movements in that year (the remaining were test and training). Of those private movements, 301 aircraft completed more than one arrival / departure in 2019. The remaining 443 were "one off" users of the facility. This is in comparison with a total number of flights of 74,556 at East Midlands and 109,357 at Birmingham Airports.
- In 2020 Coventry saw 22,477 total aircraft movements. The majority related to test and training which accounted for 20,119 movements, whilst 2,329 movements were of private aircraft. In 2020 just 240 such individual private aircraft used the Airport more than once. Other users included the military with 22 movements, plus Air Transport Operators with 3 movements and 4 local movements (these included for example survey flights and diversions).

Specifically, in terms of connectivity, the applicant advises that in 2019 (i.e. pre pandemic) of the 9,914 private movements:

- 64% were to / from Coventry (so effectively home based round trips)
- 32% were to / from elsewhere in England
- 1% were to / from Wales or Scotland
- 3% were to / from destinations outside mainland Britain (e.g. Channel Islands, Isle of Wight, Ireland, mainland Europe, etc.)

Clearly, the vast majority of private flights were round trips from Coventry Airport, most likely pleasure flights. A third were elsewhere within England, such as business, travel and pleasure flights. On average, the capacity of the private flights was 3.75 people, thus the number of passengers on board is very small. The remainder of the flights outside of the private movements were principally test and training facilities. Members of the public have strongly objected to the loss of the airport on the grounds of the loss of training facilities, however *directly* this element adds very little to the connectivity of Coventry Airport. However, it is noted that the test and training facilities obviously deliver future employees and opportunities within the aviation industry, which *indirectly* adds to connectivity, but not specifically to Coventry Airport itself.

The All Party Parliamentary Group on General Aviation have objected to the proposal, stating that the West Midlands is already under provided with General Aviation airfields. Whether this is the case, the connectivity of this particular airport is of most relevance to this assessment, and the associated impacts of the loss of this airfield. The All Party Parliamentary Group on General Aviation refer to its regional contribution to the West Midlands economy, its continuing engineering heritage, proximity to large urban markets, and the fact that it also benefits from good rail and motorway connectivity which are all benefits of the site.

When considering this in the round and the definition of connectivity set out within the APF, the connectivity of Coventry Airport is notably limited. There were just 297 movements outside of the UK in 2019 (pre pandemic). The vast majority of flights do not directly contribute to the connectivity of Coventry Airport as an airfield. There are no scheduled passenger flights to or from the airport, and there is no realistic prospect to expand the site to provide a passenger terminal of any scale, given the Secretary of State's decision to refuse permission for a passenger terminal in 2007 (W/04/1939), on the basis of noise impacts on nearby residential properties. It is also notable that the Local Plan does not identify the site as strategically important or seek its retention.

Members of the public suggest that technology in Aviation and Aerospace is advancing at a pace where Air Mobility and Electrical propulsion technologies will require Airport sites to facilitate local and national integration. There are suggestions that the regions without the infrastructure will be in real danger of being left behind. However, whilst Officers are in no doubt that there are likely to be advances in aviation, given the existing limited connectivity of the airport identified above, it is not considered that the region would be hindered in this regard if the airport is lost.

Members of the public object on the basis of the loss of a diversion airport. However, the applicant advised that there were no diversion flights in 2019 (pre pandemic) and just four weather diversion flights in 2020. The contribution which the airport makes as a diversion airport is therefore considered to be very limited.

Members of the public also suggest that airfields are a tactical necessity to us as citizens of a country that is surrounded by water. They suggest that it would be extremely resourceful to maintain this site as a strategic tool as it could be used for anything from freight to military use. However, the APF does not reference

military use, thus the site's contribution in this regard is not considered to carry material weight.

Impacts on Businesses

The APF also recognises that "excellent connectivity helps sustain clusters of specialised high-value industries in the UK such as the financial, legal, IT consultancy and business management sectors which are knowledge intensive and increasingly global in operations."

The lease holder of the airport has 23 undertenants which are divided into long leasehold tenants, airside and landside business tenancies, and licences. None of the long leaseholders fall within the proposed development area but those considered airside such as Coventry Flying Club and Airpark have the right to use the Airport, for so long as the Airport remains operational. Airside businesses include two flying schools; an MRO (maintenance, repair and overhaul) business; two groups who park, repair and maintain historic aircraft; the Air Ambulance Service; and Warwickshire Fire and Rescue who store a training device at the Airport. Landside users include three logistics firms, an electrical engineering company, an aerospace design firm, and some coach parking. There are also specialist aircraft maintenance facilities and an instrument approach, which members of the public state is vital for pilot training and ongoing currency: it is one of the few in the Midlands and South of the country that is available for these purposes.

The proposed development would result in the loss of the airport, and the businesses which currently occupy the site on short term leases. It also could well lead to other businesses which are associated with the airport operations, but are not located directly within the site boundaries, but adjacent to them, being lost. Many of the airport associated businesses have objected to the proposal, stating that the development would either significantly damage their businesses, or result in closure entirely. These losses and potential losses must be considered in the planning balance. It should be noted however that Warwickshire Fire and Rescue have not objected to the application, nor have the Air Ambulance Service. The applicant advises that they have offered support, alongside the Growth Hub, in the potential relocation of the Air Ambulance and will continue to offer assistance for their relocation, should the application be approved.

Members of the public state that Coventry is home to the UK's oldest flying jet aircraft, as well as several air museums which host a variety of extremely rare non-flying British aircraft, some of which do not survive anywhere else, which would be lost if the airport closes. However, the Midland Air Museum is located outside of the red line site boundary, so does not form part of the development site. There has been no representation on behalf of the Air Museum received regarding the application.

Economic Impacts

The APF goes on to state that the "UK's continued economic success depends on being able to connect with the countries and locations that are of most benefit to our economy. This is important in relation both to destinations that fall into that

category today and those locations that will become crucial to our country's economic success in the future. While it remains vital for the UK to maintain its connectivity with established markets such as the USA and in Europe, it is also important that we take advantage of the growing opportunities presented in the emerging economies of the world to remain competitive in the global economy."

Clearly, the very limited connectivity of the site outside of the UK adds very little to the economic benefits derived from the airport in terms of connectivity.

The main long term objective of the APF is "to ensure that the UK's air links continue to make it one of the best connected countries in the world. This includes increasing our links to emerging markets so that the UK can compete successfully for economic growth opportunities."

Given that Coventry Airport has extremely limited connectivity outside of the UK, and certainly not to emerging markets, it is not considered that its closure would prejudice this aim.

Paragraph 1.86 of the APF states that "Across the UK there is a network of aerodromes of varying sizes, from airports in Northern Ireland, Scotland, Wales and regional airports in England to small business and general aviation (GA) airfields into which GA aircraft can readily gain access. While almost all of these are privately owned and operated, maintaining access to such a national network is vital to the continuing success of the sector."

Whilst there is clearly a protection of the network as a whole, the APF does not preclude individual airfields from closure. Importantly, the APF identifies that "where a planning application is made that is likely to have an impact on an existing aerodrome's operations, the economic benefit of the aerodrome and its value to the overall aerodrome network as well the economic benefits of the development will be considered as part of the application process. However, these benefits will be balanced against all other considerations. This is also something which could be considered by airport consultative committees (ACCs) where appropriate".

This clearly sets out broad considerations for assessing the impact of the loss of an aerodrome i.e. that the economic benefits and value which the airport provides to the network need to be weighed against the benefits of the proposed development, including the potential economic benefits. Members of the public suggest that the existing airport provides valuable economic investment locally and nationally towards general aviation. They also suggest that the loss of airport would have potentially disastrous economic consequences in the medium to long term for Coventry and Warwickshire.

The Environmental Statement notes that there are estimated to be up to 103 jobs within the application site boundary, and a further 93 within the wider Airport estate but outside the site boundary, meaning a potential loss of a total of 196 jobs.

The applicant also provides the following information:

- *Some of these positions would very likely be lost (or at best transferred out of the area) because they are within the site boundary or are very closely related to or rely on the operation of this Airport.*
- *Some affected occupiers have no reliance on the operation of the Airport and are capable of operating in alternative accommodation elsewhere in the area.*
- *Other businesses have already confirmed they have arrangements in place to relocate.*
- *Other businesses still have previously indicated they planned to move on in any event, irrespective of the scheme.*

The detailed review of tenants suggests that the actual number of jobs lost might in fact be around 85 at most. This is of course an estimate, but it is considered to be a robust one. It includes, for example, operational staff directly employed by the owner, when in fact opportunities will be sought to provide them with alternative positions elsewhere in the group's activities.

It should also be noted that there are alternative airports within a reasonable distance of the site, which *may* be able to accommodate some of the existing users and businesses occupying or nearby to the site which would be impacted by the development, such as Wellesbourne Mountford, Wolverhampton Business Airport, Cranfield Airport, Turweston Aerodrome, Nottingham Airport, Conington Airfield, Leicester Airport, Sywell Aerodrome, Derby Airfield, Oxford Airport, East Midlands Airport, Sackville Farm Airfield, Gloucester Airport, Tatenhill Airfield, Hinton in the Hedges Airfield, and Birmingham Airport. There has been conflicting information provided in support and in opposition to the application as to whether these sites could accommodate the dispersed businesses, therefore it cannot be assumed that these airfields could accommodate the lost jobs.

The job losses have to be weighed against the proposed economic benefits of the development, and the applicant outlines the following information:

- *An estimated 2,500 construction worker positions to build and fit out the scheme, plus supply chain opportunities, investment in infrastructure to serve the scheme but also upgrade provision for the benefit of other occupiers locally, and the potential for significant training and skills development.*
- *An estimated 6,000 jobs created in the fully operational gigafactory (with 70% of those living in Warwick, Coventry and Rugby), 7,700 indirect jobs supported across the region, 3,400 jobs supported in household goods and services businesses, and £434 million GVA per annum.*
- *Generation of business rates and social value, whilst encouraging new investment.*
- *Support for the region's automotive and advanced engineering industries, together with the associated supply chain, research and development, innovation and education networks, which together will establish the area as a focal point of international importance for battery technology and its applications.*

The economic impacts of the development not coming forwards, notably the impact on and potential loss of the automotive industry in the West Midlands which are outlined above, also are important considerations which carry significant weight.

A simple economic comparison between the existing and proposed use is to consider the gross value added per annum in terms of employment benefits: the proposed development has the potential annual Gross Value Added (GVA) of up to £434 million based on GVA per job. This reflects the comparatively high levels of GVA delivered by the advanced manufacturing and chemical engineering sectors, with a GVA per job figure of around £73,000. At the end of Phase 1, the facility would be expected to generate £217 million GVA per annum.

This is in comparison to the existing airport, of which the direct GVA generated by businesses operating on the Coventry airport site and in the local area around it is not known, but would amount to £12 million per annum based on GVA per job in transportation and storage sectors. The applicant also noted that turnover from airport operations at Coventry fell by about 75% between 2015 and 2020 (pre-pandemic).

Officers have sought the opinion of the Coventry and Warwickshire Local Enterprise Partnership (CWLEP) on the application, and Coventry City Council in its capacity as the Local Planning Authority, along with Rugby Borough Council as a neighbouring Council, as required by the NPPF.

The CWLEP support the proposed development, suggesting that it is a "vital step in securing the future of manufacturing in our region from automotive to aerospace and cementing our place as a leader in future mobility." It is notable that the CWLEP Strategic Reset Framework (March 2021) makes no reference to the role of Coventry airport in the sub-region. The Outline Implementation Plan accompanying this document refers to the airport only by supporting the redevelopment of the site for the gigafactory as part of "pillar three – a Green Sustainable future" for the sub-region.

There are no policy documents prepared by the West Midlands Combined Authority (WMCA) which refer to the role of Coventry Airport either in terms of how it contributes to the region's connectivity or as part of a national network of general aviation airfields. The WMCA has also supported the application.

Members of the public note that Coventry City Council has plans to promote the development of Urban Air Mobility businesses in the area, and that the loss of the airport would hinder progress in this regard. However, Coventry City Council is the landowner of the site, but in their capacity as the Local Planning Authority also do not object to the loss of the airport.

Rugby Borough Council have commented on the application, and have not objected to the loss of the airport, with their main considerations focusing on the impact of the development on the Green Belt, character of the area, highways and air quality. They do not object to the proposal.

There is considerable support based on the economic benefits which the development would bring, including letters of support from the Members of Parliament for Kenilworth & Southam (the constituency within which the application sits), Rugby, Nuneaton and North Warwickshire.

The Civil Aviation Authority Airfield Advisory Team as an advisory body however, have objected strongly to the loss of the airport. The vast majority of members

of the public who have objected to the proposal object on the grounds of the loss of the airport. They consider that Coventry Airport plays an important role in the UK network of GA aerodromes. Baginton Parish Council state that with so few general aviation airfields remaining in the country, to grant an application for speculative development on Coventry Airport would breach the national guidelines and would destroy a nationally important piece of infrastructure.

Mixed Use Development

The PPG suggests that a *"working or former aerodrome could be put forward for consideration as a site for mixed use development, that includes continuing, adapting or restoring aviation services in addition to other uses."*

This reference in the NPPF is part of a wider section "making effective use of land" and supports making the best use of previously developed (brownfield) land. Given that this is a Green Belt site that is coming forward as a planning application with very specific end use, and not through a Local Plan review proposing to take land out of the Green Belt, then the question as to whether the site could be suitable for a mixed-use development is wholly theoretical, and very special circumstances would need to justify such development. However, the following comments can be made on this point.

- The airport is properly defined as previously developed land.
- Were the airport to come forward through a Local plan process, and were exceptional reasons given to take the land out of the Green Belt, the mix of uses on the land would be determined by the exceptional reasons for taking the land out of the Green Belt in the first place.
- Whilst a mixed-use development is possible, the extent to which any truly mixed-use development could be delivered would be constrained by several factors. These include:-
  - Whether there was an ambition to keep the airport operational. If so, consideration would need to be given to the impact upon the airport's safe operation, and the extent to which any other uses would increase levels of air traffic to unacceptable levels.
  - The site is surrounded on three sides by employment uses; it is estimated that approximately 78% of the site abuts another employment use. In this context a residential led redevelopment of the site would be challenging.
  - There may be issues of soil and groundwater contamination on parts of the site arising from its current and historic use as an airfield which could impact on the viability of some types of a mixed-use scheme.

Opportunities for Future Development

Bodies such as the All Party Parliamentary Group on General Aviation and the UK Civil Aviation Authority Airfield Advisory Team suggest that Coventry Airport is likely to be considered a key part of the Strategic Airfield Network, and note the contribution the airport makes to the West Midlands economy, its continuing engineering heritage, and proximity to large urban markets. The UK Civil Aviation Authority Airfield Advisory Team states that the airport represents one of only a few of our GA aerodromes large enough to accommodate large airliners making it a viable destination of choice for business aviation. It is stated that the current lease holders of the site could expand their business aviation aspirations

and also provide space for aircraft storage. Some members of the public suggest that the site could be used for freight and passenger services. The UK Civil Aviation Authority Airfield Advisory Team state that with unmanned aircraft systems and their various potential applications getting ever closer to commercial reality, Coventry Airport could benefit from its current position and lead the way in testing and development with academia. They suggest that it could become one of the first GA aerodromes to benefit from new inward investment from tech firms and mail order giants that will inevitably seek to diversify and benefit from the opportunities that unmanned aircraft systems (UAS) will present.

Concern has also been raised from various parties regarding the current owner of the site reducing the facilities serving the site and disposing of land, meaning a forced reduction in the number of flights and services.

The applicant has responded to these comments, stating that the accounts show a loss on ordinary activities at Coventry before taxation, from purely aviation activities, of £11.5m, in the period from acquisition by the current owner in 2010 to the end of March 2021. They also note that the UK Civil Aviation Authority Airfield Advisory Team response suggests that activities such as business aviation and aircraft storage might be encouraged at the site. The applicant has responded that the owner already operates an executive jet centre at Birmingham Airport which is a significantly more appealing destination for this type of facility; it is not commercially realistic for them to have a second facility within such close proximity. Aircraft storage (assuming the runway is kept open) would be a limited activity and highly inefficient use of the site.

The applicant advises that the following have been explored to provide a sustainable, viable operation of the airport: seeking the development of more cargo operations; looking at the development of corporate aviation including a private jet centre; efforts to attract additional GA operations (private pilots and organisations); plus aircraft storage (long and short term). The applicant advises that these endeavours have been significant and extensive but ultimately unsuccessful. The applicant confirms that in 2020, in a further effort to manage costs whilst protecting operations and in consultation with operators, the decision was taken to reduce opening hours to 5 days a week (down from 7).

There may well be opportunities to increase the number of flights at the airport or diversify somewhat. Members of the public have suggested there will be advances in aviation in the next five years, facilitating drone based aircraft national delivery system / helicopter cargo drone system which need to operate from local / regional airports; air taxis; air bus services; air freight, which all present opportunities for the airport. However, Officers have doubts, based on the information available that there is a commercially viable and acceptable, in terms of impacts on the existing sensitive noise receptors, to scale up use of the airport in a meaningful way.

Members of the public have queried why could the zero emission airport next to the Ricoh not be sited at this site. Officers have no details of the zero emission airport so cannot offer further comment on this matter.

Members of the public also suggest that the airport is low maintenance and less threat to the local community than the proposed use. However, this is insufficient justification in isolation to retain the use of the airfield, particularly when the applicant claims that there are significant financial losses associated with its running.

Members of the public also suggest that the loss of open green space will have detrimental impact on mental health. However, currently the airport is closed to members of the general public, unless they are using airport facilities. The proposal would increase public access to the site, providing at least 15 hectares of public open space, which would provide health and wellbeing benefits.

There is also a clear direction in the APF to ensure that the aviation sector makes a significant and cost-effective contribution towards reducing global emissions. It is recognised that part of achieving this process will be driven by developing new technology, which amongst other things includes projects to electrify aircraft movements. The proposed development would support this agenda.

Paragraph 81 of the NPPF – building a strong competitive economy

Paragraph 12 of the PPG regarding decision making relating to airfields, referred to above, references paragraph 80 of the NPPF. This was updated within the 2021 NPPF to paragraph 81 and states that,

Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. The approach taken should allow each area to build on its strengths, counter any weaknesses and address the challenges of the future. This is particularly important where Britain can be a global leader in driving innovation, and in areas with high levels of productivity, which should be able to capitalise on their performance and potential.

As identified above, whilst the airport does provide an economic contribution to the local economy, this is somewhat limited, and the ability to expand the airport to be more profitable and provide additional benefits to the economy is also restricted.

As demonstrated above, the gigafactory has potential to substantially increase the economic benefits associated with the site, providing economic gains to the local area and securing the long term future of the manufacturing industry in the West Midlands. These are seen as significant economic benefits. Productivity in terms of the gigafactory owing to its scale and manufacturing capabilities would be substantial. This would allow the area to build on its strengths in terms of the existing automotive sector, and associated research and development facilities, particularly noting the UK Battery Industrialisation Centre nearby to the site. It is noted that this however come at the potential cost of some, or potentially all, of the businesses associated with the airport use.

Notably, paragraph 81 of the NPPF references the Government's Industrial Strategy (2017), which sets out a vision to drive productivity improvements across the UK and identifies a number of Grand Challenges facing all nations, setting out a delivery programme to make the UK a leader in four of these: artificial intelligence and big data; clean growth; future mobility; and catering for an ageing society.

One of the four grand challenges set out within the document is maximising the advantages for UK industry from the global shift to clean growth. Another is being a world leader in shaping the future of mobility. The document recognises that "we owe it to ourselves and future generations to lower carbon emissions and move towards cleaner growth; we are facing a fundamental demographic shift as our population ages; and we are on the cusp of a profound shift in how we move people, goods and services around our towns, cities and countryside."

The document also states that "we want to support our strong automotive, aerospace and construction industries to increase their share of global markets as they shift to clean energy sources and efficient new materials." Clearly the provision of a gigafactory would assist in the national shift of both the automotive and aerospace industries to clean energy sources. Given the lack of connectivity which the airport offers and the significant impact by virtue of the scale of the production of electric vehicle batteries, the site would contribute more as the proposed development to this aim, than the current site does.

The Government's long-term goals are to make clean technologies cost less than high carbon alternatives, and for UK businesses to take the lead in supplying them to global markets. In order to do this, projects such as the gigafactory are *essential* in reducing the cost of electric batteries.

Within the document, the Government confirms that they will publish a strategy on government support for the transition to zero emission road transport, ensuring the UK continues to be a world leader in the development, manufacture and use of these vehicles. Within the subsequent "Road to Zero" (2017) strategy, the Government confirms that it is "committed to putting the UK at the forefront of the design and manufacturing of zero emission vehicles. We want to have one of the best packages of support in the world.." There is a clear desire within this document to deliver largescale battery production facilities within the UK.

There is clearly an ambition to provide clean and autonomous aerial transport, and to build the aerospace economy in terms of the Government's Industrial Strategy. The Government backs the aerospace sector and its strengths in productivity and innovation to secure a share of the growing global market. However, in terms of what Coventry Airport adds to these aspirations, this is considered to be limited. The proposed gigafactory however significantly contributes to the aspirations of the Industrial Strategy (2017), and is considered to help build a strong and competitive economy in terms of the requirements of paragraph 81 of the NPPF.

<u>Conclusion</u>

The proposed development would result in the loss of a general aviation airport, which would also result in the loss of jobs and potential loss of associated businesses. There would be a loss of teaching and training opportunities and aviation history generally, although the air museum falls outside of the red line site plan. Social benefits from the airport would also be lost. However, the airport is considered to provide low levels of connectivity outside the authority's own boundaries and it is not considered that the airport provides a significant contribution to economic growth across the country.

Whilst the loss of existing employment and businesses at the site is extremely regrettable, the proposed development would result in an overall net increase in the direct number of people employed at the site of 5,804 people. This is significant. There would also be a potential overall net increase in GVA per job figure of £422 million. By the end of phase 1, the increase would £205 million in comparison to the existing use. Again this is significant.

The proposed gigafactory would also significantly contribute to the aspirations of the Industrial Strategy (2017), and is considered to help build a strong and competitive economy in terms of the requirements of paragraph 81 of the NPPF. Whilst the current site contributes in this regard, the aforementioned figures show the potential which the proposed development has in economic terms. Moreover, in terms of building a strong economy, importantly, the proposal would secure the car manufacturing industry in the West Midlands. Without the proposed development, the West Midlands is at serious risk of losing this industry altogether.

Members of the public consider that there is a risk of setting a precedent of allowing redevelopment of local airfields if the application were to be approved. However, each application has to be dealt with on its own merits, and this is a very specific development.

Some members of the public request that some functional length of the runway is retained. However, this would not be possible owing to the required scale of the development. Members of the public suggest that a runway could be located on top of the buildings. However, Officers doubt that practically this is achievable and notwithstanding this, the building will be different heights, thus making it impossible.

For these reasons, Officers consider that, owing to the significant economic benefits which would be associated with the proposed development, and implications of the proposal not coming forwards, that the loss of the airport is acceptable in principle.

Proposed Use of the Site for B2 Purposes

B2 uses represent employment development. Local Plan policy EC1 states that in rural areas (this site is not located within any of the identified urban areas within the District, so therefore is classed as rural for the purposes of this policy), new employment development will be permitted in the following circumstances:
a) To promote sustainable development in the growth villages
b) For the diversification of agricultural and other land-based rural businesses in accordance with policy EC2

c) Within the major sites identified on the policies map in accordance with policy MS2
d) Within the allocated sub-regional employment site where it provides for sub-regional employment needs in accordance with DS16
e) To support the sustainable growth and expansion of existing rural business and enterprise

In all instances applicants will be required to demonstrate that:
- The proposal would not generate significant traffic movements which would compromise the delivery of wider sustainable transport objectives, including safety, in accordance with TR2
- The design and scale of the proposal would not have a detrimental impact on the landscape and character of the area.

Neighbourhood Plan policy G5 states that development proposals which provide new employment opportunities will be supported provided that they meet the relevant requirements of EC1 and demonstrate regard for residential amenity and the natural environment, with mitigation measures as required. Proposals must also appropriately address highway safety and on-site parking requirements.

The site is not a major site identified under criterion (c). Furthermore, although there is some overlap with the boundaries of the sub-regional employment site identified in policy DS16 (criterion (d)), this only relates to areas of landscaping or where highway works are proposed. It can therefore be concluded that this B2 development is not in accordance with the provisions of this policy. As such, it is a departure from the development plan, including the Neighbourhood Plan in this respect. This is considered within the planning balance and conclusion below.

Whether the proposal constitutes appropriate development in the Green Belt and, if not, whether there are any very special circumstances which would outweigh the harm by reason of inappropriateness and any other harm identified

Baginton Parish Council, Bubbenhall Parish Council, Local Councillors and members of the public have objected to the proposal on the basis of inappropriate development within the Green Belt, and lack of very special circumstances to outweigh the harm. It is stated that the site must remain in the Green Belt regardless of the outcome.

Members of the public have objected on the following grounds:
- Loss of Green Belt land.
- The proposal fails to recognise the overriding value of the openness and permanence of national green belt policy.
- The site is very open when approached from Baginton and should be protected.
- The proposal is contrary to Local Plan policy relating to protecting Green Belt land.
- The site was not included in the sub regional employment site or safeguarded land and was retained as green belt to prevent urban sprawl and protect nearby villages.

- Lack of very special circumstances for development in the Green Belt: cited very special circumstances for Whitley and Gateway projects were not proven, more Green Belt land should not be lost when adjacent land has not been developed in accordance with conditions.
- List of alternatives sites is insufficient - Honiley airfield not included, this site was chosen above others on measures open to bias and was heavily favoured through offer and promotion of the applicant owners.
- Insufficient assessment of visual impacts on the Green Belt.
- Risk of setting harmful precedent.

Supporters of the proposal state the following regarding the proposal (relates to very special circumstances case):
- Will bring much needed skills and investment to region.
- It will bring thousands of jobs.
- It is crucial for future of car industry.
- Green Belt land would not be lost, making use of brownfield site.
- Near to excellent transport links.
- Logistically positioned for supply chain.
- Would enhance existing battery technologies.

The application site is located within the Green Belt. The NPPF regards the construction of new buildings within the Green Belt as inappropriate development, which should not be approved, unless very special circumstances can be demonstrated. The NPPF makes it clear that substantial weight is given to any harm to the Green Belt. It establishes that 'very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations.

In the Green Belt, major sites will be determined in line with Local Plan policy MS2. Whilst this relates more to Honiley Airfield and Stoneleigh Park, the supporting text confirms that development at other major sites will be restricted to limited infilling and redevelopment of previously developed land and will be assessed in accordance with national planning policy.

There are exceptions to inappropriate development within the NPPF, however, the proposal would not meet any of these. Local Plan policy DS18 echoes the requirements of the NPPF in this regard. It therefore must be considered if very special circumstances exist, which outweigh the harm caused by inappropriateness and also to openness, and any other harm identified.

Defining the level of harm

The NPPF states that the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence. Openness as a concept, relates to the absence of built form. The existing site, by virtue of its use as an airfield, is largely open. However, there are some existing buildings serving the site, such as air hangars which provide approximately 16,200 sq m of floorspace. The site also contains other structures such as fencing, lighting and signage, as well as other items, including parked aircraft. The applicant considers that this has an urbanising effect on the existing site, which reduces

openness. The site is surrounded to the north and east by highway infrastructure and commercial development. To the south is Middlemarch Industrial Estate and land being developed for the Gateway South scheme. The west of the site is open, with agricultural land beyond Coventry Road. The applicant considers that the effect on openness will be a localised one, not one that extends to the wider Green Belt.

Officers consider that whilst the site does benefit from some built form, these structures, along with the other paraphernalia associated with the airport activities only occupy a relatively small area of the site as a whole. The proposal would introduce a building of a vastly larger scale, across the majority of the site, where there is currently limited development. Officers therefore consider that the effect on openness is significant in spatial terms. There would also be significantly larger traffic movements to and from the site in comparison to the existing arrangement, including large areas of parking, which would also impact on openness, albeit to a lesser degree than the proposed building.

In visual terms, the application site is on a plateau and relatively exposed. However, as noted by the applicant, the surrounding context of the site is one that is now largely built-up. Certainly, the south west of the site remains open, and rural in character. Views of the site from public vantage points would be impacted. However, owing to the fact that the majority of the rest of the site is now bounded by large scale, commercial development, the views from the south west are viewed against this backdrop. Essentially in visual terms, the proposal infills a large area of open land which sits between extensive built development on nearly all sides. It is noted that the proposed development would be much larger in overall scale and height that the existing neighbouring commercial development.

When viewed from Orchard Retail Park to the north west of the site in Coventry, owing to its elevated position, the site appears open and largely undeveloped. This view would be significantly impacted. Although it should recognised that this is viewed from the context of a retail park, with the strategic highway network separating the two areas.

In conclusion, the proposed development would introduce a significant amount of large scale built development, where largely, there is none. This along with the associated infrastructure required to facilitate the development would have a significant impact on openness in visual, but particularly in spatial terms.

Joint Green Belt Study

Objectors to the proposal, including Bubbenhall Parish Council have referred to the Joint Green Belt Study (JGBS) that was carried out in 2015 for Coventry, Warwick, Nuneaton and Bedworth and Rugby Councils. However, it should be noted that this is perhaps more useful as a tool for deciding on the location of large scale allocations of land for development through the Local Plan process, rather than as a tool for assessing individual sites. Moreover, since the review in 2015, the surrounding context of the site has moved on considerably, with some areas nearby to the site being removed from the Green Belt, via the Local Plan process.

Nevertheless, the JGBS is a material consideration, albeit, that it the weight offered to it regarding the application site and surrounding context is now limited, given the significant changes to the Green Belt since its publication in 2015.

Parcel C9 of the JGBS includes the site, and a parcel of land that wraps around Middlemarch Industrial Estate. It was given a value of 14/20, which was considered as a mid-performing parcel. It is notable that in terms of openness, the report considers that "This land parcel contains significant development associated with Coventry Airport, including the main runway and several large hangars. The air museum near the northern edge of the parcel and adjacent to the Stonebridge Trading Estate is also intrusive development. Together, these developments significantly compromise the openness of the Green Belt." The site also had a lower score in relation the existing urbanising influences, referencing again the impacts of existing built development within the airport. These circumstances have not changed since the JGBS.

The parcel scored highly in relation to the prevention of neighbouring towns merging into one another, noting that it protected Baginton village from the Stonebridge Highway Industrial Estate. What must be considered in regard to this matter is that the Whitley South development has been approved, and part of the Green Belt within this parcel identified in the JBGS was removed between Baginton and the Stonebridge Highway Industrial Estate, with part of the Sub Regional Employment Allocation now positioned between the two. This creates a very different context to that when the JGBS was carried out.

In terms of “preserving the setting and special character of historic towns” and "significance of boundaries / features to contain development and prevent encroachment", this parcel was given a mid-range score. Again because of the effect of new development, the context regarding this matter has significantly changed.

It should be noted that the JGBS scored all land parcels equally highly for the purpose of “assisting in urban regeneration by encouraging the recycling of derelict and other urban land” (i.e. all parcels got the top score for this).

Green Belt Purposes:

Paragraph 138 of the NPPF states that the Green Belt serves five purposes. These will be looked at below.

a) to check the unrestricted sprawl of large built-up areas: The applicant's green belt review concludes that the contribution currently made by the site to this purpose is “Limited to None” as it is very clearly restricted and will be understood as development within the confines of the urban area. Whilst it is more extensive than might habitually be considered to comprise ‘infilling’, in a literal sense that is precisely the effect of the proposals. The applicant suggests that harm to this purpose can be mitigated through the creation of strong Green Infrastructure at the western end of the scheme.

Given that the site is now largely confined by built development, Officers agree that visually, the development is viewed as the infilling of a site already

surrounded by urban development. Given that the site was offered a low score during the JGBS and that the context of the site has vastly changed since this, with more built development surrounding the site, it is considered that the impact of the development would have a low level of harm to this purpose.

b) to prevent neighbouring towns merging into one another: the applicant's green belt review concludes that the contribution currently made by the site to this purpose is "Limited to None", as the scheme does not extend beyond the existing urban edge. There are no neighbouring towns in the relevant (south westerly) direction; the closest are some distance away at Kenilworth, Warwick and Leamington Spa. The applicant's green belt review indicates harm to this purpose can be mitigated through the creation of strong Green Infrastructure at the western end of the scheme and concludes that there will be no harm to this purpose.

The approval of the 'Whitley South' development and notably the UK BIC site has brought the edge of urban development closer to Baginton village, however, there is a landscape buffer which provides some separation. Therefore, whilst the site and parcel of land scored highly under the JGBS in this regard, this function of the parcel has already been compromised. The airport currently benefits from a number of hangars, with a large collection of the buildings being positioned close to Baginton village. Therefore the existing site already brings urban style development within relatively close proximity of the village. Whilst the existing buildings on the site would be removed, this would be replaced with a 75 metre landscape buffer, with bund and mitigation planting to soften the views of the site from the village. It is therefore concluded that there would be limited harm to this purpose.

c) to assist in safeguarding the countryside from encroachment: the applicant concludes that the contribution currently made by the site to this purpose is "Limited to None" and notes that the scheme does not physically encroach into countryside, nor is the site countryside. The applicant acknowledges that there might nonetheless be some limited perception of the countryside being encroached into, but that this can be mitigated through the provision of Green Infrastructure. They conclude that there will be no harm to this purpose.

Officers agree that the site is not read as "countryside", nor would it encroach into countryside areas. Again, given the development which is taking place around the site and the existing development, the site is now read in the context of a largely urbanised area. The JGBS notes that there are no significant defensible boundaries to prevent the encroachment of development from Coventry or Baginton into the countryside, other than the runway, which acts a permanent defensible boundary. However, following approval of Whitley South and Gateway South, the east of Baginton is largely built up, beyond the airport. There would therefore be limited harm to this purpose.

d) to preserve the setting and special character of historic towns: the applicant does not identify any harm in this regard and the applicant concludes that the current contribution of the site to this purpose is "None". The applicant therefore considers that there will be no harm to this purpose.

The JGBS suggested that views of the site from the historic core of Coventry are a contribution of the parcel to the setting of Coventry. The views of the site would now be interrupted both in front and behind the site when viewed from Coventry, by large scale commercial development. It is therefore not considered that there would be harm to this purpose as a result of the proposal.

e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land: the applicant notes that assessments of entire Green Belts tend to adopt an approach whereby the contribution of plots to this purpose is treated as a constant. In this case though, in relation to the development proposed at this site, as discussed below, the analysis submitted with the application shows there are no urban sites, derelict or otherwise, and indeed no other sites generally, capable of accommodating the scheme. There will be no harm to this purpose.

In summary, the proposal will be harmful to the Green Belt by definition. The development will impact on openness in visual and significantly in spatial terms. It would have a limited level of harm to three of the five purposes of including the land within the Green Belt. Substantial weight in the decision-making process must be given to this harm to the Green Belt.

Nevertheless, the NPPF permits such development within the Green Belt if the applicant can demonstrate very special circumstances to clearly outweigh the potential harm by reason of inappropriateness, and any other harm.

Very Special Circumstances Case

The applicant characterises their very special circumstances case as:

- The urgent need for a gigafactory for the production of EV batteries in this location.
- That Coventry Airport is the only site capable of providing for this need, within the required timescales.
- The importance of meeting the need more swiftly than promotion through the Development Plan would allow.
- The extent to which the scheme is supported by policy and policymakers at all levels.
- The benefits of the scheme including in particular economic and sustainability considerations, but also the range of other benefits that would be delivered.
- The negative impacts that would arise if the scheme does not come forward.

Owing to the concerns from the Parish Councils and members of the public regarding the projected employment numbers and whether they are reliable, and also owing to the specialist nature of this work, as detailed above, a thorough and detailed assessment of the applicant's very special circumstances case was undertaken by an independent planning consultant, Iceni Projects. This is discussed below.

<u>Need</u>

Various objections state that the scale of development is not justified: the output of the proposed gigafactory is to be 60GWh per annum, three times that of other

such factories under consideration elsewhere in the country and in Europe. They state that recent analysis suggests that 7 factories, each producing 20 GWh per annum, would meet the nation's requirements by 2040.

However, Iceni Projects findings agree that there is an urgent need to deliver a gigafactory in order to achieve carbon neutrality in the UK by 2050, and to specifically address the banning of the sale of new petrol and diesel cars by 2030. Iceni Projects have also confirmed that a gigafactory of this scale is also required to address these demands. As detailed above, legislative drivers are "ramping up" even further than identified by the applicant. Whilst there is some short-term uncertainty associated with the curve of demand for batteries, linked particularly to the effects of Brexit and Covid on production in the recent past, Iceni Projects find that the Faraday Institution's forecasts of a need for 140 GWh annual capacity in the UK by 2040 is widely endorsed and recognised. Furthermore, 140 GWh pa capacity may be needed sooner, and the 2040 figure could be conservative. They consider that there is a clear quantitative need to bring forward additional battery production capacity and a need to broaden the spatial distribution of battery manufacturing capacity (as batteries are heavy and costly to transport).

A member of the public suggests that it would seem that it has no central government support other than the business secretary taking part in a West Midland Mayor's electoral video. They consider that this is just a back door way of allowing the site to be developed for other purposes. Based on the detailed evidence available, Officers strongly disagree with the claim that there is no central support for the proposal. As detailed above, there is a clear Government agenda to address the climate change emergency, through the delivery of alternatives to fossil fuels and to significantly increase the production of EV batteries. Any alternative uses for the site would be subject to the same level of scrutiny through the planning process.

Location

Iceni Projects confirm that Coventry Airport site is a very strong and potentially optimum location at which to locate a gigafactory, in particular given its central location in the country; its proximity to Coventry and Warwick Universities and the UK Battery Industrialisation Centre; and its proximity (given the substantial potential number of jobs) to Coventry and Birmingham as major population centres within which there is a supply of labour with relevant/ transferable skills; and the availability of power.

Baginton Parish Council have concerns that there would be insufficient power supply. However, the applicant has confirmed that there would be sufficient power supply at the site. This matter is discussed in more detail below.

The All Party Parliamentary Group on GA suggest that the rationale that the site is located nearby to car manufacturers is not supported by the facts. Bubbenhall Parish Council raise similar concerns. However, Officers disagree with this statement, and Iceni Projects confirm that the site is located within relatively close proximity of mass production plants, such as JLR, Aston Martin Lagonda and Geely/LEVC. Iceni Projects also highlight the central location supporting

access to wider manufacturers in multiple directions such as BMW Oxford, JLR Halewood etc.

Members of the public suggest that the development would be better suited in an industrial area, and that there are other sites available which are closer to where the product is being used. However, as identified within the supporting information, there are no other sites which can accommodate the proposed development.

Members of the public suggest that the site is too small for a gigafactory, with no room to expand. However, the site has been specifically chosen to accommodate the projected required size of the gigafactory, which has been calculated on a needs basis. The CWLEP state that sites need to be large, strategically located for transport links, and have access to renewable energy. They consider that the planning application is crucial as it is the optimal site to meet these requirements coupled with very close proximity to UKBIC. It is also a site served by two world-class universities in Coventry and Warwick and three leading Further Education colleges all developing an electrification skills curriculum and apprenticeship provision including WCG, NWHSLC, and Coventry College.

Members of the public consider that the potential occupiers listed in the supporting information already have ties to battery manufacturers, so the development will not be required. However, as demonstrated above, the development has been identified on a needs basis.

Baginton Parish Council consider that the airport site has no direct access to the motorway network and no rail link and looks inadequate when compared to e.g. a Tesla gigafactory in Bridgwater that would have a site road linking directly to junction 23 of the M5 as well as purpose built on-site freight and passenger rail terminals. Whilst the site does not have direct access to the motorway network, it does have direct access to the strategic road network. Moreover, the Iceni report considered the lack of direct access to a rail network not to be a concern. They state that rail freight is effective at transporting bulk cargoes; or large volumes of goods between specific points (such as from East Coast Ports to rail terminals in the Midlands). Battery manufacture does not rely on the bulk flows of individual materials. The potential for transport of the end product (cells, battery packs or modules) by rail would also currently be influenced by production scale, whether manufacturing sites have rail access and facilities for storage. The picture with car manufacturing plants currently is mixed. Iceni Projects understand that JLR Halewood and BMW Oxford have rail access, but other major plants do not, thus demonstrating that a link to the rail network not being essential.

Baginton Parish Council note that the applicant considers that a key strength for the site is its proximity to companies involved in battery innovation and research and development. They state that over the last 18 months, companies have adapted the way they operate due to the COVID restrictions and have shown that they do not have to be physically near to each other to interact effectively. However, whilst the pandemic has changed the ways in which many industries work, this would not preclude benefits from having a cluster of similar

technologies located in the same region, which is likely to generate future research and development opportunities.

Alternative Sites

Iceni Projects confirm that the applicant's 'Consideration of Alternatives Report' has been comprehensive in its identification of potential alternative sites. They note that whilst some sites which do not yet have planning consent and fall outside of the Green Belt might be alternative candidates, consideration needs to be given to what these sites are currently being promoted for. Sites such as EMIP or the Hinckley NRFI site are being promoted for strategic B8 development; and their potential rail accessibility makes them particularly attractive for this use. However, given the land values associated with B8 development, it is unlikely that a gigafactory would be economically favourable on such sites. The potential timescales for bringing forward alternative sites is also an important consideration having regard to the urgency associated with increasing battery production. Fundamentally they conclude there is a lack of readily-available large sites in the Midlands which are capable of accommodating a major manufacturing investment.

Members of the public consider that the list of alternatives sites is contradictory and insufficient, because for example, Honiley airfield is not included. However, Honiley airport is an 80 hectare site, which is not big enough to accommodate the gigafactory. Furthermore, JLR currently occupy it.

Bubbenhall Parish Council suggest that there are several alternative sites including West Midlands Central, Northampton Gateway, Rail Central and DIRFT III, some with planning permission, which are suitable for a gigafactory. They state that other regional airfields/airports have been discounted because they are 'operational', but Coventry airport is also operational. Whilst Coventry Airport is operational, it is nonetheless available for the development, because of the fact that Coventry Airport is unique in the way the tenant leases are set up on short term basis. In comparison, other sites were not available on the basis that they are operational and tied into long term leases, thus not available for development. The Iceni report considered West Midlands Central (understood to be 'West Midlands Interchange' within the report), Northampton Gateway, Rail Central and DIRFT III, concluding all of the sites are unlikely to be suitable for the proposed development for a number of reasons.

Urgency

Iceni Projects have confirmed that regarding the matter of the timing of the development, the evidence they have found does point towards a significant urgency to increase battery manufacturing capacity in the UK having regard in particular to the implications of the EU Rules of Origin on car manufacturing from 2027, the decisions which automotive manufacturers are making short-term regarding where future EV production takes place, and the wider imperative to reduce carbon emissions to moderate growth in global temperatures.

For this reason, the applicant was unable to delay the submission of the application until the Local Plan examination and potential to release the land from the Green Belt.

Members of the public query that the gigafactory may be obsolete when hydrogen powered cars become more widely produced. Baginton Parish Council suggest that technology has moved on and many manufacturers are investing in hydrogen cell technology as their preferred way forward. However the Iceni Projects report confirms that it seems clear that key policy changes and levers are driving the shift towards electric vehicles.

Benefits of the Proposal and Negative Impacts if not Delivered

In terms of the economic benefits, Iceni Projects confirm that the applicant's projection that 6000 jobs would be created on the site through full delivery of the proposals, with potentially 7,700 in the wider supply chain is based on credible data and assumptions, but invariably there is some uncertainty associated with employment numbers particularly for developments such as this where there are few direct comparables. They identify greater potential for these figures to be cautious than overly optimistic.

Iceni Projects also state that the job creation as a result of the proposal will provide the potential to help secure the future of the mass automotive manufacturing in the region, with much wider implications on employment. The automotive sector influences around 44,000 jobs across Coventry and Warwickshire. A key finding is that the need to increase battery production capabilities in the UK is of national significance in economic terms and in terms of the UK's ability to reach the goal of net zero greenhouse gas emissions by 2050. The Iceni Report confirms that there is a case for investment in the sub-region to maintain employment opportunities in the automotive sector and the strength of the automotive cluster. They reference the House of Lords Science and Technology Select Committee's 'Battery Strategy goes flat' Report (2021), which found that, following an independent inquiry, the UK's current trajectory of battery manufacturing is insufficient to support the industry's transition to electric vehicles to meet our net zero commitment; and that despite recent announcements, and there was a real risk of automotive manufacturing moving overseas.

The CWLEP support this stance, suggesting that without sufficient battery production and recycling facilities, automotive manufacturers are likely to move production of electric vehicles overseas and that the application is a critical step in anchoring the electrification supply chain in the UK, generating at least 4,500 jobs locally, as well as tens of thousands more across the supply chain, representing an investment of up to £2bn in the West Midlands. The CWLEP conclude that if the gigafactory is not built to safeguard wider jobs and supply chains, local skilled workers will move abroad.

Conclusion

To be clear on the matter of whether the site will be retained within the Green Belt - the site cannot be removed from the Green Belt through a planning application. The only process by which a site can be removed from the Green Belt is through the Local Plan process. Therefore, if the application is approved, the site remains within the Green Belt.

Officers consider that the information provided by the applicant, and the independent assessment of these details provide a clear and compelling case as very special circumstances. There is clearly an urgent and real need to deliver a gigafactory, in this specific location to ensure that the automotive industry is sustained beyond 2030. Without the development, the lack of provision of a gigafactory for the manufacturing of EVs could have significant detrimental consequences. Moreover, the applicant has been able to adequately demonstrate that this is the only site available within a suitable area, within the timescales required to address the urgent need identified.

The weight offered to the impact on the Green Belt is substantial; there would be an impact on openness in terms of the proposed built form, and the development is inappropriate by definition. However, the benefits of the proposal, and impacts of not delivering the development within the required timescales are substantial and compelling. They are considered to outweigh the harm to the Green Belt identified above. Whether they outweigh "any other harm" is discussed within the concluding section below.

Members of the public suggest that once approved, a further planning application will be submitted, for the construction of other buildings, such as warehousing. This is based on information taken from a Coventry City Council Cabinet meeting February in 2021, which approved the joint venture, which states that it is to promote the Coventry Airport site for a use as a gigafactory or employment led commercial development.

However, in regards to these comments, given the very strong economic case which the applicant presents, which is considered to be site specific and unique, there are two matters to be considered. One is that the permission and its use will need to be specifically controlled through the S106 agreement, because any permission will need to relate to the very special circumstances under which it would be granted. And the second is that any proposal for this site would need to demonstrate very special circumstances for employment development.

Landscape / Impact on the Character of the Area

Policy BE1 of the Warwick District Local Plan (2011-2029) seeks to ensure that development proposals achieve a high quality design. Local Plan policy NE4 identifies that new development will be permitted that positively contributes to landscape character. Proposals must demonstrate that they integrate into the landscape, and consider the existing context, relate well to the local typography and built form. Proposals must identify the likely visual impacts and conserve or enhance important landscape features, amongst other requirements. Proposals must be sensitive to an area’s capacity to change, acknowledge cumulative effects and guard against the potential for coalescence between existing settlements.

Neighbourhood Plan policy G1 states that development proposals should include landscaping schemes which aim to protect and enhance the distinctive rural landscape character. Policy G1 sets out principles regarding hedgerow and tree retention in order to achieve this. Policy BAG3 of the Neighbourhood Plan mainly relates to development directly within the village of Baginton, but however does

refer to the impacts of new development on key views within the village and use of appropriate scale, materials and landscaping, amongst other considerations.

Neighbourhood Plan policy BUB2 largely relates to development directly within the village of Bubbenhall, but also refers to the impacts of new development on key views within the village and use of appropriate scale, materials and landscaping, amongst other considerations.

The CPRE states that study area for LVIA under-estimates impacts, and that the landscape impacts would be far more widespread and damaging. They suggest that there is a lack of assessment from key visual locations and a lack of justification of the assertions within the LVIA.

Objectors to the proposal have the following comments:
- It will be an eyesore.
- Overbearing.
- Out of character with the area.
- Poor design.
- Projected building size and heights will not respect surrounding buildings in terms of height, scale, form and massing.
- The green space provided by the airfield at the moment is now the sole remaining open space factor breaking up the monstrous developments known as the gateway project, especially once the housing developments are established on the newly approved land opposite the airport.
- Footprint and height are too large in rural landscape.
- Suggestion that not including the recycling facility would reduce the footprint considerably.

The applicant informs that the original proposals have been amended and improved through various iterations to reflect information pertaining to site constraints that were identified during the EIA process. As far as possible, potential significant adverse environmental impacts have been 'designed out' of the proposed development. For example, the development zones have been located as far to the east and north as can feasibly be accommodated within the site boundaries, to ensure the maximum landscape buffer possible can be achieved on the western boundary adjacent to the village of Baginton.

The village of Baginton is situated to the immediate north-west of the application site. Bubbenhall to the south retains a rural character, although this will be altered by the construction of the Gateway South development south of the site. The surrounding area around the airport has undergone considerable change over recent years. The site is now nearly land locked by commercial/industrial/employment development, save for Baginton Village, and it is noted that even this context is likely to change in the relatively close future, with the addition of approximately 80 dwellings to an allocated housing site to the west, further reducing the extent of rural fields and sense of openness. Notwithstanding the nearby development within the immediate context, it is understood that the proposed building would be several stories high, and *significantly* greater in scale than any of the neighbouring development. A number of Public Rights of Way extend through the area, particularly along the river valleys, including the Centenary Way, Coventry Way and Shakespeare's Avon Way, which passes through Bubbenhall.

The applicant provides the following information on the proposal:

The ES finds residual landscape effects to be generally positive, due to the significant increase in Green Infrastructure being provided as part of the Scheme. Some beneficial effects were assessed on the character and setting of Baginton, with minor beneficial effects on the local landscape character and the character of the Site. Some beneficial effects were assessed on users of Bubbenhall and Rowley Road due to the increase of trees and vegetation along the roads, and the reduction in views towards the existing development from Bubbenhall Road in particular. Negligible beneficial effects will be experienced by workers of Middlemarch Business Park and Stonebridge Trading Estate due to the increase in vegetation in available views.

Some adverse effects will nonetheless remain on the views experienced by residents of Baginton and by walkers on the public right of way around Bubbenhall. Some adverse effects were assessed on residents of Whitley and on walkers south of Baginton. None of these adverse impacts was found to be significant. The ES also notes that the effect on the openness of the Site as perceived within the wider landscape will be limited, and capable of mitigation over time.

The Parameters Plan identifies at least 35.3ha of land within the Site which will be dedicated to landscaping, SuDS features and infrastructure. The Illustrative Masterplan included within the Design and Access Statement includes approximately 29.2ha of publicly accessible, well-designed multifunctional open space. In circumstances where the Site is currently spartan, performs no wider open space functions, and is inaccessible with no public leisure or recreation offer, the significant potential in this regard represents an important benefit of the Scheme.

The key landscape proposals from the applicant are as follows:

- The protection and enhancement of existing trees which are to be retained;
- The creation of new areas of Green-Blue Infrastructure, including publicly accessible new open space, woodland and open woodland planting, meadow grassland, education landscapes, Sustainable Drainage Systems (SuDS) and wildlife habitat, particularly on the western and north-eastern areas;
- The use of native species where appropriate in order to maximise the opportunities to contribute to local landscape character, reinstate green infrastructure and wildlife habitat opportunities; and
- Areas of bunding and woodland planting along the western and northwestern boundaries to reduce views from Baginton.

Assessment

Coventry Airport is located on a relatively high section of plateau between the Avon and Sowe valleys and its topography and associated large scale infrastructure is visually prominent in much of the surrounding landscape. To enable the construction of the proposed development, the site would be cleared and levelled including demolition of all existing buildings and structures within the application boundary. However as the application is for outline planning

permission, no detailed design information is available at this stage. An indicative parameters plan and indicative visualisations, along with the submission of a Landscape Visual Impact Assessment (LVIA) and other supporting information provide the basis of this part of the assessment.

WCC Landscape note that the extensive area of grassland and overall lack of tree cover create an impression of openness and green space, particularly in views from the edge of the village of Baginton towards the western part of the site. WCC Landscape highlight that Paragraph 8.12 of the Considerations for Sustainable Landscape Planning report (2012) commented that the local area has pockets of attractive, historically interesting landscape and this is still evident today: the important historical sites at Baginton; the landscape and ecological assets of the river corridors of the Sowe, Sherbourne and Avon; and amenity and community assets such as golf courses and plant nurseries. Hence there is a need for careful mitigation regarding the construction of very large-scale buildings and road infrastructure, on what is a relatively high, prominent topography, to minimise compromising the valley landscapes.

What should be however noted is that this report was published prior to the approval of the Whitley South and Gateway South applications, so the site context, including the interaction of these areas with Baginton, has changed. Moreover, the site itself is not considered to be a historically important site in terms of the context of landscape character. Officers however recognise that an important part of the proposal will be to ensure that views from sensitive areas are protected.

WCC Landscape comment that the application site is within the Dunsmore Plateau Farmlands landscape type, identified within the Warwickshire Landscape Guidelines (WLG), since it forms part of the plateau summit and to a large extent has retained its open character. It is a distinctive landscape because of the association of the summits of the low glacial plateaux in the region. The almost flat plateau landscape is characterised by a regular geometric pattern of fields and roads reflecting the late enclosure. Large-scale commercial development and infrastructure are not characteristics of this landscape type. The WLG advocate that built development should be "*carefully controlled and well-integrated in the landscape"*. Although woodland planting could enhance the landscape character the priority should be to maintain the open character of the summits.

Whilst Officers agree that the site falls within the Dunsmore Plateau Farmlands landscape type, Officers do not consider that it falls within the traditional landscape characterisation of this area, as it is not "regular geometric pattern of fields and roads" - it is a large area which forms an airport, and neither do the roads form geometric patterns. The WLG identify the landscape type as a simple, often heavily wooded, farmed landscape, typically confined to low plateau summits, and characterised by sandy soils and remnant healthy vegetation. The WLG identify the following characteristic features of this landscape type: a gently rolling topography of low glacial plateaus; an 'empty' landscape of former waste with few roads and little settlement; a regular geometric field pattern defined by closely cropped hawthorn hedges; many mature hedgerow oaks; large blocks of ancient woodland; a historic land use pattern reflected in the local abundance of 'Heath' names; and remnant healthy vegetation in woodlands and roadside

verges. Whilst there may be small scale features, such as some healthy vegetation and woodland apparent within the site boundaries, it is difficult to say that the site is characteristic of the identified landscape type.

Moreover, as the site is now nearly wholly enclosed by built development, it cannot be said that the immediate context of the site remains historic in terms of landscape character. It is relevant to note that the WLG were published in 1993, well before any of the nearby development had been approved. The application site neither appears to fit within the traditional character found within the Dunsmore Plateau Farmlands landscape type, nor that of the immediate context of commercial development.

WCC Landscape accept that the landscape is neither remote, nor a rural idyll. They state that it is an "ordinary landscape which primarily functions as a green wedge between Baginton and existing commercial development." However, Officers would note that the existing hangars serving the site are positioned immediately adjacent to the boundary next to Baginton, thus the site does not wholly act as a green wedge.

It is recognised however that immediate south west of the application site the landscape is more rural, including agricultural fields bounded by hedgerows and hedgerow trees; isolated farms, dwellings; evidence of restored quarry workings; and woodland. This also forms part of the Plateau Farmlands landscape. This is one of the key areas in terms of landscape impact because of the interface between the site and the open countryside. The development has been designed so that there would be a 75m landscape buffer adjacent to the south western boundary, and the development behind is narrowest at this part of the site, with the maximum building height of 26m. Current views of the site from the rural landscape are open, and the proposal would in-fill this with built development. This however would appear as an extension to the existing commercial development which already creates the backdrop for the site, and would be softened by the proposed landscaping buffer.

WCC Landscape recommended that the landscape mitigation should reflect the specific guidance to Dunsmore and the Plateau Farmlands. For Dunsmore the general guidance for new development is to strengthen the wooded, healthy character of the region; conserve all ancient woodland and restock with locally occurring native species; favour oak planting as major tree species; soften hard built edges through increased tree planting; and, diversify roadside character through soft landscaping. The guidance for the Plateau Farmlands is to maintain and enhance the distinctive historic character of the landscape; conserve historic pattern of large hedged fields; conserve wooded character of mature hedgerow and roadside oaks; restocking of plantation of ancient woodlands; new woodland should be carefully designed to conserve and strengthen open, empty character of the landscape; and, identify opportunities for re-establishing heathland on suitable sites.

Clearly, the guidelines emphasize the importance of strengthening woodland and retaining the historic landscape character. As identified above, the airport and its immediate surrounding context is not considered to fall within the traditional landscape character of geometric patterns of fields and roads. Moreover, there is no ancient woodland which would be affected as a result of the proposed

development. Any oak trees within the site boundary would be protected and retained as part of the proposal, as detailed within the submitted tree report.

Furthermore, the 75 metre landscape buffer, with a landscaped bund helps to soften the development around the more sensitive areas nearby to Baginton village. An existing area of woodland is also shown on the parameters plan to be retained as part of the proposals. These soft landscaping measures, whilst they will not be able to mitigate the impacts of the proposed development entirely in visual terms, do in Officers' view attend to the requirements of the guidance, in terms of softening the hard built edges of the proposal, and enhancing and retaining woodland. It is not considered that the proposal would be harmful to areas of historic landscape character.

WCC Landscape commented that there would be a loss of extensive grassland and with it a loss of the sense of openness and altitude experienced in views from the edge of Baginton. Officers agree with this conclusion, although noting that there would not be loss of grassland in the pastoral sense of the term, rather it is well kept, shortly mown grass associated with the airport use of the site.

WCC Landscape raised concerns that the proposed bund would be punctuated in places by the proposed shared vehicular/pedestrian access points connecting to the new road and any requirements for visibility splays. The landscape buffer would be reduced to 25m wide along the frontage with the Rowley Road which would also be interrupted by two further shared vehicular / pedestrian access points. The buffer would be further reduced to 10m wide along the boundary with Siskin Parkway West (Imperial Park).

The applicant provided further clarification on the points of concern raised by WCC Landscape in the form of additional technical notes, additional viewpoints which had been requested, along with cross sections of the proposed landscaping strip and relationship with existing residential properties.

In their most recent response, WCC Landscape have confirmed that the additional photographic views help to better understand how the proposed scheme would sit within the existing developed area. They now consider that the new building would form part of the existing commercial development and would appear from the sections provided to not significantly rise above this. They also state that the site is situated within a significantly altered landscape of predominantly large-scale commercial units that would be partially screened by extensive bunding and the proposed tree planting. Therefore, they consider that the proposed development would not be read as a standalone development in views from the surrounding area. However, they note that the proposed building will still require a strong landscaped infrastructure, including extensive tree planting, to help it to better assimilate with its surroundings and neighbouring development.

WCC Landscape have requested a limited number of additional cross sections, which are being prepared by the applicant. WCC Landscape also note that while the building cannot be completely mitigated, the development of a strong landscape framework that includes an advance landscape framework would help to reduce visual impacts. They also recommend that given the vast scale of this development, it would be prudent to work in collaboration to help develop the indicative masterplan and design objectives and the production of a Design

Code. The applicants have confirmed that they welcome this request. A further update for members on the final recommendations from WCC Landscape will be provided for members prior to the Committee meeting.

Turning to the Neighbourhood Plan, policy G1 requires that landscaping schemes should protect and enhance the "distinctive rural landscape character". Given that the site is not rural in character and the proposal includes landscaped areas towards the south west of the site, where the traditional rural character commences, it is not considered that there would be direct conflict with this. Furthermore, hedgerows and trees will be enhanced as part of the landscaping proposals.

Moreover, none of the key views identified from Baginton village within the Neighbourhood Plan would be interrupted by the proposed development. Key View 4 from Bubbenhall identified in the Plan, looks towards the application site. A public footpath runs in a similar direction, alongside the River Avon. There are open views across agricultural land towards the application site, with a backdrop of the existing commercial development behind in the far distance.

The applicant states that the proposed development will be visible from comparatively little of Bubbenhall, with the only views likely being those from the PRoW on the northern edge, as reflected in key view 4 in the Neighbourhood Plan. The viewpoint is nearly 2km from the site boundary, and is already characterised by the existing development at Imperial Park and the emerging development at Gateway South. The building will appear above the skyline as illustrated on photomontage but it will be seen in the context of the adjacent development and partially screened behind the intervening woodland.

The ES concludes that no views were possible from the footpath extending along the River Avon, south-east of the Middlemarch Business Park, due to the curvature of the landform and the intervening buildings. The LVIA shows that there are very open views of the site area from Key View 4. However, the Gateway South project already creates a significant intervening feature between the proposed development and the key views. It is recognised that this would nonetheless be impacted as a result of the scale, namely the height of the proposed development.

Conclusions on impact on landscape and character of the area

Clearly the construction of large scale buildings within the main development area would have a significant impact on the landscape character. This will inevitably lead to some degree of landscape harm. The site is currently largely open, however, there are various buildings on the site, and the surrounding context is largely built up with large scale development. Furthermore, although the site is largely open, it is clearly developed, thus not rural in nature. The landscape quality in this context is therefore limited to some extent.

The applicant highlights that the Landscape and Visual ES Chapter acknowledges that the proposed development will be visible from a number of locations, and these have been identified as part of the scoping exercise and are illustrated by Photomontages. However, it is important to note, as set out in the Landscape Officer’s own text, that the building will be seen from the majority of viewpoints

as part of an existing developed skyline, characterised by similar development, albeit at lower heights. Officers agree with these statements.

Regarding comments from members of the public, whilst the development would be taller than the surrounding development, the applicant has demonstrated that the size, including the height of the proposed buildings, are required in order to facilitate the development. Whilst they would be taller, they would sit against the back drop, in the main, of existing commercial and industrial development, which is varied in terms of height and character. Whilst members of the public state that the site is the only area of green space which breaks up the Gateway South and Whitley South development, a comprehensive Community Park will be delivered, along with 15 hectares of public open space on the application site, which provides public access to areas of land which previously were not accessible, and also provides an area of visual relief, which softens the developments.

Based on the submitted information, Officers conclude that the development is likely to have a detrimental impact on landscape character, but given the aforementioned considerations, notably the surrounding context and existing contribution which the site makes to landscape character, that this harm should be offered moderate weight.

Trees

Members of the public have objected on the basis of a loss of trees.

A tree survey was provided with the application. No ancient or veteran trees were identified and there are no ancient woodland designations within influence of the site. There are limited trees within the site given its use as an airport. The runway and surrounding boundaries are largely devoid of trees other than smaller self-seeded shrubs and ornamental plantings. There is an area of woodland present to the north-east of the site which has a high value collective rating together with several high-quality English oak trees. All other tree cover is considered to be of moderate and low arboricultural value, generally representing unremarkable trees which are situated to provide little visual amenity to the wider locality. There are no Tree Preservation Orders.

The potential tree loss requirements to accommodate the development has been assessed based on the proposed maximum parameters, the Illustrative Masterplan and also the emerging strategies for drainage and groundworks. The drainage strategy may require localised tree removal within the higher value woodland, however through sensitive design and implementation this can be mitigated to not affect the overall health and structure of the woodland. The remaining tree removals are insignificant and include trees with limited arboricultural value.

The opportunities for new tree planting as part of the development is expected to provide a substantial future net-gain in tree cover. This is represented within the proposed Green Infrastructure strategy which includes significant new tree planting within large areas of green space at the perimeter of the proposed buildings.

The Tree Officer has been consulted on the application and assessed the above information from the applicant. He has no objection to the proposal and notes that the development is to be located on what is currently the runway or the apron and so the existing peripheral trees are likely to be remote from any direct construction-related impact.

Whilst there will be some tree losses on the margin because of drainage works, the tree report proposes a scheme of protection for those to remain, to be finessed once the detailed designs have been finalised.

The Tree Officer agrees with the applicant's overall summary that, "other tree cover is considered to be of moderate and low arboricultural value, generally representing unremarkable trees which are situated to provide little visual amenity to the wider locality."

The Tree Officer recommends a condition for the provision of an arboricultural method statement, which has been added. Given that there would be an overall net increase in the number of trees serving the site as a result of the development, and any tree removal would be of those which are moderate and low value, Officers have no reason to refuse the application in this regard.

Impact on Heritage Assets

Baginton Parish Council consider that the development would have unacceptable impact on the Baginton Conservation Area, which is contrary to the Neighbourhood Plan. Members of the public consider that the development would have a detrimental impact on the nearby Conservation Area and listed buildings. Members of the public state that the development will completely and irrevocably consign the ancient village of Baginton, with multiple sites of historic interest, and conservation area, to the status of pretty much an industrial estate, swallowed up within the hundreds of hectares of sterile steel building development and industrial premises, changing the character and nature of the village beyond recognition.

Section 72 of the Planning (Listed Buildings and Conservation Areas) 1990 imposes a duty when exercising planning functions to pay special attention to the desirability of preserving or enhancing the character of a Conservation Area. Section 66 of the same Act imposes a duty to have special regard to the desirability of preserving a listed building or its setting when considering whether to grant a planning permission which affects a listed building or its setting.

Paragraph 199 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage assets, the harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Policy HE1 of the Local Plan states that development will not be permitted if it would lead to substantial harm to the significance of a designated heritage asset. Where the development would lead to less than substantial harm to the

significance of a designated heritage asset, this harm will be weighed against the public benefits of the proposal. The explanatory text for HE1 clarifies that in considering applications relating to Conservation Areas, the Council will require that proposals do not have a detrimental effect upon the integrity and character of the building or its setting, or the Conservation Area. Local Plan policy HE2 supports this and states that it is important that development both within and outside a conservation area, including to unlisted buildings, should not adversely affect its setting by impacting on important views and groups of buildings within and beyond the boundary.

The site is located next to Baginton village just outside the eastern boundary of the Conservation Area. There are a number of scheduled monuments and listed buildings located in Baginton. The Conservation Officer considers that it is inevitable that the proposed development will affect the setting of the Conservation Area as a result of proposed built form and massing, intensification of use of the site and potential visual impacts. However, it is highly unlikely that the development proposal will interfere with important views from the historic core of Baginton around Church Street. – arguably the area of highest significance – and specifically the Grade I listed Church of St John.

Although the proposed development could potentially be visible from the southern section of Church Road, any visuals are likely to be limited due to the presence of residential housing on Coventry Road adjacent to the development site. It is also evident that the development proposal affects a less sensitive area of Baginton Conservation Area, the immediate setting of which is now characterised by modern housing.

The Conservation Officer considers that less than substantial harm would be caused to designated heritage assets – principally Baginton Conservation Area – and it is therefore a requirement of local and national planning policy that this harm it outweighed by public benefits. The Conservation Officer concludes that a strong business case has been presented that identifies strong economic and social benefits regionally, and environmental benefits on a national scale – on balance that these benefits outweigh the harm caused to the significance of designated heritage assets in accordance with heritage policies of the NPPF and HE1 of the Local Plan.

Historic England commented on the restricted use of only close-up view points. They expressed concerns that wider views, particularly from designated heritage assets, could be impacted as a result of the development, which had not been considered as part of the information provided by the applicant. Historic England requested a more thorough assessment of the impact of the scheme on the setting of a number of designated heritage assets.

Historic England also note the value of a number of potentially undesignated heritage assets relating to aviation history, as well as archaeological potential within the site.

The applicant has provided additional visualisations and further supporting information regarding the impact which the development would have on heritage assets, which was assessed by Historic England. Historic England considers the level of harm to heritage assets to be less than substantial, but advise that they

are not in a position to confirm the seriousness of that less than substantial harm. They continue to express a desire for a more extended and rigorous assessment of the impact to enable a well-supported view on the level of harm to heritage assets.

Historic England suggest that a 3D model could be used to set the scheme in the wider landscape and enable a more thorough assessment of all the possible visual impacts. However, given that the development is only in outline stage, this is not considered to be reasonable, particularly given that the Conservation Officer has been able to provide a thorough response, based on the available information.

Historic England state that, "We appreciate that the public benefits might be considered as overwhelming when set against what might be seen as relatively minor heritage concerns in the context of this application...". Historic England also conclude that "It is for your authority to assess whether or not the applicants have provided sufficient information justify their view of the heritage impact." Clearly they identify the heritage concerns as "relatively minor", but also direct the final decision to the Local Planning Authority as to whether sufficient information has been provided to fully assess the development.

Following on from this response, the applicant provided an additional technical note relating to heritage matters. Within this, the applicant articulates the methodology and key evidence in relation to the heritage assets which would likely be impacted, and how they concluded that there would be impacts of a minor significance, and at the lower end of less than substantial harm.

This provides specific and detailed analysis of the impacts on Baginton Conservation Area and Stoneleigh. In regards to Stoneleigh Park, the applicant concludes that no adverse effect is considered to occur and its role as the setting of the group of highly designated assets around the Abbey, as well as the ability to appreciate the significance of the park as a whole, is not considered to be harmed, even where glimpsed views of the development are available (and such views already include modern large-scale development). Given the available evidence, Officers concur with this assessment.

The information provided suggests that impacts of the proposal are likely to be limited to the south/eastern, more open part of Baginton Conservation Area, which is not considered to contribute as much to the value of the area as a whole in heritage terms (unlike the historic core of the village, which is considered to be more significant as the setting of the listed church and other structures within that part of the area). Officers agree with this assertion, which is also supported by the Conservation Officer's comments above.

Officers conclude that in relation to designated heritage assets, the benefits of the proposal clearly outweigh the less than substantial harm. Officers consider that the harm is not significant and towards the bottom of the "scale" in terms of less than substantial harm.

Non-designated assets

Paragraph 39 of the PPG states that non-designated heritage assets are buildings, monuments, sites, places, areas or landscapes identified by plan-making bodies as having a degree of heritage significance meriting consideration in planning decisions but which do not meet the criteria for designated heritage assets.

The PPG confirms that a substantial majority of buildings have little or no heritage significance and thus do not constitute heritage assets. Only a minority have enough heritage significance to merit identification as non-designated heritage assets.

Within the supporting information, the applicant has identified six non-designated heritage assets within the site, which are existing aircraft hangars. Members of the public have also referenced items of historic importance within the site. The ES informs that three bellman hangars were constructed in the late 1930s for the RAF Baginton airfield and were the only permanent structures ever constructed to service the fighter squadrons. Bellman hangars, like many wartime structures, were simple and easy to construct thanks to the roll out of uniform designs. The hangars are all steel-framed and have seemingly been little altered since their construction. Only three of the original four hangars survive, however, thanks to their continued operation, all three appear to be in good condition including their door mechanisms.

The applicant considers that the hangars have heritage significance through their historic interest as part of the air defences established during the Second World War with some limited architectural interest. Bellman hangars are still commonplace on historic airfields but are considered to be important assets to the local area, and relatively scarce at the regional level.

The applicant also informs that three T2 Hangars were constructed on the site after the end of the Second World War, although they are structures commonly associated with RAF stations during the conflict. Their simple design meant that they could be erected, and disassembled quickly and easily, and are often found in locations different to where they were originally established as seems to be the case here. The applicant considers that the hangars have heritage significance through their historic interest as part of the air defences established during the Second World War with some limited architectural interest. T2 hangars are still common features on many airfields and, as these post-date the airfield's WWII operational status, are of low heritage significance.

As the structures would be removed entirely to facilitate the development, the applicant proposes in order to mitigate the loss of these structures, a full internal and external record will be made of them prior to demolition, leading to preservation by record. They suggest that the scope and extent of this record will be set out in a Written Scheme of Investigation and agreed in advance with the Conservation Officer for the Local Planning Authority. Within the Planning Statement, the applicant suggests that additionally, consideration might be given to incorporation within the scheme of a permanent reminder of the history of the site, which could be secured by condition.

Historic England in their comments state that within the airport there are a number of assets relating to the aviation history of the site. They suggest that

the Council may wish to consider which, if any, of these meet the criteria to be considered as undesignated heritage assets. Officers have consulted with the Conservation Officer on this matter. The Conservation Officer highlights that n These hangers are common across the country and he notes that the base in Baginton was of relatively small scale compared with larger bases across the West Midlands. The Conservation Officer concludes that the buildings are therefore not of sufficient rarity, uniqueness or historical significance to be considered heritage assets. The Air Ministry specifically designed such hangers to be capable of mass production, with interchangeable parts to permit rapid assembly and dismantling with little permanent foundation. As a result, these buildings are not considered to be of architectural interest.

The Conservation Officer also notes that the airport buildings and its surroundings were not considered to be of sufficient special architectural or historic interest to warrant inclusion within the Baginton Conservation Area, which was designated relatively recently in 2007. Non-designated heritage assets do tend to be included within the boundary of Conservation Areas; with the designated boundary in such close proximity to the Airport, it can therefore be assumed that these buildings were not considered to hold sufficient heritage interest to be considered heritage assets in themselves. Nor were the buildings identified as non-designated heritage assets within the Baginton and Bubbenhall Neighbourhood Plan, or are included on the Council's Local List, which are other mechanisms for identifying these assets, as suggested within paragraph 40 of the PPG.

With these conclusions in mind and following a site visit, Officers agree that the hangars would not be non-designated heritage assets, for the reasons set out. Based on this, it would not be reasonable to include a condition for a record of the buildings to be kept, or a permanent reminder of the history installed at the site. Of course, it is at the applicant's discretion to do this should they wish.

Archaeological Impact

A desk-based assessment, a geophysical survey, and a watching brief (carried out during geotechnical investigations) have been carried out to inform the assessment of the scheme in relation to the historic environment.

WCC Archaeology have commented on the application and note that the proposed development lies within an area of significant archaeological potential, approximately 600m to the south east of The Lunt Roman Fort Scheduled Monument, the earliest phases of which date from the around AD 60-64. Also lying approximately 500m to the west of the proposed development is the site of Baginton Castle and associated remains which is also a Scheduled Monument. The site of a Roman settlement has been identified adjacent to the north western boundary to the site. The site of a cemetery containing Anglo-Saxon cremation and inhumation remains has also previously been identified along the north western boundary to the site.

Initially, WCC Archaeology concluded that the archaeological implications of this proposal could not be adequately assessed on the basis of the available information. The applicant therefore provided a Written Scheme of Investigation which detailed a programme of archaeological trenching, which was approved by

WCC Archaeology. This work was undertaken and the results have been submitted to the County Council for consideration. Members will be updated on this matter prior to the committee meeting.

Impact on Neighbours

Policy BE3 of the Local Plan seeks to ensure that the residential amenities of the occupiers of neighbouring residential properties are not harmed by proposed development.

There are a number of residential properties within relatively close proximity to the site, with the closest being those along Coventry Road, to the west of the site.

Members of the public have objected on the following grounds:
- noise;
- vibration;
- wellbeing;
- loss of privacy;
- loss of light;
- overshadowing;
- lighting from the factory;
- odours;
- combined approved and proposed development is already having a detrimental impact on mental health and physical wellbeing of nearby residents;
- residents have already suffered significant disruption from ongoing works nearby
- loss of rural village community life;
- mitigation measures on existing developments are not adhered to by construction workers;
- the existing, drawn out construction, with its associated noise, dust and disruption to local activity has already taken a toll on village families. For example, the newly built battery research centre makes a constant and disturbing whining noise, the In Transit transport hub produces constant vehicle noise 24 hours, with horns beeping and other unpredictable noises that are impossible to get used to.

The Environmental Health Officer submitted a holding objection, and requested additional information from the applicant regarding the recycling facility which appeared not to have been covered in the ES in detail. Furthermore, the Environmental Health Officer also raised concerns regarding the noise and air quality assessments and reliance on inaccurate modelling information.

The applicant has provided additional information to address these concerns which has been assessed by the Environmental Health Officer. He states that the Environmental Health team are satisfied that whilst the specific processes are unclear at this stage, the battery recycling process is unlikely to result in materially different noise or air quality impacts to the original manufacturing process, as it is likely to involve similar processes to the manufacturing operation. Furthermore they note that the substantial size of the proposed development allows significant scope for moving the Recycling Facility or other

noisy elements of the development away from sensitive receptors if noise or air quality impacts dictate, in addition to other mitigation options.

The Environmental Health Officer therefore accepts that sufficient information has been provided in order to make an informed assessment of this outline planning application.

Built Form

Whilst the built development would be a maximum of 36m, this section of the site as identified on the parameters and maximum heights drawings, is stepped away from the closest neighbours to the site by some distance. The properties along Coventry Road and Oak Close are the nearest residential properties to the development, and would be separated from the built form by a 75 metre landscape buffer, along with a bund of up to 10 metres in height.

By virtue of the distance between the existing properties and the built development, and the intervening features separating them, whilst there would potentially be views of the development from the existing properties, it is not considered that this would be harmful in terms of outlook, natural light or privacy to the extent which would warrant reason for refusal of the application.

Noise / Vibration

The proposed development would introduce a battery manufacturing and recycling facility, with a 24/7 use. There are a large number of existing residential dwellings nearby, west, north-west and north-east of the proposed development that could be adversely affected by operational noise generated from the proposed facility. Noise impacts could arise as a result of operational noise breaking out through the structure or through openings such as loading bay doors, windows and vents. External noise sources could include the operation of fixed plant, as well as the use of forklift trucks, picking machines, and other workplace transport.

The Environmental Health Officer originally raised concerns regarding the lack of modelling of HGV traffic accessing the application site via the relief road associated with the Gateway South development. The Environmental Health Officer states that they would have preferred the assessments to be updated to include the planned transport mitigation measures indicated by the applicant, with the air quality and noise assessments amended to reflect the mitigated transport impacts. However, they acknowledge that the current noise and air quality assessments represent a worst case scenario and no significant effects have been identified.

The applicant has also undertaken an addendum assessment which concludes that road traffic associated with the development on the future Gateway relief road will result in negligible noise impacts at existing noise sensitive receptors. They therefore are satisfied the negligible impacts can be adequately mitigated through a traffic management scheme. This has been requested as a condition from Highways Officers and has been added.

The applicant will also need to ensure that any external plant and equipment installed at the proposed development does not cause noise disturbance to nearby residential dwellings. This can be controlled by condition which has been added.

Lighting

The applicant has completed an initial consideration of the potential for light pollution from the development, and the need for the design of the lighting for the proposed development to minimise obtrusive light. The short summary of the issues references out of date guidance and the updated ILP guidance should be relied upon instead (ILP: Guidance Note 1 for the reduction of obtrusive light 2021). To ensure the lighting impact from the scheme is adequately mitigated at the detailed design stage Environmental Health Officer recommends that a condition is imposed requiring the provision of a lighting strategy, which has been added.

Conclusion

The Environmental Health Officer concludes that they have no objection to the proposed development, subject to conditions, which have been added. Given this conclusion and the assessment that Officers have made about regarding the built form which would be a substantial distance from neighbouring properties, Officers conclude that the development would have an acceptable impact on neighbouring amenity. The proposal is therefore considered to be in accordance with Local Plan policy BE3.

Major Accidents and Disasters

Baginton Parish Council raises concerns regarding the level of detail provided regarding this matter within the ES. They raise particular concerns regarding an inadequate consideration of the major accident hazards, which they consider the likelihood and severity of which has not been assessed or reduced so far as is reasonably practicable, regarding toxic powder release, fires and release of toxic gases, release of flammable vapours and explosion, risk of explosion from dust, flammable gases, natural gases, boilers, and release of chemicals into the watercourse. Bubbenhall Parish Council suggest that there is a risk of fire nearby to residential properties and business park; have concern regarding the use of toxic substances; emission of noxious odours; and that the untested consequences of large scale battery recycling makes the site unsuitable nearby to residential properties.

Members of the public raise the following concerns and comments:
- battery manufacturing requires the use and storage of dangerous chemicals;
- questions safety of building;
- toxic acidic fumes being vented into village;
- requests additional information on long and short terms impacts of the development on health, which should be provided before the application is determined;
- there have been 25 solar farm battery bank fires in the last 2 years, with the most recent taking 3 days to put out;
- risk of fire and serious risk to human health;

- health impacts from additional air pollution;
- lack of information on security and disaster planning;
- environmentally unfriendly processes with dangerous and polluting chemicals used in all processes, and there is a serious risk of fire and toxic pollution, should a fire occur, either in the production stage, but particularly in the environmentally unfriendly battery reclamation process;
- the decision should not be made until an operator is found who can confirm all of the processes required and an assessment can be made on the impacts of these on health and safety.

Paragraph 45 of the NPPF requires that Local planning authorities consult the appropriate bodies when considering applications for the siting of, or changes to, major hazard sites, installations or pipelines, or for development around them.

Paragraph 97 of the NPPF states that planning decisions should promote public safety and take into account wider security and defence requirements by anticipating and addressing possible malicious threats and natural hazards, especially in locations where large numbers of people are expected to congregate. Footnote 43 defines locations where large numbers of people are expected to congregate as transport hubs, night-time economy venues, cinemas and theatres, sports stadia and arenas, shopping centres, health and education establishments, places of worship, hotels and restaurants, visitor attractions and commercial centres.

Paragraph 174 of the NPPF states that decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.

The following potential accidents / disasters are identified by the applicant as low likelihood, but potentially high impact, with comments relating to the level of risk posed:

- surface water flooding - proposed development will include drainage strategy with SUDS to minimise flood risk, therefore no significant adverse effects predicted;
- poor air quality - to reduce the potential for nuisance dust and particulate matter to be generated during construction a best practice dust mitigation plan will be written and implemented for the site. This will set out the practical measures to be incorporated as part of a best working practice scheme. In relation to an increase in harmful gasses, the proposed development will have negligible effects on the assessed existing sensitive receptors in the Opening and Future Years, therefore no significant adverse effects predicted;
- human disease - during both construction and operation of the proposed development employees will follow Government guidance for working safely during coronavirus (COVID-19), therefore no significant adverse effects predicted;
- utilities failure - during the construction phase suitable precautions will be considered in the locations of planned work. Should a utility main be

compromised in any way a contingency plan will be produced, therefore no significant adverse effects predicted;

- transport accidents - there is a potential for effects on highway safety caused by the increase in traffic flow. However, there are no clustering of accidents that would indicate a safety issue with the highway layout. A Travel Plan/TDM Strategy will be prepared for the proposed development with the aim to reduce the number of single occupancy car trips, therefore no significant adverse effects predicted;
- fire and explosions: there is potential for this equipment to catch fire or explode affecting human health and built structures. There is also potential for an increased risk of fire from overheating due to increased fabric efficiency and incorrect implementation. The proposed development will be built to national fire regulations, including the use of linings, materials and finishes that limit the release of heat. Good design will reduce the risk of fire and explosions significantly. The risk is considered to be low, therefore no significant adverse effects predicted;
- employee safety - due to the controlled substances involved in the process there is a risk that human error or negligence could lead to major accident or disaster. This has the potential to have a significant adverse effect on human receptors, specifically employees of the proposed development. Staff and employees will receive necessary training and induction regarding health and safety and technical manufacturing procedures. Should processes evolve further training will be provided, therefore no significant adverse effects predicted;
- malicious attacks - the development could potentially be a target for a terrorist attack. To minimise the risk of an attack, during both construction and operation, the proposed development will follow government security guidelines. therefore no significant adverse effects predicted.

Officers note the potential for the above hazards and accidents, but however agree that they individually pose no significant adverse effects, if properly mitigated through the above measures stated. Given that the Environment Agency, Environmental Health Officer, WCC Highways, the Fire and Safety Rescue Team and Warwickshire Police have raised no concerns to the development in relation to the above matters, Officers have no reason to take a different view.

A significant concern of local residents, the Parish Councils and local Councillors is the potential for chemical and biological contamination. The applicant informs that the construction of the proposed development has the potential to disturb and mobilise existing/residual soil and groundwater contamination; create new migration pathways between sources of contamination and receptors; introduce new sources of contamination such as fuels and oils associated with mechanical plant which may be released to ground via spills or leaks; and generate soil arisings which may not be suitable for reuse within the proposed development or for which there may be no scope for reuse.

Government Guidance confirms that there are three elements to how the planning system deals with preventing and limiting the consequences of major accidents:

- Hazardous substances consent - this is required for the presence of certain quantities of hazardous substances. This is a key part of the controls for

storage and use of hazardous substances which could, in quantities at or above specified limits, present a major off-site risk.

- Dealing with hazardous substances in plan-making - when preparing Local Plans, local planning authorities are required to have regard to the prevention of major accidents and limiting their consequences. They must also consider the long-term need for appropriate distances between hazardous establishments and population or environmentally sensitive areas.
- Handling development proposals around hazardous installations - when considering development proposals around hazardous installations the local planning authority is expected to seek technical advice on the risks presented by major accident hazards affecting people in the surrounding area and the environment.

Operation of the proposed development will introduce bulk storage and use on the site of hazardous and potentially contaminative substances which may be released to ground via spills or leaks or in the event of a major incident.

The applicant advises that the proposed development will be characterised by predominantly building cover and hardstanding which will reduce the potential for surface water infiltration and mobilisation of residual contamination at the site. This will also minimise the potential for generation of soil-derived dust and for users of the proposed development to come into contact with residual contamination.

The applicant also advises that containment bunds or a containment area will also be put in place in addition to an emergency response plan in the event of a major spillage or leak of hazardous waste according to STWL and Environment Agency requirements.

In terms of the controls regarding the storage and use of hazardous materials the following mechanisms would likely be relevant:

• Environmental Permit
• Compliance with the COMAH (Control of Major Accident Hazards) Regulations
• Hazardous Substances Consent

The hazardous substances consent process ensures that necessary measures are taken to prevent major accidents and limit their consequences to people and the environment. This is a key part of the controls for storage and use of hazardous substances which could, in quantities at or above specified limits, present a major off-site risk. The system of hazardous substances consent does not replace requirements under health and safety legislation.

Hazardous substances consent provides control over the presence of hazardous substances, whether or not an associated planning permission is required. Where the presence of a hazardous substance is directly associated with a proposed development, local planning authorities **can** exercise control through the decisions on applications for planning permission.

Separate health and safety law ensures measures are in place for the safe use of hazardous substances. However, even after measures have been taken to prevent major accidents, there will remain the residual risk of an accident which

cannot entirely be eliminated. Hazardous substances consent ensures that this residual risk to people in the vicinity or to the environment is taken into account before a hazardous substance is allowed to be present in a controlled quantity. The extent of this risk will depend upon where and how a hazardous substance is present; and the nature of existing and prospective uses of the application site and its surroundings.

Notably, the PPG states that: where there is development associated with the storage or use of hazardous substances, a separate planning permission may also be necessary. In some cases, an environmental permit may also be required. Dealing with related applications for hazardous substances consent, an environmental permit and for planning permission together should speed up decision making and avoid unnecessary duplication in providing information. In this instance, because the end user has not been identified, and therefore the manufacturing processes and quantities of hazardous substances cannot be confirmed, it is not possible to deal with these matters together. Whilst it can be helpful to deal with the applications together, it is not a statutory requirement.

The PPG states that there may be different considerations, and decisions, for related applications. **It is important that related decisions are not inconsistent (e.g. conditions containing conflicting requirements). To avoid confusion, detailed control over the manner in which a hazardous substance is to be kept or used is best addressed by hazardous substances consent conditions.**

The Health and Safety Executive and Environment Agency are the COMAH competent authority, and are considered "appropriate bodies" in terms of the consultation requirements contained with paragraph 45 of the NPPF. Both of these consultees have confirmed that they have no comments on the current planning application, and that the matter of hazardous substances can be appropriately controlled through the hazardous substances consent application process. Given that the appropriate bodies have confirmed that this is the most appropriate course of action, and considering the direction that the PPG gives in relation to avoiding unnecessary duplication and avoiding confusion, Officers have no reason to go against this advice. The Council's Environmental Health Officer has also stated that it is likely that a hazardous substances consent application and an environmental permit application will be required for the proposal. The potential risks from major accidents and disasters to human health from hazardous substances can be appropriately controlled from the hazardous substances consent application process.

Traffic, Parking and Highway Safety

Bubbenhall Parish Council state that the road network is already at capacity and additional traffic will result in traffic spilling into local villages and impact on amenity of residents. The CPRE state that regarding road traffic, there is a lack of evidence and justification of the traffic modelling data. They state that local roads will not be able to cope with the full impact of HGV movements and will create congestion for residents of local villages. They criticise the failure to address more sustainable forms of transport of products, and state that the traffic assertions within the Environmental Statement are contradictory, making this document unsound.

Members of the public have objected on the following grounds:

- Additional traffic generation and impact on existing traffic congestion.
- Inadequate access.
- Inadequate parking and servicing.
- Traffic delays will have an adverse impact on regional economy.
- Speeding within Baginton village not adequately considered.
- The increased traffic in, and out of, the Coventry airport site, could present even further congestion and delay urgent, critical care.
- Moving raw and production materials to the site - lack of nearby motorway / rail access.
- Consultation with Highways England is flawed - the assessment on pathing does not consider raw materials, as the pathing assessment being conducted is to the M6/M1 corridor and not towards the south west via the M5 where minerals are located. The M40 and M42 are documented both at capacity and there is no real assessment of route for road freight. The pathing does not consider the expansion of Middlemarch, Gateway South or completion of Binley Woods interchange, a limit of 40mph for any form of site surveyors will bring the entire south of Coventry to a standstill topographical, geotechnical and environmental surveys need to be carried out on such a vast site requiring a significant number of engineers and plant, before any form of proper design model can be implemented.

Highway Infrastructure and Traffic Generation

Local Plan policy TR1 states that development will only be permitted that provides safe, suitable and attractive access routes for pedestrians, cyclists, public transport users, emergency vehicles, delivery vehicles, refuse vehicles and other users of motor vehicles.

Local Plan policy TR2 states that all large-scale developments that result in the generation of significant traffic movements should be supported by a Transport Assessment, and where necessary a Travel Plan, to demonstrate the practical and effective measures to be taken to avoid the adverse impacts of traffic. Any development that results in significant negative impacts on the health and wellbeing of people in the area as a result of pollution, noise or vibration caused by traffic generation will not be permitted unless effective mitigation can be achieved. All measures required in the policy should take full account of the cumulative impact of all development proposed in this Plan (and any other known developments) on traffic generation and air quality.

Neighbourhood Plan policy G4 states that development proposals should consider, assess and address their potential to benefit highway safety and in particular examine:

- highway schemes that will improve use by and safety for pedestrians and cyclists;
- public and community transport improvements;
- additional parking provision that could benefit community facilities;
- the impact of traffic flows through village centres.

The A45 and A46 form part of the Strategic Highway Network, providing a key route between Birmingham and Coventry and the M6 and M69. Consultation with National Highways was therefore required.

Proposal:

The applicant advises that to assess the impact of the proposed development on the highway network, modelling has been undertaken. This has included strategic modelling using the Coventry Area Strategic Model (CASM) which has been used to determine the extent of the impact and requirements for more detailed modelling. More detailed modelling has been undertaken using the Kenilworth and Stoneleigh Wide Area Paramics model with standalone modelling of key site access junctions. This modelling has been undertaken for the 2026 model year (as a proxy for opening year) and this has formed the key scenario for determining development impacts and mitigation requirements. It is demonstrated that impacts across most of the network are modest but there are some residual impacts which require further consideration/mitigation, as follows:
• A45 corridor between Sir Henry Parkes Road and Stivichall roundabout.
• Gibbet Hill Road/Stoneleigh Road corridor between Kirby Corner Road and B4115.

The applicant's Transport Assessment informs that the proposal is likely to produce a maximum of 669 two-way vehicle flows across any peak hour. It should be noted that this occurs at 13:00, outside of the network peak hour on the local highway network. In terms of the amount of vehicle trips produced during the highway network peak periods (08:00- 09:00; 17:00-18:00), the development is anticipated to produce a total of 373 two-way vehicle trips in the AM peak and 342 in the PM peak.

As part of the Transport Assessment, a PARMICS model has been undertaken to assess the level of delay that the development proposals might have on vehicles on the local highway network, the assessment demonstrates that:

- Proposed development traffic is forecast to disperse well across the highway network with more traffic utilising the strategic network.
- The shift patterns mean that the development peaks occur outside of the peaks on the highway network.
- During the modelled periods, the impacts across much of the network are modest, not resulting in significant changes in delay.

The following are proposed mitigation measures:

- Construction Management Plan
- Wheel washing
- Site access junction to include provision for pedestrian and cyclists
- High quality pedestrian and cycle connections to proposed development and within site
- Contributions towards improvements to local bus / shuttle services
- Car parking management plan
- Control of shift patterns
- Travel Plan and Travel Demand Strategy

It is proposed to provide high quality active travel (walking and cycling) routes along the site boundary and commit to contributions towards off-site facilities linking to the local authority priority active travel corridors.

To ensure that traffic levels through Baginton Village remain within acceptable thresholds and enhance sustainable travel links, a Traffic in Villages scheme will be identified. **There is no HGV traffic to go through Baginton Village.**

Based on the above information from the applicant which has been analysed by National Highways, WCC Highways and Coventry City Council Highways, they all have no objection to the proposal, subject to a number of conditions and planning obligations. National Highways conclude that the development proposals will not have a material impact which would undermine the safe and efficient operation of the strategic road network.

National Highways:

National Highways conclude that there is a need for a cycle infrastructure upgrade at the A45/A46/A444 Stivichall Junction. They seek a contribution from the applicant to aid the delivery of these improvements to ensure the site can be accessed in a sustainable manner and meet the aims, targets and objectives of the proposed travel plan and infrastructure delivery strategy. The contribution request for this is £320,000.

They will also request a contribution to the enhancement of the cycle infrastructure on the A45 Corridor to the south of the A45/A46 Toll Bar End Junction. This will provide connectivity for communities along this corridor with the employment site and cycle facilities at the A45/A46 Toll Bar End Junction. The contribution request for this is £400,000.

National Highways recommend a number of conditions, which have been added, and a further S106 obligation for funding to implement mitigation which may be required because of a monitor and manage programme.

WCC Highways:

An initial review of the modelling outputs was provided by Warwickshire County Council in June 2021 (pre-application) with comments for the modelling presented in the Transport Assessment. Warwickshire County Council identified impacts of traffic redistribution as a result of the added traffic to the A45 and A46 from the development.
Within this review note, Warwickshire County Council requested the applicant to submit a further sensitivity test including the A46 Strategic Link Road (included in Warwick District's IDP, section T13b for Transport & Utilities, published in January 2019) to review if the impacts attributed to the development could be mitigated, which was provided.

The information shows that the development places additional strain on the routes to and from the development site along the A45 and A46. This in turn causes some local reassignment whereby traffic which was previously using the A46 and A45 to complete a journey within the original model is now electing to

assign along the local roads. This draws more traffic through the local area as a result.

However, the Strategic Link Road brings benefits to the network operation and the modelling information shows that the impacts are adequately mitigated.

From the analysis carried out, Warwickshire County Council can conclude that the A46 SLR is a key piece of infrastructure which would mitigate the potential impacts of the gigafactory on Warwickshire's network. Therefore, a contribution of £1,500,000 has been requested towards this scheme.

Contributions of £250,000 for active travel improvements to the south of the site and up to £1,250,000 towards the delivery of a traffic management scheme through Baginton village have also been requested by WCC Highways.

Coventry City Council Highways Officers have requested financial contributions of a proportion of £1,300,000 for improvement works to A45 and Gibbet Hill / Stoneleigh Road Corridor; £150 per employee mobility credits; £480,000 for improvements to W&C Howes Lane / to Finham; proportion of £1,850,000 towards London Road Active Travel Corridor; contribution TBC for improvements to St James' Lane to Willenhall / Binley; £49,050 x number of stations to be agreed for cycle hire scheme; £1,200,000 towards bus service enhancements; £TBC bus priority improvements at A444 / London Road; and, £68,000 towards travel plan monitoring. These are considered necessary to mitigate the impacts of the development on the wider highways network.

WCC Highways and Coventry City Council Highways Engineers have no objection to the proposal in this regard.

Other:

A member of the public raised concerns regarding a 200 acre gravel extraction site immediately to the south east of the airport shown under the Warwickshire County Council's new mineral sites assessment. They suggested that this will increase the amount of heavy goods traffic in the area considerably, but that it appears nowhere in this applicant's traffic assessments or those of the governmental authorities.

Officers consulted with the Minerals Authority on this matter, who stated that they have a site proposed for allocation in the Minerals Plan which is identified as Site No 6 (Coney Grey Farm). The site is actually 47 ha which is approximately 116 acres. There is only 0.3 -0.4 million tonnes of sand and gravel in the site as it has previously been worked, and much of the site around the river will not be worked as part of this proposal. The site is being included in the plan as it will complete the previous restoration scheme to a better standard, in terms of landscape and biodiversity. So this is a very small operation with a low level of mineral reserves and low production levels which are likely to be only around 100k tonnes per annum. The Mineral Authority have done a rough assessment of lorry movements based on that figure which is likely to be up to 36 loads a day if there is extraction and restoration taking place at the same time. This works out at less than 5 lorry movements an hour over an average day so the impact on the highway network would be minimal.

The applicant was asked for additional information on this point and confirmed that the modelling undertaken has included pertinent committed developments in line with transport modelling guidance. Whilst the modelling has not specifically included the assessment of the Coney Grey Farm quarry site, the level of trip generation forecast is expected to be very modest, equating to on average approximately one HGV movement every 12 minutes. It is assumed that the quarry would take access onto the A423 which has convenient access to the strategic road network and therefore the forecast increase in movements associated with the quarry would be imperceptible in the context of background HGV flows. The applicant also highlights that it is however worth noting that there is an allowance in the modelling for general growth in background traffic and this would more than adequately cover any additional movements anticipated from the Coney Grey Farm site.

WCC Highways have confirmed that the comments from the applicant are accurate, thus no further information is required in this regard, and Officers see no reason to conclude otherwise.

Royal Mail have objected to the proposed development. They occupy and are the leaseholder of Coventry South Delivery Office, immediately adjacent to the north of the proposed development site. Royal Mail currently also occupy and are the leaseholder of Parcelforce National Hub, immediately adjacent to the south of the proposed development site.

Royal Mail state that they already experience major congestion when entering and exiting the unit onto the Toll Bar island A45, A46 and London Road. During the Christmas period due to the high levels of shoppers and cars visiting the new shopping park, this becomes a major operational issue daily. The congestion at peak operating hours hinders timed deliveries, collections and distribution operations plus daily deliveries due to staff having to wait in the traffic around the site. There have also been major housing developments approved and implemented in the last 5 years.

All these factors together have an impact on the road network and Royal Mail consider that a proposal of this size is very likely to have a severe detrimental impact on the highway network. Royal Mail are concerned that the proposed active travel and improved public transport will not sufficiently mitigate this impact.

Royal Mail also point out that no Construction Management or Construction Logistics Plan is submitted. They consider that a Plan must be prepared in consultation with Royal Mail and other existing operators to manage construction impacts on the local road network.

WCC Highways have commented on this matter, stating that they are aware that the applicant has responded to those objections, confirming that the points raised relating to peak traffic movements have been considered in the modelling assessments and the traffic generated by Royal Mail is included within the baseline assessment. The County Council further considers that the parts of the Highway Network of most concern to Royal Mail fall outside of our administrative boundaries and will therefore be assessed by the adjoining Highway Authorities

as part of their consideration of the proposal. Again, it is noted that Coventry City Council Highways Engineers have not objected to the development.

A member of the public stated that the assessment on pathing does not consider the transportation of raw materials, nor did it consider the expansion of Middlemarch, Gateway South or completion of Binley Woods interchange.

The applicant has responded to this stating that, as part of the assessment of the gigafactory, all traffic movements, including HGV movements, have been fully accounted for. This has been carried out in line with guidance and has considered the cumulative effects of the gigafactory and other pertinent developments, including Gateway South and Whitley South.

The applicant states that they do not yet know exactly where raw materials will arrive from and finished products will be shipped to. However, the site is centrally located within the UK to access free flowing motorways providing access to Ports and Rail Freight Terminals for incoming raw materials and within 1 hour of car manufacturing facilities producing 60% of the UK's output, most of which are located around the West Midlands. Due to the central location, the gigafactory would create fewer HGV miles on the road network than battery manufacturing facilities located elsewhere.

Modelling work however has estimated the number of HGV movements and impacts on the highway network. Given that neither National Highways, WCC Highways or Coventry City Council Highways have raised issues regarding this, there are no grounds for requesting additional information in this regard.

Existing Highway Safety Issues

Across the study area, there has been a total of 127 accidents recorded within the most recent four-year period of data available. Whilst all accidents are regrettable, there is no clustering of accidents that would indicate a safety issue with the highway layout. It is therefore considered that no existing highway safety concerns are required to be addressed as part of the proposed development.

The relevant Highways consultees raise no concerns in this regard.

Access

The applicant advises that the primary site access junctions have been modelled and are forecast to operate well within capacity. The modelling has also demonstrated that impacts from the scheme across most of the network will be modest, with residual impacts which require further consideration or mitigation at two locations. Options for mitigation have been identified; these, and measures to avoid traffic impacts in Baginton, can be supported through financial contributions.

Access to the development is proposed to be taken from a number of points along the Rowley Road and the new access road between Rowley Road and Bubbenhall Road. These access points will accommodate pedestrians, cyclists, buses, cars and operational vehicles, as appropriate. A total of six access

junctions are proposed; two primary signal-controlled access junctions and four secondary priority controlled (give-way) junctions. The following principles are proposed:

Primary access points (signal-controlled):
- Accommodate access for the majority of staff cars, operational vehicles and potentially any public transport/private shuttle services, as appropriate.

Secondary Access Points (priority-controlled/give-way):
- Provide access to a limited amount of car parking and smaller service yards HGV Access Points
- HGV access will be provided at the two primary access points. HGV's will be provided with two lanes upon entry to the security perimeter, to provide stacking space should there be a delay with the security checks.

Pedestrian Access:
- Pedestrians will be accommodated via dedicated footways and crossing facilities integral to the junction. Pedestrian facilities will be separated from cycle movements once within the development boundary.

Cycle Access
- Cyclists will be provided with a segregated two-way cycle track which connects with the existing shared provision adjacent to the development site. Cyclists will be accommodated within the junction design and provided with protection under their own signal in a straight across movement where possible. Cyclists will be brought into the site away from the primary HGV access point (adjacent to Tollbar End) to reduce the opportunity for conflict.

Vehicle Access:
- Staff vehicles and Visitor Access will be provided to smaller car parks as appropriate.

Employees will have a shift pattern that is staggered and may require numerous control gates for personnel along the security fencing line. The applicant advises that the primary site access junctions have also been modelled and demonstrated to operate well within acceptable capacity thresholds.

A comprehensive access and infrastructure strategy will be required for the development of the site. A Travel Plan/Travel Demand Management Strategy accompanies the TA and sets out various travel-related measures and strategies that will be implemented to encourage staff to use alternative modes of transport to single occupancy car journeys.

The provision of Mobility Hubs will provide an integrated environment to and between sustainable travel modes. They are likely to have active frontages at the ground floor level and will provide facilities for interchanging modes and access to bicycles; bus; taxi; car share; EV charging; parcel delivery.

National Highways conclude that access arrangements are suitable and will operate in a manner which will not undermine the safe and efficient operation of the strategic road network.

WCC Highways and Coventry City Council Highways Engineers raise no concerns regarding the access arrangements. WCC Highways recommend conditions associated with the accesses to the site, including a condition for an Access Restriction Strategy which will ensure that HGV traffic does not access the site through Baginton Village. A Construction Management Plan will also be controlled through condition.

Coventry City Council Highways have requested that conditions are imposed regarding the accesses. However, WCC Highways have confirmed that their own proposed conditions cover the accesses within the Warwick District Council boundaries, and therefore adding the conditions suggested by Coventry City Council Highways would result in repetition. It is also noted that Coventry City Council Highways requested conditions without the benefit of the sight of the consultation response from WCC Highways. For these reasons, Officers conclude that the conditions proposed by WCC Highways are sufficient.

Parking

Local Plan policy TR3 states that development will only be permitted that makes provision for parking which:-
a) has regard to the location and accessibility of the site by means other than the private car;
b) does not result in on-street car parking detrimental to highway safety;
c) takes account of the parking needs of disabled car users, motorcyclists and cyclists; and
d) takes account of the requirements of commercial vehicles.

Development will be expected to comply with the parking standards set out in the most recent Parking Supplementary Planning Document.

The starting point for the required number of car parking provision for the site would be Council's adopted Vehicle Parking Standards, which states that 1 space per 50sqm will be required, along with 1 cycle space per 500sqm. For approximately 573,000sqm GEA (assumption based on maximum of GIA of 529,648 sqm of floorspace), this equates to 11,460 parking spaces and 1,446 cycle spaces.

The applicant states that the Council's Parking Standards do not have parking ratios that suitably fit this bespoke type of land use. Therefore, the need for car and cycle parking has been calculated based upon the number of employees on site at any one time, and their mode of choice. 1,900 parking spaces could be accommodated on site, as shown on the indicative layout plan. Clearly, this is well below the requirement set out within the Vehicle Parking Standards for this scale of development. 350 cycle parking spaces are provided on site. The applicant advises that this would address the needs of the people on site at any one time and provide a surplus to address the peak demand for staff shift changeover. It is also noted that additional parking could also be provided on site.

It is acknowledged that this is a unique development, and owing to the technologies involved with the nature of battery manufacturing, the level of parking set out within the standards may not be required, if this can be

adequately demonstrated. The Vehicle Parking Standards state that it is recognised that a degree of flexibility may be required due to the specific circumstances of a development proposal. Where it can be demonstrated that parking demand is likely to be lower than the prescribed standard, or indeed in excess of the prescribed standard, a flexible approach will be taken. Deviation from the standards may be deemed appropriate where the applicant can demonstrate specific circumstances in respect of one or more of the following:

1. The presence of capacity for additional demand to be accommodated on street without detrimentally affecting the safety and convenience of residents and occupiers

2. The presence of sufficient capacity in local off street car parks to accommodate any increase in parking demand

3. The development is located in an area that is demonstrably accessible by alternative modes of transport (e.g. the town centres of Leamington, Warwick and Kenilworth as defined in the Local Plan)

4. The development will not generate any (or negligible) parking

5. The development will generate significantly less parking than prescribed in the standard (e.g. meeting a specific local need)

6. The development meets other planning objectives

The applicant states that car parking demand calculations indicate that it is appropriate to provide 1,900 car parking spaces on site. This would address the needs of the people on site at any one time and provide a surplus to address the peak demand for staff shift changeover. The car parking will be ready for electric vehicle charging in every space, and a minimum of 25% will have plug in facilities ready at opening. To help create a culture of car sharing, 25% of spaces will be dedicated to 2+ bays and can only be parked in by those travelling with (an)other person(s). These spaces would be located nearer to the building entrance than standard vehicle parking spaces. This would be monitored using a Parking Management Strategy which will be detailed for submission as part of a reserved matters application.

Travel demand has been calculated from first principles to forecast the operation of the gigafactory. An aspirational mode split in favour of sustainable modes has been adopted with a maximum of 65% of employees projected to travel as a car driver and 35% travelling by sustainable modes (compared to 81% and 19% at the existing Middlemarch Business Park). A gravity model, based on the population and distance travelled has been prepared to understand the direction that staff will be travelling from, and the routes they will take. A comprehensive active travel strategy has been developed in consultation with the local authorities which focuses on the principles of connections on-site, connections along the site boundary which would be delivered as part of the development and potential improvements to the external network which would be funded in part by the gigafactory and other local developments. A public transport strategy has also been developed in consultation with the local authorities. This will achieve excellent quality connections to enable staff to access conveniently by bus from surrounding areas with journeys provided at shift changeovers.

WCC Highways note the suggestions from the applicant regarding parking, but comment that an agreement must be sought to provide more car parking, should it be required, and to permanently monitor in/out trips from the site, to ensure that adequate parking is provided to meet the needs of the development. They confirm that this can be controlled through condition for a parking strategy.

Finally, as the proposal relies heavily on modal shift towards public transport and Cycling, WCC considers that cycle parking at the higher end of the requirement (1000 spaces) should be catered for if not provided from the outset. The recommended condition for a cycle parking scheme from WCC Highways has been added to address this matter.

Other

It has also been identified that bus service improvements will be required in order to ensure sustainable transport options to the site are available and meet with the demands. A contribution of £790,000 has been requested towards this.

Ecology

Local Plan policy NE2 states that the Council will protect designated areas and species of national and local importance for biodiversity and geodiversity. Neighbourhood Plan policy G2 states that development proposals should address, with mitigation where appropriate, their impact on protected and vulnerable species and related habitats.

Members of the public raised the following concerns regarding ecological matters:

- loss of wildlife;
- protected species have been viewed on the site;
- grassland areas make a fantastic nature reserve;
- if pollutants escape, this would be extremely damaging to local wildlife;
- loss of trees and habitats.

Supporters of the proposal suggest that the development would have a positive impact on the environment.

The site includes semi-improved grassland, dense and scattered scrub, a wooded belt, hedgerow, ditches, along with areas of hardstanding, buildings and tall ruderal.

Habitats

The County Ecologist raised some concerns regarding the detail of the information provided, and noted that some areas of grass land included more varied species than contained within the supporting information.

The Bird Sanctuary and the River Avon are designated as Local Wildlife Sites (LWSs), with the latter also being a Habitat of Principal Importance under the NERC Act. These are within 0.1km and 0.2km of the site. Potential Local Wildlife Site (pLWS), Rowley Lane pLWS, is present within the sites boundary. An

Ecosite, Tollbar End, is present towards the north of the site. It appears the ecological value of the site has degraded and a waterbody is no longer present, although scrub is.

Natural England have no objection to the proposal and have confirmed that the development will not have a significant adverse impact on statutorily protected nature conservation sites or landscapes.

Protected and Notable Species

Initially, the Ecologist concluded that insufficient consideration had been provided within the ES to understand the cumulative impact from adjacent schemes. A number of protected species are present within the areas located immediately adjacent to the site and thus should have formed part of the assessment. However, the Ecologist confirms that this matter can be dealt with via the provision of a Protected Species Contingency Plan (PSCP) and a Construction and Environmental Management Plan (CEMP). These should take each species / habitat into consideration prior, during and post development and can be secured by condition. Further information is also required regarding the potential for bats within existing trees and buildings on the site. However, this can be secured through the provision of the aforementioned conditions.

The Ecologist notes the impact which lighting can have on protected species, and suggests that a condition for the provision of a lighting scheme is appropriate. A Landscape and Ecological Mitigation Plan is also required by condition.

Concern was raised by the ecologist that insufficient survey work had been undertaken regarding nesting birds, with particular reference to skylarks. The Ecologist concludes that, from the layout plans and considering the sensitivity of skylarks requiring large open spaces to breed, there is no scope on site to provide a suitable area to maintain the species. Therefore, a one-off agreed contribution could be made by the developer to support a scheme to mitigate for skylarks or a suitable off-site scheme should be provided.

Taking a precautionary approach, it has been agreed that off-site measures will include sufficient provision for 22 Skylark pairs / territories. It is agreed between WCC Ecology and the applicant that, in part, the biodiversity enhancements delivered through the biodiversity offsetting can also deliver enhancements for Skylarks. However, it is also recognised that the habitat requirements of Skylarks will not be consistent with some grassland management / enhancement initiatives which would otherwise be undertaken for biodiversity offsetting purposes. A separate Skylark habitat compensation calculation was therefore undertaken by WCC, and they have confirmed that the contribution request for this would be up to £600,000, unless otherwise agree by WCC Ecology. This will be secured through the S106 agreement.

Clarification was provided by the applicant that owing to the airport's strict aviation policy, this specifically reduces the opportunities for birds. They therefore consider that there would be no significant opportunities for wintering bird species, which WCC Ecology accept.

Biodiversity Impact

WCC Ecology agree that there will be an unavoidable and significant biodiversity loss as a result of this development. It has been agreed that the required off-site contribution to ensure that the development provides a biodiversity net gain equates to 120 Biodiversity Credits.

WCC has confirmed that capacity will be available within its off-setting schemes to deliver the required 120 credits. It was however agreed that for the S106 Agreement, it is appropriate to retain an element of flexibility regarding the delivery of the off-site enhancements. Such flexibility would give security to both the applicants and the Local Planning Authority with regard to the certainty that the mitigation solution is fully deliverable.

If the scheme is proposed to take on a phased approach the actual impacts will need to be monitored at each phase. Therefore, WCC Ecology recommend flexible wording is used within the S106 for a phased approach. A separate BIA will need to be carried out at each phase of the development to monitor the loss on site. The biodiversity offsetting contribution is capped at £2.4 million, unless otherwise agree by WCC Ecology.

The Warwickshire Wildlife Trust raised a number of concerns regarding the proposal, namely:
- biodiversity offsetting and mitigation should only be used as a last resort;
- detailed conditions should be provided to ensure that suitable habitat for skylarks are actually delivered, suitably maintained and monitored over the long term;
- BIAs should be carried out as early as possible to ensure that impacts can be suitably mitigated.

Given the above rationale for the proposal, and fact that the size of the gigafactory has been robustly demonstrated, there are not opportunities on site to provide further biodiversity enhancements, and offsetting is therefore required. Skylarks will be adequately protected through the S106 agreement and a BIA has been carried out to determine the level of offsetting required.

All of the recommended conditions from WCC Ecology have been added. As the proposal adequately mitigates the impact on protected species and habitats, it is therefore concluded that the proposal is in accordance with Neighbourhood Plan policy G2 and Local Plan policies NE2 and NE3.

Land Contamination

Members of the public raise concerns regarding the following:
- any attempt to put out fires requires a lot of water, the runoff is unmanageable resulting in these toxic chemicals entering the ground and contaminating the site, which is not covered within the supporting information;
- pollutants pose environmental risk to surrounding area;
- the application does not take into account risk and airborne contamination in the event of fire.

There is potential for soil and groundwater contamination at the site as a result of its current and historical use.

The Environment Agency note that in relation to the protection of controlled waters, a phase 1 geo-environmental desk study was provided with the application. They confirm that due to the site's sensitive setting and pollution history (as an airport, sewage works and landfill area), this now needs to be followed up by a Phase 2 intrusive study in order to identify and risk assess the actual impacts on and from this site to the local soils and water environment. Therefore, they consider that planning permission should only be granted for the proposed development as submitted if planning conditions are imposed which require the provision of a further study, and restriction of piling, foundations and surface water infiltration.

The Environmental Health Officer also notes the risk for land contamination. A preliminary risk assessment of the site was undertaken and provided by the applicant which concludes that further site investigation and risk assessment is required to adequately characterise the risk from contamination at the proposed development. As a result the Environmental Health Officer recommends a condition is imposed to ensure that the risks from land contamination are adequately characterised and if necessary remediated, prior to commencement of the development. This has been added. Officers confirmed with the Environment Agency that the condition proposed by the Environmental Health Officer was acceptable in terms of requiring the information they seek, and therefore only the condition from the Environmental Health Officer has been included.

Given that both the Environment Agency and Environmental Health Officer have no objection to the development on the grounds of contamination, Officers consider that sufficient information has been provided to demonstrate that the proposals are acceptable in relation to land contamination.

Drainage and Flood Risk

Local Plan policies FW1 and FW3 and Neighbourhood Plan policy G3 are relevant regarding the proposal and its impacts on drainage and flood risk.

Members of the public have objected on the following grounds:
- increased risk of surface water flooding;
- the FRA was carried out based on the existing site and does not account for the sheer size of construction in the proposed development;
- without a robust surface water management system to be concluded at this early stage of planning, serious risk of increased load will be placed on the Avon adjacent to the airport's boundary, resulting in serious level changes downstream in Stratford upon Avon;
- the application does not appear to have given sufficient regard to flooding issues.

The applicant provides the following information:

The application is supported by a Flood Risk Assessment and Drainage Strategy, and the effects of the scheme in terms of the water environment are reported in

the ES. This concludes that, providing the identified mitigation measures are implemented, the scheme is anticipated to have no significant effect on water resource receptors. The proposed implementation of SuDS will have a beneficial impact on water quality and quantity for the local watercourse system. The assessment indicates that the scheme will provide significant betterment to the surrounding area in terms of fluvial flood risk. Discharge will be managed to the relevant greenfield rate through measures including the provision of open SuDS features.

The flood risk assessment for the site shows that the site is at either very low or low risk of flooding, with the majority of the site in flood zone 1. A foul and surface water drainage strategy has been prepared to demonstrate that a sustainable drainage solution can be provided for the proposed development.

The surface water drainage strategy proposes to discharge surface water run-off to the existing watercourse present on-site. Attenuation storage will be provided in the form of open SuDS features.

Foul flows from the proposed development are proposed to discharge via new connection(s) to the existing foul Severn Trent Water network.

There are residual flood risks associated with any extreme storm event. However, these have been mitigated for as far as reasonably practicable. Providing the mitigation measures identified in this assessment and supporting FRA & Drainage Strategy are adhered to, the proposed development is anticipated to have No Significant Effect on Water Resource receptors within the study area. The implementation of SuDS will have a net beneficial impact on water quality and quantity on the local watercourse system in the long term.

These details have been assessed by WCC LLFA and the Environment Agency. Both consultees have confirmed that they are satisfied with the information provided, subject to conditions which require the provision of a detailed surface water drainage scheme, detailed maintenance plan and limiting the use of infiltration of surface water into the ground. These conditions have been added to ensure that the development provides adequate drainage and does not increase the risk of flooding.

Officers have no reason to conclude, based on the information available and responses from the consultees, that the development would increase risk of flooding. The development is considered to be in accordance with the requirements of Local Plan policies FW1 and FW3 and Neighbourhood Plan policy G3.

Energy Efficiency of the Development / Climate Change

Bubbenhall Parish Council express concerns that the total carbon emissions during construction and after the site is operational, plus the high carbon cost of steel and concrete used in construction of the plant make a mockery of Warwick District Council's 'Climate Emergency' and national and international agendas for dealing with climate change. They state that no concerted effort has been made to explore more sustainable forms of transport for raw materials and distribution of the end product other than by road. The cumulative emissions from HGV

movements on a 24/7 operation, from employee vehicles and from the plant itself would contravene WDC's expressed determination to work toward a greener future for the region. The CPRE consider that the impacts on climate change are not fully assessed in a proper way.

Members of the public express the following concerns regarding climate change and the energy efficiency of the development:

- the production methods are not 'green';
- the distance from raw materials is significant and there is a lack of carbon-neutral transport infrastructure to support the development;
- mining the raw materials required for the electric batteries has a detrimental impact on C02 emissions;
- the site does not currently have a suitable connection to the national grid, and a site for this is shown on the plan, so a considerable yet unquantifiable amount of Co2 will be created just to provide the site with a suitable (promised below ground) grid connection, to deal with the demand of staff EV charging let alone unknown operating loads;
- heating, construction and running of the manufacturing processes in the building will create a significant amount of C02 emissions;
- solar supply and replacements required over the lifetime of the development will produce C02 emissions.

Supporters of the proposal state that the development supports government's carbon reduction targets and will reduce the carbon footprint.

The applicant states that the sustainability of the building services design is a key aspect of the development, cognisant of the facility's purpose and its vital contribution to the UK's climate emergency response. Minimizing energy demand and associated carbon emissions through implementing passive design principles and managing the peak energy demand are key aspects of the detailed design that will be considered fully in conjunction with an occupier/operator.

The applicant informs that the UK's primary energy demand is derived from multiple sources with approximately 50% provided by offshore wind farms, PV and other embedded network generation. The applicant therefore considers that this approach to delivering energy to site at scale should at the very least replicate the approach of the utility network. It is envisaged that at least 50% of the regulated and process energy will be provided by embedded generation sources such as photovoltaic panels and wind turbines which will be optimized through the use of network storage arrays including on site battery technology to assist in peak load management.

The ES notes that from a climate change perspective, the absolute emissions associated with the scheme, with embedded mitigation, are modelled to be below the baseline emissions, which represents a positive impact. In terms of climate resilience, the effect of future climate change on the scheme is considered to be not significant. The emission saving achieved over the 80-year project lifetime was reduced when taking into account the decarbonisation of the national grid which negates any additional savings over a longer timeframe. The applicant is considering measures that exceed the minimum standards required by Building Regulations as well as meeting the Future Buildings Standard.

The Council's Climate Change Director has the following comments on the proposal:

There are three elements to the climate change considerations for this proposal.

The impact of the new building and operations on carbon emissions*: The policy context relating to climate change is described. In addition, details of the methodology for climate change impact assessment are provided. This looks at:*

- *emissions associated with combustion of fossil fuels in heating and generating electricity during the building operations*
- *a high level assessment of emissions arising from construction.*

Whilst the methodology does not consider carbon embodied in building materials, the approach appears to be reasonable and complies with the current policy requirements. This methodology appears to be robust and this will need to be applied at the detailed application stage to demonstrate the building performance in relation to carbon emissions.

The sustainability impact assessment addresses energy at section 1 and climate change at section 6. The assessment appears to be reasonable. However it should be noted that without suitable mitigation at the detailed design stage, the proposals are predicted to have a significant impact on carbon emissions and climate change. It will therefore be vital that (as set out at paragraph 5.33 of the Planning Statement) energy demand, renewable energy supply and climate impacts are considered fully at the design stage and operation stage to ensure the significantly reduced levels of impacts are achieved. Demonstration of this through applying the methodology for climate change impacts assessment will be important.

It is noted that there is a commitment to deploy EV charging infrastructure for 25% of spaces. This appears to be policy compliant although details will need to be assessed at the detailed application stage.

The impact of the new building and operations on climate change and the need to adapt locally to changing weather patterns: *A qualitative assessment has been undertaken of the vulnerability and sensitivity of the site to climate change. As a result a number of proposals are included in the sustainability statement setting out how climate resilience will be maximised including measures for managing over-heating, flooding, drainage, landscaping and travel. Further detail of this will need to be provided at the detailed application stage. This will also need to comply with policy CC1 in terms of site layout and design.*

The nature of the proposed use and the potential for this to impact nationally on the achievement of government goals relating to carbon reduction*: EVs are an important part of the national transport decarbonisation plan. Nationally and locally the policy is to entirely phase out vehicles that are reliant of fossil fuels and to replace these with electric, hydrogen or other low emissions vehicles. At present, EVs provide the most readily available alternative to fossil fuel based vehicles. As set out within the Planning Statement (rationale for development) battery manufacturing capacity is needed in the UK. To enable*

manufacturers to scale up production of EVs and to source batteries locally (i.e. within the UK), manufacturing capacity needs to be developed within the UK.

Locally, around 45% of carbon emissions are from on road transport. EVs will play an important role in reducing these emissions, particularly in rural areas. It has been identified that the number of EVs across Warwickshire is expected to grow from below 10,000 vehicles in 2020 to over 150,000 by 2030. WDC is committed to supporting this expansion through the provision of EV charging infrastructure. This is incorporated in the Council's Climate Change Action Programme. The development of a gigafactory, is therefore important in supporting national and local carbon reduction plans.

The Climate Change Director therefore has no objection to the application, but suggests that conditions are attached to the outline permission to ensure that measures to minimise carbon emissions and to comply with CC1 (as detailed in the planning statement and sustainability assessment) are incorporated as a minimum at detailed application stage. In ensuring that the development meets the requirements of Local Plan policies CC1 and CC3, a condition will be added to ensure that the development meets the BREEAM 'very good' standard. This will also address the Climate Change Director's recommendations.

What must be noted is that the development must not be assessed against the Council's Climate Change Emergency Declaration, it must be assessed against the relevant planning policies, which in this case are Local Plan policies CC1 and CC3, and the NPPF. The proposal adequately demonstrates that it would meet with the requirements of these policies. Impacts on air quality for example, can be controlled appropriately via conditions, which is discussed in more detail below. Whilst members of the public consider the distance from raw materials to be significant, it has been demonstrated above that this site is the only available site for the proposed development, and has the relevant infrastructure to support the proposal. It is considered that once realised, the development would have a significant impact in terms of meeting the aspirations of paragraph 152 of the NPPF for the planning system to: support the transition to a low carbon future in a changing climate; shape places in ways that contribute to radical reductions in greenhouse gas emissions; and support renewable and low carbon energy and associated infrastructure.

It should also be noted that prioritising the use of recycling also decreases the amount of new primary sources, or mining, as well as strengthening the security of the supply of materials. It also allows batteries reaching the end of their life in the UK to be recycled in the UK reducing the overall carbon footprint of battery manufacture and contributing toward the UK meeting its Climate Change obligations.

Air Quality

Members of the public suggest that the proposal would have a detrimental impact on air quality from factory and additional traffic. The CPRE state that the superficial analysis of road traffic means noise and air quality assessments cannot be relied on.

The Environmental Health Officer recommends that a condition is imposed requiring the applicant to produce a Low Emission Strategy in compliance with the SPD guidance and submit the proposal for approval prior to commencement of the development. The Low Emission Strategy guidance establishes the principle of Warwick District as an 'Emission Reduction Area' and requires developers to use 'reasonable endeavours' to minimise emissions and, where necessary, offset the impact of development on the environment. Under the guidance the above development is classified as a Major scheme because it meets DfT Threshold Criteria for a Transport Assessment and required an EIA, as such the developer is required to offer Type 1, 2 and 3 mitigation from the attached guidance to make the scheme acceptable. As explained in the guidance, electric vehicle (EV) recharging provision is required for 10% of the parking spaces provided in the development (this may be phased with 5% provision initially and a further 5% trigger). The guidance sets out a range of locally specific measures to be used to minimise and/or offset the emissions from new development, however these are suggestions and other innovative ideas are encouraged.

The Environmental Health Officer recommended that prior to determination of the application the damage costs for the proposed development should be agreed with Environmental Health, this sum of money should be provided as part of the applicant's s106 contribution for the scheme with the money used for air quality improvement measures detailed within the Council's Air Quality Action Plan. This has been calculated at £433,386.47 and agreed.

The impact on air quality has been assessed in the Environmental Statement. Environmental Health have accepted the findings of this assessment.

Given that the impacts on air quality can be mitigated and that the Environmental Health Officer has fully assessed the data provided, considering it to be sound, the proposal is considered to be in accordance with Local Plan policy NE5.

Open Space Provision

Local Plan policy HS4, Open Space provision, requires applicants to include a proportion of the site to meet its requirements for open space, sport, and recreation, except where it would be more appropriate to improve or enhance recreation facilities off-site, if this is within its catchment area.

Neighbourhood Plan Policy BAG6: Green Infrastructure states that "Proposals for new public open space should adopt the Green Infrastructure (GI) approach and be designed to provide open space, sport and recreation uses which:

- Are accessible to all; and
- Safeguard and enhance the natural and historic environment; and
- Protect priority species and enhance habitats and sites of special biodiversity interest.

Members of the public have stated that the open space provision at the site will give little feeling of openness or enjoyment.

In accordance with the Council's Public Open Space SPD (2019) if 6000 full time (or equivalent employees) are proposed, this would result in a requirement for a minimum of 15 ha of open space (Parks and Gardens 6 ha; Natural Areas including Urban Woodland 6 ha and Amenity Green Space 3 ha). This can be accommodated on site and will be secured through the S106 agreement.

The Parameters Plan identifies at least 35.3ha of land within the site which will be dedicated to landscaping, SuDS features and infrastructure. The Illustrative Masterplan included within the Design and Access Statement includes approximately 29.2ha of publicly accessible, multifunctional open space, which is more than the minimum requirements above.

The proposed open space provision within the site boundaries has been designed with an illustrative Green Infrastructure Strategy, and will be accessible to all. The applicant advises that green infrastructure features can be used to clean and control the discharge of water from the site, whilst enhancing and diversifying habitat for wetlands, and more generally. There is the potential for increased tree planting and for open space to perform a range of functions such as recreation, leisure and education, in addition to creating habitat and providing an attractive landscaped setting to the site and helping to screen views. The specific design and layout of the open space will be secured through the approval of reserved matters.

It should be noted that much of the proposed open space will link to the north and south to the neighbouring Community Park (part of the Whitley South and Gateway South developments). This will create a sense of cohesiveness between the neighbouring sites and will provide an extensive area of green, open space which members of the public can enjoy.

As set out within the above sections, whilst there would be biodiversity loss at the site, overall this can be adequately mitigated offsite, and protected species can be adequately protected through conditions attached to the application. The open space will not have a harmful impact on the natural or historic environment and will create additional opportunities for members of the public to access the site, which currently do not exist.

It is therefore considered that the development meets with the aforementioned policies and guidance.

Section 106 Obligations

The proposed development would create additional demand for local services and to mitigate this, contributions towards certain community facilities would be required.

Having considered the available evidence, the contributions are considered to be in accordance with Regulation 122 of the Community Infrastructure Levy Regulations 2010. The development of a gigafactory would have a material impact on or need for improvements to public open space, highways and associated infrastructure improvements, biodiversity offsetting, skylark mitigation, air quality mitigation, and an employment skills package.

The relevant consultees are currently seeking to identify specific projects and locations where this money would be spent. Therefore it is considered that appropriate contributions are necessary to make the development acceptable in planning terms and subject to being directly related to the development, are fairly and reasonably related in scale and kind to the development (as required by Regulation 122).

The necessary contributions identified will be secured through an appropriate Section 106 Legal Agreement. The following requests have been received;

- Onsite provision of Public Open Space
- WCC Highways contributions:
  - £1,500,000 towards A46 strategic road link;
  - £250,000 towards active travel improvements to the south of the site;
  - £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;
  - £1,517,000 towards mitigation measures which may be required because of the Monitor and Manage programme;
- Coventry City Council Highways contributions:
  - £1,300,000 for improvement works to A45 and Gibbet Hill / Stoneleigh Road Corridor;
  - £150 per employee mobility credits;
  - £480,000 for improvements to W&C Howes Lane / to Finham;
  - proportion of £1,850,000 towards London Road Active Travel Corridor;
  - contribution TBC for improvements to St James' Lane to Willenhall / Binley;
  - £49,050 x number of stations to be agreed for cycle hire scheme;
  - £1,200,000 towards bus service enhancements;
  - contribution TBC for bus priority improvements at A444 / London Road;
  - £68,000 towards travel plan monitoring.
- Biodiversity offsite mitigation, to equate to provision of 120 biodiversity credits, with a cap of £2.4 million, unless otherwise agreed by the Council;
- Skylark mitigation, with a cap of £600,000, unless otherwise agreed by the Council;
- Air quality mitigation damage costs of £433,386.47 (or equivalent scheme to the value of);
- Employment and Skills Plan to maximise jobs and training benefits for the area;
- WDC monitoring fee.

The County Council require a monitoring and administration fee in respect of the County Council obligations. The amount of this fee is based on the complexity of the agreement and the level of contributions payable and will be assessed at the point a S106 agreement is drafted. They envisage the monitoring fee being in the region of £10,000.

Members of the public consider that there is a lack of housing and infrastructure to support incoming families moving to the area for jobs. However, the development is proposed at this location *because of* the nearby job pool and infrastructure to support the site. Any gaps in infrastructure can adequately be mitigated with the aforementioned S106 contributions.

Given that the proposal relies on very special circumstances to permit development within the Green Belt, it will be necessary in planning terms to tightly secure the use of the site. Usually, the use of the site can be controlled by condition, however, in this instance given the complex nature of the development and evolving nature of electric battery production, it would not be possible to secure the use via a condition. The more appropriate mechanism would be to secure the use via the S106 agreement, which the applicant has confirmed they agree to.

The gigafactory will produce and recycle big battery power for big applications, dominated by automotive at the outset, but will likely also provide batteries for a growing share in other sectors, such as "Powerwall" type products, i.e. batteries which store energy often generated from solar or other renewable sources and use it to power homes and businesses, and act as a backup in the event of outages.

The S106 agreement therefore sets out the description of what is permitted in terms of the use of the site, and there is also a requirement for the Council to agree that any occupier that the applicant identifies, to ensure that they would be consistent with that description.

Cumulative Impacts

The ES submitted considers the cumulative impacts of the proposed and existing nearby committed development. This concludes that following the implementation of the mitigation measures outlined within each technical chapter, the majority of residual environmental effects have been assessed as being not significant. The applicant considers that the proposed development will result in residual significant beneficial effects in relation to the socio-economics and ground conditions, which have already been discussed in detail above.

Notably, the indirect and induced impacts of the operational development would be substantial, supporting 7,500 additional indirect jobs through the supply chain impacts of the operation, and a further 3,400 induced jobs driven by the expenditure of income on goods and services by workers employed as a result of the proposed development.

The applicant confirms that the transport assessment work takes into account the cumulative impact of traffic generation from both the proposed development and a multiple number of 'committed' developments. The assessment concluded that construction traffic is unlikely to exceed IEMA thresholds. It also found that there are no highway safety concerns that need to be addressed as part of the proposed development. Whilst the increase in traffic generated by the proposed development will lead to significant effects upon severance and fear and intimidation prior to mitigation, measures such as the provision of site accesses,

a fully integrated pedestrian and cycle movement strategy and implementation of a travel plan will reduce the effect to one that is not significant.

The applicant notes that development on land north of Rosswood Farm in Baginton will further reduce the potential for views from the west and will continue the urbanisation of Coventry Road in this area. Due to the differing scales and types of development, this development will make negligible changes to the levels of effect arising from the proposed development.

Officers agree with the applicant's conclusions above. It is considered that subject to appropriate mitigation, where identified, the cumulative impacts of the proposal and other committed development would be acceptable.

Other Matters

Speculative Nature of Proposal

Many comments relating to the application relate to the fact that there is no end user identified for the proposal. As detailed above, Iceni Projects confirm that it is not unusual for this nature of development not to have an identified end user at this stage. There is also no planning requirement that an end user is identified prior to submission, or determination of a planning application. Most importantly however, is that the above information clearly shows that there is a strong and immediate need for the development of a gigafactory in this location, therefore Officers have confidence that an end user would be found for this development within the short term future. The applicant has informed Officers that the site is "receiving international attention from global battery manufacturers and various discussions are ongoing which are commensurate with the size and scale of facility being proposed".

Water and Electrical Supply

Members of the public have questioned whether there is sufficient water and electrical supply to facilitate the development. The applicant has informed Officers that both Western Power and National Grid have confirmed that they can increase power supply via Berkswell in the required timescales to feed the gigafactory and the wider area. It is also notable that one of the selection criteria for this site is sufficient electrical supply. The applicant states that the gigafactory will be powered by 100% green, sustainable energy, which will come from sustainable sources from the National Grid as well as an onsite microgrid of photovoltaic panels on the gigafactory’s roof.

Moreover, National Grid have submitted a stance of no objection to the application. Western Power have been consulted, but no comments have been received. The lack of an objection gives Officers confidence that they do not have concerns regarding the proposal which can be delivered in this regard, particularly as National Grid have submitted a stance of no objection.

Regarding water supply, Local Plan policy FW4 states that developers will be expected to ensure that there is adequate water supply to serve existing and proposed developments. This policy requires that the need for new infrastructure is minimised by directing development to areas where there is a guaranteed and

adequate supply of water, having due regard to Severn Trent's Water Resources Management Plan and Strategic Business Plan as well as the findings of the Water Cycle Study.

Severn Trent's Water Resources Management Plan 2019 shows that without future investment, a supply / demand shortage would be apparent over the next 25 years within the 'Strategic Grid', where the site is located. However, the document proposes methods to manage these future challenges and prevent future supply / demand deficits. Given that the site forms part of the strategic network in terms of water supply, where Severn Trent are investing in ensuring that adequate water supplies can be provided, Officers consider the site to be acceptable in this regard.

In 2019, Severn Trent's Strategic Business Plan for 2020-2025 was awarded 'fast track' status by Ofwat, who regulate the water sector in England and Wales. Ofwat describe the business plan as one of the most ambitious and well-evidenced within the water sector, and was ready to implement. Therefore, this gives Officers confidence that the aspirations of Severn Trent to manage water supply and deficit within the strategic grid can be achieved.

Policy FW4 also requires that, in accordance with the Water Framework Directive's objectives, development must not affect the waterbodies' ability to reach good status or potential as set out in the River Severn Basin Management Plan. Responsibility for planning the future of the Severn river basin district is shared between the Environment Agency and Natural Resources Wales. The Environment Agency were consulted on the application and have not objected to the proposed development. Given that Severn Trent were also consulted, and have not objected to the proposal, Officers have no reason to conclude that the proposal would conflict with this requirement.

Crime Prevention

Warwickshire Police have been consulted on the application and have no objection to the proposal. They request that the principles of Secured By Design (SBD) Commercial 2015 be incorporated into the design. They note that the principles and standards of the SBD initiative give excellent guidance on crime prevention through the environmental design and also on the physical measures. The scheme has a proven track record in crime prevention and reduction in anti-social behaviour and should be an important factor in this strategic development. They recommend that this should be made a condition of the application, which has been added.

Fire Safety

WCC Fire and Rescue Service Water Department have commented on the application and have no objection, subject to the inclusion of a condition for the provision of adequate water supplies and fire hydrants. This has been added.

The WCC Fire and Rescue Service Fire Protection Department initially queried the access arrangements and manoeuvrability of emergency vehicles within the site boundaries. Further information was provided regarding this matter by the

applicant, which has satisfied the concerns raised. They have also recommended informative notes, which have been added.

Minerals

There are three separate safeguarded mineral resources on the site, namely sand and gravel, coal and sandstone, and as such a Minerals Resource Assessment (MRA) has been undertaken. The MRA concluded that the site meets the criteria set out in Warwickshire's adopted and emerging mineral policies for the proposed development to be acceptable in a Mineral Safeguarding Area.

The Mineral Safeguarding Areas for unconsolidated sand and gravel, building stone and coal underlying the site have been identified as a geological resource which may be affected by the scheme. The submitted Minerals Resource Assessment provides an appraisal of the minerals' value and the potential for their working. Based on the size of the unconsolidated sand and gravel deposits and the indirect sterilisation by existing industrial development, the applicant considers it unlikely that it would ever be worked, and it has no potential value.

WCC Minerals were consulted on this information and agree with the assessment that the quantity of safeguarded sandstone on the site is too small to be commercially viable and that deep coal would need to be worked using underground methods. However, safeguarded sand and gravel deposits could be addressed. WCC Minerals state that the MRA is limited in some regards, and does not clarify the extent to which these sand and gravels are economically viable, in terms of their quantum and type. Despite this, and considering the benefits of the scheme and possibility for prior extraction of materials, they conclude that the application can be conditioned for the provision of a Construction Management Plan, which includes details of subsurface minerals. This has been added as a standalone condition for clarity.

Refuse

Members of the public object on the grounds of increased risk of littering. However, this matter would be dealt with via the reserved matters process. Officers have no reason to believe that this cannot be adequately controlled at a later stage.

It should be noted that in terms of the waste from the site produced, the intention is that the facility would adopt a "cradle to cradle" approach, that takes the whole lifecycle of an item into account, including sourcing and end-of-life disposal, This is seen as vital to developing a sustainable manufacturing model.

Procedural Matters

A member of the public has criticised the application, stating that the applicant has failed to provide all the relevant detailed environmental information required for a proposed development of this type, they have also failed to enter into the required public consultations. The objector states that by the nature of this plant it would be processing both hot metals and toxic chemicals, by definition the application falls under the remit of the AARHUS Convention which promotes

Good Governance and Human Rights in the Environmental decision making process.

The principles of the Aarhus Convention are enshrined in the normal planning process, this is therefore not an additional requirement that would form an entirely separate consideration. The planning process includes provisions for making any relevant environmental information available to the public as well as provisions for assessing whether the environmental information that has been submitted is adequate.

It is the decision for the Local Planning Authority to consider whether the environmental information that is available is sufficient to enable the Council to make an informed judgement on the environmental impacts of the development. This includes considering whether it would be appropriate to condition the submission of further information on any matters.

Based on the information and assessment set out above, and when considering the relevant consultation responses, Officers conclude that they are satisfied that all of the necessary information is available in order to make this recommendation to Councillors, therefore Officers do not consider that there would be a contravention of the convention.

Baginton Parish Council and members of the public suggest that the ES is unreasonably vague and non-committal, showing insufficient consideration for the true environmental impact of such a development. Consequently, they consider that the application is wholly insufficient as it fails to truly depict the harm that may be caused to residents. Officers disagree with this assertion and as shown above, have been able to fully assess this outline application. Where necessary, additional information or clarification has been sought from the applicant, which has been provided.

Members of the public have criticised the consultation exercise carried out. However, a full and extensive consultation has been carried out by the Local Planning Authority, which meets with the relevant requirements of the Development Management Procedure Order 2015.

Members of the public have stated that the decision is "as good as made" and that members of the public have a lack of power in the decision making process. However, as shown above, a thorough assessment has been made of the application, including an impartial assessment of the applicant's very special circumstances case. All comments received in relation to the proposal have been taken into consideration as part of the assessment of the application, which will subsequently be determined by members of the Planning Committee, and the decision also has to be referred to the Secretary of State.

Members of the public state that the application does not appear to contain stakeholder reports from Warwickshire Fire and Rescue, Coventry Fire Service, NHS local trusts, Local and County Police, covering the required Emergency Response Plan. However, the Fire and Rescue Service and Police were consulted on the application, which is covered above. There is no requirement to consult the NHS for an application of this nature.

Members of the public state that the application does not appear to contain stakeholder input from HM Government as part of Emergency Response and Recovery. However, there is no requirement to consult the Government in relation to this matter.

Other

Officers have also received the following comments:

- The Government needs to set stricter legislation to control lithium extraction as such proposals tend to be scarce and take years to materialise. We must ensure both the long-term sustainability of lithium supply and minimise the impact on local communities and environment.
- The case for the sole of use of electric powered transport to reduce emissions is simplistic and far from sustainable. Simply replacing millions of vehicles with combustion engines on the road today with electric vehicles is anything but environmentally friendly and climate neutral.
- Battery technology is already outdated before production starts.
- Poor track record of Rigby Group with previous developments.
- Roxhill is owned by Peter Rigby and family and are promoting a large employment based development immediately north of Coombe Abbey Pools amounting to some 300 acres. Although this is on hold, the inevitable conflicts are obviously very considerable. Rigby etc al own the leasehold of the land of the proposed gigafactory.
- Impact on property values.

These matters are either statements or not material planning considerations, and/or are controlled through other legislation.

Conclusion

Planning Balance

In terms of harm, the development represents a departure from the Local Plan regarding the provision of employment use outside of the directed areas. However, this must be put into context; the specific nature of the proposal is of regional and arguably national importance, which does not directly compete with other employment allocations in the Local Plan. Moreover, the proposal aligns with the spatial strategy in the Local Plan, in that policy DS4 requires that the majority of growth is focused on the main urban areas of Warwick, Leamington, Whitnash and Kenilworth and on **the southern edge of Coventry**. Therefore, the level of harm associated with the departure from the plan is offered limited negative weight.

The proposal includes the loss of an airfield, which is considered to be part of the general aviation network. However, given its very limited existing connectivity and relatively limited opportunities to meaningfully increase connectivity at the site, its loss is significantly outweighed by the substantial benefits which are identified. The loss of the airfield is therefore offered some negative weight.

The development would have a detrimental impact on the wider landscape character, namely through the introduction of a large scale industrial building, on

an open site. However, as detailed above, owing to the wider site context, the actual level of harm is tempered, and the weight offered to the harm is considered to be moderate.

There would be less than substantial harm to the Baginton Conservation Area, identified as being on the lower end of the scale. In view of the limited level of harm, this is given some negative weight.

The development represents inappropriate development by definition within the Green Belt, and is harmful to openness in visual and spatial terms. In totality, the NPPF requires that this is afforded significant weight.

The benefits of the proposal include the provision of a minimum of 15 hectares of public open space, which will connect to the wider Community Park, approved as part of the Whitley South and Gateway South developments.

The proposal will also make a significant contribution in addressing climate change concerns, which is identified as a key priority within the NPPF.

The very special circumstances case proposed by the applicant details the urgent need for the development and the fact that the delivery of the development cannot wait for the Local Plan review process (the South Warwickshire Local Plan timetable expects adoption in December 2025) to consider release of the site from the Green Belt. It has been demonstrated that the application site is the only one which can deliver the development within the required timescales. There will also be significant economic benefits associated with the development on a local and regional scale, and with this, significant detrimental impacts on the region's car manufacturing industry if the development was not to go ahead.

Taken together, the benefits that have been identified are considered to be substantial. The economic benefits in particular are afforded significant weight. Furthermore, the very special circumstances case is considered to be compelling. It is considered not only to outweigh the harm to the Green Belt, but would also outweigh other matters of harm identified above. Whilst the totality of harm identified above would be substantial (principally due to the fact that the development is inappropriate by definition within the Green Belt), it is considered that the compelling and critical case put forward by the applicants clearly outweighs the identified harm.

For these reasons, it is recommended that Planning Committee grant planning permission, in accordance with the Officer recommendations.

CONDITIONS

1 Details of the following reserved matters for each phase of the development shall be submitted to and approved in writing by the local planning authority before any part of that phase of the development is commenced:-

- the layout of the phase and its relationship with existing adjoining development;

- the scale of the buildings;
- the appearance of the buildings; and
- the landscaping of the site.

The development shall be carried out in full accordance with these reserved matters as approved. **Reason:** To comply with Article 4(1) of the Town and Country Planning (Development Management Procedure) Order 2015 (as amended).

2 Application for approval of the reserved matters shall be made to the local planning authority not later than three years from the date of this permission. **Reason:** To comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

3 The development to which this permission relates shall begin within three years of the date of this permission or within two years of the final approval of the reserved matters, whichever is the later. **Reason:** To comply with Section 92 of the Town and Country Planning Act 1990 (as amended).

4 No development within any phase shall take place until a detailed surface water drainage scheme for that phase, based on sustainable drainage principles and an assessment of the hydrological and hydrogeological context of the development, has been submitted to and approved in writing by the Local Planning Authority in consultation with the LLFA. The scheme shall subsequently be implemented in accordance with the approved details before the relevant phase of development is completed. The scheme to be submitted shall:

- Demonstrate that the surface water drainage system(s) are designed in accordance with 'The SuDS Manual', CIRIA Report C753.
- Demonstrate detailed design (plans, network details and calculations) in support of any surface water drainage scheme, including details of any attenuation system, and outfall arrangements. Calculations should demonstrate the performance of the designed system for a range of return periods and storm durations inclusive of the 1 in 1 year, 1 in 2 year, 1 in 30 year, 1 in 100 year and 1 in 100 year plus climate change return periods.
- If discharging to a drainage system maintained/operated by other authorities (Environment Agency, internal drainage board, highway authority, sewerage undertaker, or Canals and River Trust), evidence of consultation and the acceptability of any discharge to their system should be presented for consideration.
- Provide plans and details showing the allowance for exceedance flow and overland flow routing, overland flow routing should look to reduce the impact of an exceedance event.

Reason: To prevent the increased risk of flooding; to improve and protect water quality and to improve habitat and amenity in accordance with Policies FW1, NE5, NE2 and BE3 of the Warwick District Local Plan 2011-2029.

5 1. No development of each phase shall commence unless and until:

(a) a site investigation shall be designed for that phase using the information obtained from the desk-top study and any diagrammatical representations (conceptual model). This must be submitted to and approved in writing by the planning authority prior to that investigation being carried out. The investigation must be comprehensive enough to enable:

- A risk assessment to be undertaken relating to human health
- A risk assessment to be undertaken relating to groundwater and surface waters associated on and off site that may be affected
- An appropriate gas risk assessment to be undertaken
- Refinement of the conceptual model
- The development of a method statement detailing the remediation requirements

(b) the site investigation has been undertaken in accordance with details approved by the planning authority and a risk assessment has been undertaken for that phase.

(c) a method statement detailing the remediation requirements, including measures to minimise the impact on ground and surface waters using the information obtained from the site investigation for that phase, has been submitted to the planning authority. The method statement shall include details of programming and of how the remediation works will be validated upon completion of that phase. This should be approved in writing by the planning authority prior to the remediation being carried out on the site.

2. Each phase of the development of the site shall accord with the approved method statement and programming for that phase.

3. If during development contamination not previously identified is found to be present at the site then no further development shall take place (unless otherwise agreed in writing with the planning authority through an addendum to the method statement). This addendum to the method statement must detail how this unsuspected contamination shall be dealt with and a programme for doing so.

4. Upon completion of the remediation detailed in the method statement for each phase, a report shall be submitted to the planning authority that provides verification that the required works regarding contamination have been carried out in accordance with the approved method statement for that phase. Post remediation sampling and monitoring results for that phase shall be included in the report to demonstrate that the required remediation has been fully met. Future monitoring proposals and reporting shall also be detailed in the report for that phase.

5. No occupation of each phase of development shall take place until a verification report demonstrating completion of the works set out in the approved remediation method statement and the effectiveness of the remediation has been submitted to and approved, in writing, by the local planning authority. The report shall include results of sampling and monitoring carried out in accordance with the approved verification plan to demonstrate that the site remediation criteria have been met. It shall also include any plan (a "long-term monitoring and maintenance plan") for longer-term monitoring of pollutant linkages, maintenance and arrangements for contingency action, as identified in the verification plan. The long-term monitoring and maintenance plan shall be implemented as approved.

Reason: To safeguard health, safety and the environment and to prevent the pollution of Controlled Waters, notably the underlying Principal and Secondary A groundwater aquifers and the nearby River Avon, in accordance with Policies BE3 and NE5 of the Warwick District Local Plan 2011-2029.

6 No development, other than works of demolition, shall be carried out unless and until a Materials Management Plan for the site to ensure that minerals which can be viably recovered during development operations are recovered, has been provided to and agreed in writing by the Local Planning Authority. The Plan shall set out measures to be taken to minimise the sterilisation of minerals resources of local and national importance, the type and anticipated quantity of mineral to be removed, the method of recovery, time scales, on-site and off-site storage facilities, movement of minerals both on site and/or off site and the measures and controls to be applied to deal with amenity considerations. The Materials Management Plan shall be adhered to throughout the duration of the construction period. **Reason:** To minimise the sterilisation of minerals resources, in accordance with the requirements of Policy NE5 of Warwick District Local Plan 2011 - 2029.

7 No above ground construction shall commence in each phase until a scheme for the provision of adequate water supplies and fire hydrants, necessary for firefighting purposes at the site for that phase, has been submitted to and approved in writing by the Local Planning Authority. That phase of the development shall not then be occupied until the scheme for that phase has been implemented to the satisfaction of the Local Planning Authority. **Reason:** In the interests of public safety from fire and the protection of emergency fire fighters.

8 No demolition or construction works shall commence in any phase (including any ground remodelling works), until an arboricultural method statement (AMS) and a tree protection plan (TPP), together referred to as the scheme of protection, for the protection of the trees to be retained within that phase have been submitted to and approved in writing by the Local Planning Authority.

The scheme of protection must be prepared in accordance with BS 5837:2012 Trees in relation to design, demolition and construction – Recommendations (referred to here as BS 5837) and shall refer to a retained tree's root protection area (RPA as defined in BS 5837) and to any work that may affect a retained tree above-ground.

Specific issues to be considered in the scheme of protection shall include how to control:

- the impact that demolition may have (if appropriate).
- the impact that the installation of services/utilities/drainage may have (if appropriate).
- the impact that construction may have
- the impact that changes in level may have.

The scheme of protection should make recommendations for:

- tree pruning to allow the development to proceed (if appropriate)
- tree protection, to be shown on the TPP with offsets from fixed points to confirm the alignment of any protective fencing and the extent of any ground protection
- ground protection where scaffolding will be erected (if appropriate)
- ground protection where cranes will be installed (if appropriate).
- the specification and installation of any boundary treatments within or adjacent RPA's or that may impact any of the retained trees
- the specification for the construction of any access, driveway, parking area or the like that encroach over the RPA's of the retained trees
- site setup, including (but not limited to) site access, parking, on-site welfare facilities, temporary buildings, loading, unloading and storage of equipment, materials, fuels and waste as well concrete mixing, including suitable control measures to protect the retained trees from harm from those facilities or activities
- a site monitoring protocol that will confirm by independent examination by a suitably qualified tree specialist that the agreed scheme of protection is in place

The development thereafter for that phase shall be implemented in strict accordance with the approved scheme of protection, which shall be kept in place until all parts of the development of that phase have been completed and all equipment, machinery and surplus materials have been removed.

Reason: In order to protect and preserve existing trees within the site which are of amenity value in accordance with Policies BE1 and NE1 of the Warwick District Local Plan 2011-2029.

9 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. 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.

10 Notwithstanding the submitted details, no phase of development shall commence on any reserved matters consent until a Final Tree Retention and Removal Plan identifying existing trees, shrubs and hedgerows to be retained within the area to which that application relates has been submitted to and approved in writing by the local planning authority. The existing trees, shrubs and hedgerows shown to be retained on this plan shall not be cut down, grubbed out, topped, lopped or uprooted without the written consent of the local planning authority. Any trees, shrubs or hedgerows removed without such consent or dying, or being severely damaged or diseased or becoming, in the opinion of the local planning authority, seriously damaged or defective, within five years from the substantial completion of development shall be replaced, as soon as practicable with trees, shrubs or hedgerows of such size and species details of which must be submitted to and approved by the local planning authority. All trees, shrubs and hedgerows shall be planted in accordance with British Standard BS4043 – Transplanting Root-balled Trees and BS4428 – Code of Practice for General Landscape Operations (excluding hard surfaces). **Reason:** To protect those landscape features which are of significant amenity value and which ensure a satisfactory standard of appearance for the development in the interests of the visual amenities of the area in accordance with Policies DP1 and DP3 of the Warwick District Local Plan 1996-2011.

11 Each phase of the development hereby permitted shall not commence until a Construction and Environmental Management Plan has been submitted to and approved in writing by the District Planning Authority for that phase. The CEMP needs to be compliant with the British Standard on Biodiversity BS 42020:2013 published in August 2013. In discharging this condition the LPA expect to see details concerning pre-commencement checks and monitoring for protected and notable species, and habitats as deemed appropriate. In addition appropriate working practices and safeguards for other wildlife dependent on further survey work, that are to be employed whilst works are taking place on site. The agreed Construction and Environmental Management Plan shall thereafter be implemented in full for each phase. **Reason:** To ensure that protected species are not harmed by the development, in accordance with the National Planning Policy Framework (NPPF), ODPM Circular 06/2005 and Policies NE2 and NE3 of the Warwick District Local Plan 2011-2029.

12 No development of each phase shall commence until a Protected Species Contingency Plan has been submitted to and approved in

writing by the planning authority for that phase of development. The plan shall include:
a) Updated species surveys –
- Further bat survey of the trees (if trees in the pLWS Rowley Lane are to be impacted, or final plans show trees to be removed, sensitive areas impacted by lighting or significant period lapses);
- Updated checks of the buildings for bats;
- *Further* updated badger surveys;
- and other species where deemed appropriate.
b) If updated surveys record a protected species details will be required on development licences and appropriate mitigation strategy. The latter may result in changes to the proposed layout.
Reason: To safeguard the presence and population of protected species in line with UK and European Law, the National Planning Policy Framework and Policy NE2 of the Warwick District Local Plan 2011-2029.

Note: The outcomes of the surveys are likely to have implications for the design and/or layout of the development.

13 Each phase of the development hereby permitted shall not commence until a detailed Landscape and Ecological Management Plan has been submitted to and approved in writing by the District Planning Authority for that phase. The plan should include details of planting and maintenance of all new planting. Details of species used and sourcing of plants should be included. The plan should also include details of habitat enhancement/creation measures and management, such as water bodies, native species planting, wildflower grasslands; woodland creation/enhancement, provision of habitat for protected species. Such approved measures shall thereafter be implemented in full for that phase. **REASON**: To ensure a net biodiversity gain in accordance with NPPF.

14 No development shall be commenced until adequate measures have been taken to protect existing habitat within the potential Local Wildlife Site(LWS), Rowley Lane, during development. A barrier, such as a wire fence, should be erected before works start. This fenced area should include a suitable buffer zone between the development/associated works and the boundary of the LWS. Access to, or storage of materials within, this buffer zone must not be permitted. **Reason:** To ensure the protection of important habitats during development in accordance with Policy NE2 of the Warwick District Local Plan 2011 - 2029.

15 No phase of the development hereby permitted shall be commenced unless and until a scheme detailing how the development has been designed in accordance with the principles of 'Secured by Design Commercial 2015' (or any future national equivalent) for that phase, has been submitted to and approved in writing by the Local Planning Authority. In particular, when discharging this condition, the LPA expects to see the following information considered:

- Building sites and in particular, site offices and storage areas are becoming common targets for crimes such as theft of plant and fuel. These sites should be made as secure as possible.
- All plant and machinery should be stored in a secure area.
- Tools and equipment should be marked in such a way that they are easily identifiable to the company.
- Consideration should be given to the use of security patrols.
- Developers are requested to inform the local Safer Neighbourhood Policing Team, which covers the area of the development that they have arrived on site and provide contact numbers of the site manager for use in the case of an emergency.
- A grid reference for the site should be provided.

Each phase shall be carried out in accordance with the approved details and any approved security measures shall be retained in perpetuity.

Reason: To ensure a high quality design which is designed against crime and fear of crime, in accordance with the NPPF and Policy BE1 of Warwick District Local Plan 2011 - 2029.

16 Each phase of the development hereby permitted shall not commence unless and until a Construction Management Plan (CMP) has been submitted to and approved in writing by the local planning authority. The CMP shall provide information on:

- the anticipated movements of vehicles;
- the parking and loading/unloading of staff, visitor, and construction vehicles;
- the storage of plant and materials used in constructing the development;
- a turning area within the site for construction vehicles;
- wheel washing facilities and other measures to prevent mud/debris being passed onto the public highway;
- a construction phasing plan;
- a HGV routing plan for construction traffic and deliveries.;
- any temporary measures required to manage traffic during construction,
- plans and details of haul roads within the site and for the turning and unloading and loading of vehicles within the site during construction,
- dust management and suppression measures,
- odour management and suppression measures
- demolition or clearance works,
- noise assessment and mitigation method statements for the construction activities; in accordance with provisions of BS 5228:2009 Code of practice for noise and vibration control on construction and open sites – Part 1 and 2; concrete crusher if required or alternative procedure,
- delivery times,
- site lighting, access and protection arrangements around the site for pedestrians, cyclists and other road users,
- restrictions on burning and details of all temporary contractors buildings,

- plant and storage of materials associated with the development process,
- external safety and information signing notices,
- complaints procedures, including complaints response procedures and dedicated points of contact,
- membership of the considerate contractors scheme, and
- best practicable means shall be employed at all times to control noise and dust on the site, including specification for approval of the hours within which work which is likely to give rise to noise nuisance, and the arrival of delivery vehicles, are allowed.

A model CMP can be found on the Council's website (https://www.warwickdc.gov.uk/downloads/file/5811/construction_management_plan) or by searching 'Construction Management Plan'. The development hereby permitted shall only proceed in strict accordance with the approved CMP. **Reason:** In the interests of the safe and efficient operation of the strategic road network, highway safety, the amenities of the occupiers of nearby properties, the free flow of traffic and the visual amenities of the locality in accordance with the NPPF and Policies BE3, TR1 and NE5 of the Warwick District Local Plan 2011-2029.

17 No development shall take place other than in accordance with a phasing plan, or any subsequent revision to a previously approved phasing plan, which shall first have been submitted to and approved in writing by the Local Planning Authority. **Reason:** To define the permission in the interests of highway safety and impact on neighbouring amenity in accordance with Policies TR1, TR3 and BE3 of the Warwick District Local Plan 2011-2029.

18 No occupation and subsequent use of any phase of the development shall take place until a detailed maintenance plan is implemented and provided to the LPA giving details on how surface water systems shall be maintained and managed for the lifetime of the development of that phase. The name of the party responsible, including contact name and details shall be provided to the LPA within the maintenance plan. **Reason:** To ensure the future maintenance of the sustainable drainage structures in accordance with Policy FW2 of the Warwick District Local Plan 2011 - 2029.

19 Piling or any other foundation designs using penetrative methods shall not be permitted other than with the express written consent of the Local Planning Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to groundwater. The development shall be carried out in accordance with the approved details. **Reason:** To ensure the protection of Controlled Waters in accordance with Policy NE5 of the Warwick District Local Plan 2011 - 2029.

20 No infiltration of surface water drainage into the ground is permitted other than with the express written consent of the Local Planning

Authority, which may be given for those parts of the site where it has been demonstrated that there is no resultant unacceptable risk to controlled waters. **Reason:** To ensure the protection of Controlled Waters in accordance with Policy NE5 of the Warwick District Local Plan 2011 - 2029.

21 No construction or deliveries traffic during the construction phase will take place Monday to Friday during the following time periods 07:00 – 09:00 and 16:00 – 18:00 to minimise the impact construction traffic has on the operation of A45 and A46 Corridors, notably A45/A46/A444 Stivichall and A45/A46 Toll Bar End Junctions during the peak travel periods. **Reason:** To ensure the safe and efficient operation of the strategic road network in accordance with the NPPF and Policy TR1 of the Warwick District Local Plan 2011 - 2029.

22 Prior to occupation of the first phase of the development a Site Wide Travel Plan will be submitted and approved in writing by the Local Planning Authority in consultation with Highways England as Highway Authority for the A45 and A46 Corridors. The approved Site Wide Travel Plan shall be implemented in strict accordance with the approved details at all times thereafter. **Reason:** To promote the use of sustainable modes of transport and reduce the reliance upon car based journeys, in accordance with the NPPF and Policies TR1 and TR2 of the Warwick District Local Plan 2011 - 2029.

23 In respect of the Reserved Matters to be submitted in accordance with Condition 1, the building ridge heights and footprints and the overall Gross Internal Area of all building floorspace shall be within the maximum limits set down in approved Parameters Plan drawing no. 1618701-SPG-XX-XX-DR-A-111008. **Reason:** To define the permission in the interests of urban design and highway safety and capacity in accordance with Policies BE1 & TR2 of the Warwick District Local Plan 2011-2029.

24 The reserved matters to be submitted in accordance with Condition 1 for each phase shall include sample details of facing, roofing and hard surfacing materials for that phase. Thereafter the development shall be constructed in full accordance with such approved details or any amendment of these subsequently approved in writing by the local planning authority. **Reason:** To ensure that the proposed development has a satisfactory external appearance in the interests of the visual amenities of the locality in accordance with Policy BE1 of the Warwick District Local Plan 2011-2029.

25 Pursuant to condition one, in respect of each phase of development, any hard landscaping approved under any reserved matters consent, including boundary treatment, paving and footpaths, shall be completed in all respects within the 6 months of the first use of that phase of the development hereby permitted. In respect of each phase of development, any soft landscaping approved under any reserved matters consent, including any tree(s) and shrub(s), shall be planted

within the first planting season following that first use of that phase. Any tree(s) or shrub(s) removed, dying, or becoming in the opinion of the local planning authority seriously damaged, defective or diseased within five years from the substantial completion of that phase of development shall be replaced within the next planting season by tree(s) or shrub(s) of the same size and species to those originally required to be planted. All hedging, tree(s) and shrub(s) shall be planted in accordance with British Standard BS4043 - Transplanting Root-balled Trees and BS4428 - Code of Practice for General Landscape Operations. **Reason:** To ensure a satisfactory standard of appearance of the development in the interests of the visual amenities of the area in accordance with Policies BE1, BE3 and NE4 of the Warwick District Local Plan 2011-2029.

26 The reserved matters to be submitted in accordance with Condition 1 shall be accompanied by details of showering and changing facilities for employees working or visiting. Thereafter such approved facilities shall be provided in the construction of the development at all times following the first occupation. Those facilities shall remain in place and be available for use at all times thereafter. **Reason:** To promote sustainable transport choices in accordance with Policy TR1 of the Warwick District Local Plan 2011-2029.

27 No lighting or illumination of any part of the building or site shall be installed for each phase of the development until a detailed lighting scheme has been submitted and agreed between the applicant and the local planning authority for that phase. In discharging this condition the District Planning Authority expects lighting to be restricted around the boundary edges, along the pLWS Rowley Lane wooded belt, any trees, hedgerows, around any known bat roosts and badgers setts, and to be kept to a minimum at night across the whole site in order to minimise impact on emerging and foraging bats and other nocturnal wildlife. This could be achieved in the following ways:
• Lighting should be directed away from vegetated areas
• Lighting should be shielded to avoid spillage onto vegetated areas
• The brightness of lights should be as low as legally possible;
• Lighting should be timed to provide some dark periods;
• Connections to areas important for foraging should contain unlit stretches.

The lighting scheme must include:
- a layout plan detailing the position and type of the proposed lighting for both the construction and operational phase lighting. This should incorporate a zone of influence contour plan showing illuminance levels in relation to residential receptors prior to work starting. The lighting assessment should provide maximum vertical illuminance levels at nearby residential receptors.
- mounting heights and beam orientation, description and type of luminaries / lamp and angle of lighting and predicted light spill/ trespass beyond the site.
- steps taken to minimize light trespass, glare and sky glow.

- proposed time of operation of the lighting in the scheme including details of any control such as movement detectors and timers.
- purpose of the lighting – e.g. general amenity, security, advertising.

The lighting shall be carried out and operated only in full accordance with those approved details. **Reason:** To ensure that any lighting is designed and operated so as not to detrimentally affect the amenities of the occupiers of nearby properties and to safeguard the presence and population of protected species in line with UK and European Law, the National Planning Policy Framework and Policies BE3 and NE2 of the Warwick District Local Plan 2011-2029.

28 No phase of the development hereby permitted shall be occupied until a scheme which satisfies the requirements set out in the Council's adopted Air Quality and Planning Supplementary Planning Document (January 2019) for that phase has been submitted to and approved in writing by the Local Planning Authority and implemented in full accordance with the approved details. The approved scheme shall be retained and maintained as such 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.

29 Noise arising from any plant or equipment (measured as LAeq,5 minutes), when measured one metre from the façade of any noise sensitive premises, shall not exceed the background noise level (measured as LA90,T). If the noise in question involves sounds containing a distinguishable, discrete, continuous tone (whine, screech, hiss, hum etc) or if there are discrete impulses (bangs, clicks, clatters, thumps etc.) or if the noise is irregular enough to attract attention, 5dB(A) shall be added to the measured level. **Reason:** To protect the amenities of the occupiers of nearby properties in the locality in accordance with Policy BE3 of the Warwick District Local Plan 2011-2029.

30 The development shall not be occupied until the vehicular access and emergency vehicular access into the application site have been provided, in accordance with Drawing Number 05232-j-0100-P3 (Preliminary Access Proposals) and constructed to the standard specification of the Local Highway Authority. **Reason:** In the interests of highway safety and the free flow of traffic in accordance with Policy TR1 of the Warwick District Local Plan 2011-2029.

31 No development shall be occupied until the estate roads (including footways) serving it have been laid out and substantially constructed to the satisfaction of the Highway Authority in accordance with details approved in writing by the Local Planning Authority. **Reason:** In the interests of highway safety and the free flow of traffic in accordance with Policy TR1 of the Warwick District Local Plan 2011-2029.

32 The accesses to the site shall not be constructed in such a manner as to reduce the effective capacity of any drain or ditch within the limits of

the public highway. **Reason:** In the interests of highway safety in accordance with Policy TR1 of the Warwick District Local Plan 2011-2029.

33 Prior to the submission of any reserved matters application for any phase of the development, a Parking Strategy for that phase shall be submitted to and approved in writing by the local planning authority. The approved Parking Strategy shall thereafter be implemented in strict accordance with the approved details. **Reason:** To ensure adequate off-street car parking and servicing facilities in the interests of highway safety in accordance with Policies TR1 and TR3 of the Warwick District Local Plan 2011-2029.

34 No phase of the development hereby permitted shall be occupied unless and until the car parking and manoeuvring areas, and secure cycle parking area indicated on the approved drawings as part of the reserved matters process for that phase have been provided and thereafter those areas shall be retained and kept marked out and available for such use at all times. **Reason:** To ensure adequate off-street car parking and servicing facilities in the interests of both highway safety and visual / residential amenity in accordance with Policies BE1, BE3 and TR3 of the Warwick District Local Plan 2011-2029.

35 Each reserved matters application shall include for a scheme of cycle parking to meet the minimum requirements of the Warwick District Parking Standards. **Reason:** To ensure adequate cycle storage facilities are provided in the interests promoting sustainable transport patterns in accordance with Policy TR1 of the Warwick District Local Plan 2011-2029.

36 Prior to occupation of any building within the development hereby permitted, access on Bubbenhall Road, Stoneleigh Road and Coventry Road for the vehicles of employees, HGVs and other service/delivery vehicles to the site, shall be restricted and enforced in full accordance with an Access Restriction Strategy (taking into account the provisions included with in the strategy for Gateway South) that shall be submitted to and approved in writing by the Local Planning Authority. Thereafter the monitoring and enforcement of the approved Strategy associated with the development shall be managed in full accordance with this approval unless otherwise agreed in writing by the Local Planning Authority. **Reason:** To ensure that HGV and employee traffic does not result in a detrimental impact on amenity and in the interests of both highway safety and residential amenity in accordance with Policies BE3 and TR1 of the Warwick District Local Plan 2011-2029.

37 In pursuance of condition 1 above, the details submitted shall be in accordance with the Green Infrastructure Strategy (Appendix 11.9 of the Environmental Statement), submitted with the application. **Reason:** In accordance with Policies NE1 and NE4 of the Warwick District Local Plan 2011 - 2029.