

## **OFFICER REPORT**

<b>Planning Committee Report</b>	
<b>Planning Ref:</b>	OMES/2021/2268
<b>Site:</b>	Coventry Airport, Rowley Road, CV3 4FR
<b>Ward:</b>	Binley and Willenhall
<b>Proposal:</b>	Outline planning application with all matters reserved apart from access (which is submitted in detail) for the development of a battery manufacturing facility with ancillary battery recycling capability including landscaping, car parking, access and associated works. The application is accompanied by an Environmental Statement. The proposed development may not accord with the provisions of the Development Plan in force in the area in which the land to which the application relates is situated. (Departure Application) This is a cross-boundary planning application, meaning that the site is also located within Warwick District and therefore an identical planning application has been made to Warwick District Council
<b>Case Officer:</b>	Daniel Taylor

### **INTRODUCTION**

Coventry Airport is owned by Coventry City Council (CCC). Coventry Airport Ltd (CAL) have a long leasehold interest in, and operate, the airport. Both parties are the Applicant for this application and have entered a Joint Venture Arrangement to promote and develop the airport for a Gigafactory. The Gigafactory would occupy the entirety of the airport site with all airport related operations and the businesses operating from the site ceasing.

A “Gigafactory” is a facility to manufacture batteries for electric vehicles and a range of other applications at scale. Due to the global demand for battery production, this is only set to keep rising. Gigafactories are now the established method for battery production by manufacturers. There are currently no such facilities of anything approaching this scale in the UK, although Gigafactories have been delivered in the United States, Europe, and Asia. The applicant 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 states that the West Midlands has been chosen as a potential location for a UK Gigafactory due to its mature automotive sector; emerging specialism in battery technology; strength in manufacturing, research and development; skilled and available workforce; and location in the centre of the country. Coventry Airport has been identified as the preferred site for a West Midlands Gigafactory by the West Midlands Combined Authority, Coventry City Council, Warwick District Council,

Warwickshire County Council, and Coventry and Warwickshire Local Enterprise Partnership (LEP), via their representation on the West Midlands Electrification Taskforce.

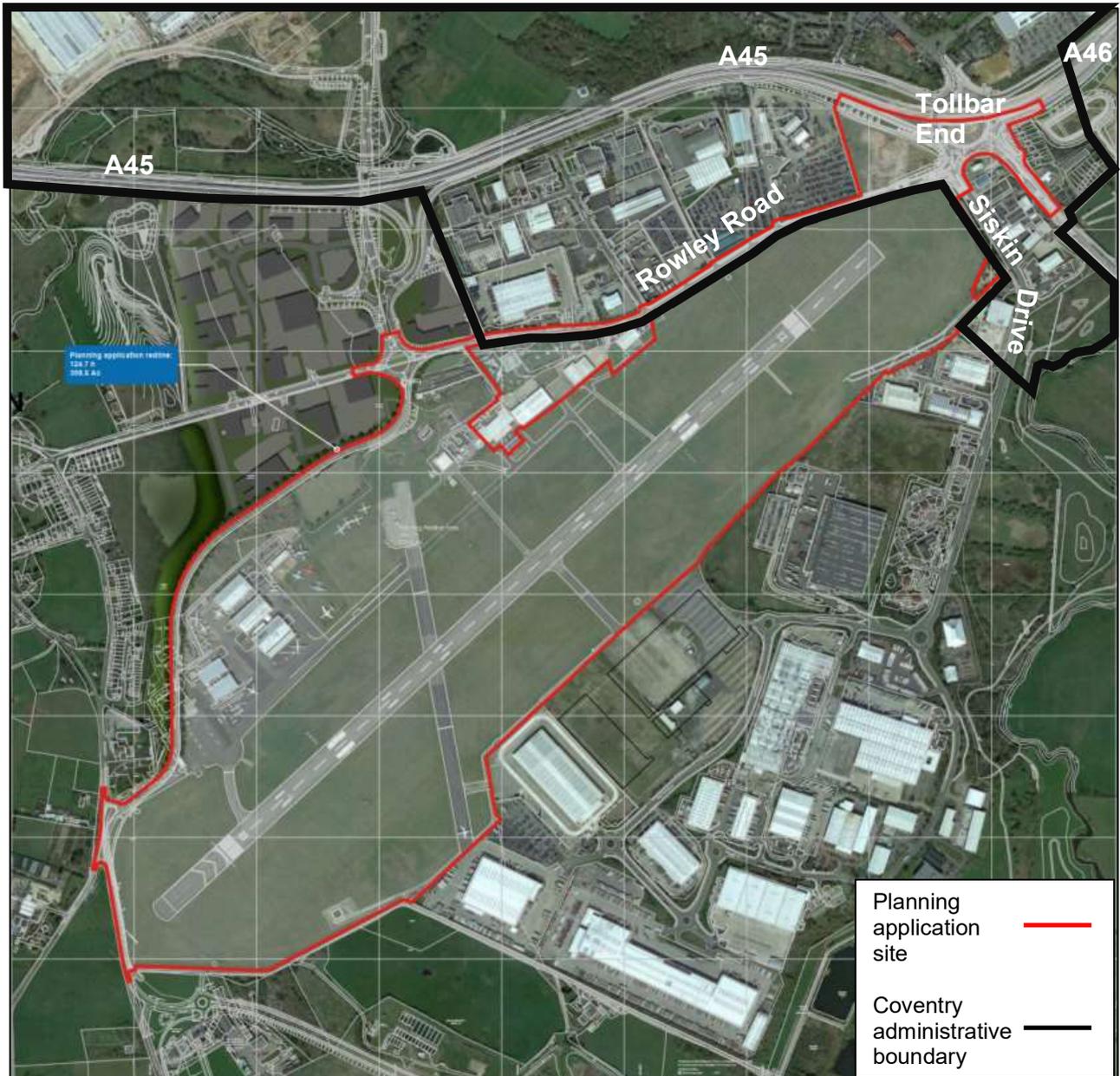
The application is an Outline application with all matters reserved for future determination save for the principal means of access to the site. Whilst the detail for the majority of the proposal is yet to be submitted, parameters are set as part of this Outline application which define the extent of the type, scale and distribution of the development proposed on the site, within which future Reserved Matters applications will be submitted. The parameters set for aspects such as the factory's height, overall size, and distribution of massing around the site, have been influenced by a knowledge of the likely future market and processes involved in operating such a facility. The likely future operator is not yet known and discussions on this remain commercially confidential at this stage.

The application has been submitted to both Coventry City Council (CCC) and Warwick District Council (WDC) because the application site lies within the administrative areas of both local authorities. In this regard, WDC and CCC have authority to approve (subject to the Secretary of State not wishing to intervene) or refuse planning permission only in respect of those parts of the application site within their respective administrative areas. Therefore, in order for the development proposals to progress the Planning Committees of both authorities would need to resolve that they were minded to grant planning permission for that part of the development in their administrative area.

The majority of the site falls within the administrative control of WDC with only the road network along Rowley Road, Siskin Drive and the A45 around Tollbar End roundabout located within Coventry City Council's administrative boundary. This is shown in Figure 1 below. As a result, WDC are the lead authority for determining the application.

The proposal is of a scale that has the potential to lead to environmental impacts and as a result requires an Environmental Impact Assessment (EIA). A formal Scoping Opinion was carried out under the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (the EIA Regulations), Regulation 15, where WDC were invited to take the lead role in the scoping process and provide the Scoping Opinion in a form agreed with CCC. The Environmental Statement has been prepared accordingly and is submitted with the application.

By virtue of it only being the road network that falls into CCC's administrative boundary this report focuses on the principle of the development, Green Belt consideration, Highway infrastructure and road safety issues and the environmental impact of the development. In addressing these issues this report seeks to assess the application in its entirety whilst also advising Members clearly regarding those parts of the application site and proposal over which they have jurisdiction. Advice is also provided on which planning policies apply and are therefore to be considered by Members in determining that part of the scheme in their local authority administrative area. Other issues will be lead on and assessed by WDC.



*Figure 1 – Application site*

If the Planning Committees of both Warwick District Council and Coventry City Council resolved that they were minded to grant planning permission, the applications would then need to be referred to the Secretary of State for Levelling Up, Housing and Communities, prior to determination by virtue of it being Green Belt development under the Town and Country Planning consultation England Direction 2021, who would decide whether or not to call in the applications.

Should the Secretary of State decide to call in the applications, there would be a public local inquiry before an Inspector, who would, following that inquiry, make a recommendation to the Secretary of State, who would then make his decision on the applications having regard to the Inspector's recommendation.

If the Secretary of State decided not to call in the applications, they would be referred back to Warwick District Council and Coventry City Council who would then grant planning permission in respect of those parts of the scheme in their respective administrative areas subject to conditions and a Section 106 Agreement being entered into by the developer with the District and County Councils and City Council.

If either of the Planning Committees resolved to refuse planning permission in respect of that part of the scheme in their respective administrative area, then the applicant would have a right of appeal to the Planning Inspectorate against such refusal.

Should one of the authorities resolve that they are minded to grant planning permission and the other authority resolved to refuse planning permission then the authority which had resolved that they were minded to approve the application would refer their application to the Secretary of State. Should the applicant decide to lodge an appeal against the decision of the other authority to refuse the application, the Secretary of State would then need to decide whether or not to arrange a public local inquiry to consider both the referred and refused applications together.

## KEY FACTS

Reason for report to committee:	More than 5 objections have been received and departure to Coventry Local Plan
Current use of site:	Airfield / airport for light pleasure craft, aviation businesses and
Proposed use of site:	Mass battery manufacturing centre (B2 use) – “Gigafactory”

## RECOMMENDATION

Planning Committee are recommended to resolve that:

1. they are minded to approve those elements of the application within the administrative area of Coventry City Council subject to conditions, a Section 106 Agreement being entered into by the applicant in respect of those matters, including matters where further clarification is awaited, as highlighted in this report which relate directly to those matters under the City Council’s jurisdiction, and the Secretary of State not wishing to intervene regarding determination of the application; and
2. Delegated authority be given to the Strategic Lead (Planning) to issue the planning permission together with the power to make any amendments to the conditions and any contributions set out within the report, which are considered necessary in relation to Application OMES/2021/2268

## REASON FOR DECISION

- The proposal is acceptable in principle.
- The proposal will not adversely impact upon highway safety.

- The proposal will not adversely impact upon the amenity of neighbours.
- The proposal accords with policies set out in the Coventry Local Plan 2016, together with the aims of the NPPF.

## **SITE DESCRIPTION**

The site is approximately 125ha (309 acres) and extends from Bubbenhall Road to the south-west to the junction of Rowley Road, Siskin Drive, and the A45 at Tollbar End roundabout to the north-east. The site encompasses the whole of the Coventry Airport site, which comprises the 2km long airport runway, taxiways, airfield, six aircraft stands/hangers in the north-west corner of the site, and a series of 2-3 storey buildings occupied by aviation related businesses as well as uses that include industrial shed type buildings and the airport control tower along the north side of the runway. The site also includes a new link road that has been formed around the western edge of the airport to serve the new Whitely South employment development by bypassing the village of Baginton and sections of highway that border the site that includes Bubbenhall Road to the south and Rowley Road to the north from its junction with Firefly Road to Siskin Drive and Tollbar End Roundabout. The site also includes part of the A45 and A46 that travels through Tollbar End. This is to establish appropriate links between the airport site and the surrounding road network.

The airport site is within the Green Belt and falls within the administrative area of WDC. The highway infrastructure along Rowley Road and Tollbar End are within the administrative area of CCC.

Between the airport site and Rowley Road is located the recently developed UK Battery Industrialisation Centre (UKBIC) and the Midland Air Museum, which are located outside of the application site. Between Rowley Road and the A45 Stonebridge Highway to the north of the site lies the employment area of the Stonebridge Trading Estate. To the north of Tollbar End is the London Road and the southern suburbs of Coventry – Whitely and Willenhall and to the north of the A45 is Jaguar Land Rover's Whitely Headquarters. To the north-west of the site lies the village of Baginton and the Coventry suburb of Finham beyond.

Immediately to the south and south-east of the site lies the existing employment areas of Middlemarch Business Park and the more recently completed Imperial Park around Siskin Drive and Siskin Parkway, sewage works and employment development currently under construction. Land further to the east, south and west largely comprise open countryside, much of which is within the Green Belt with the River Avon running close by and the settlements of Ryton-on-Dunsmore, Bubbenhall and Stoneleigh within the vicinity.

### **The Airport**

Traffic using the Airport mainly consists of light aircraft, both fixed wing and helicopters, conducting pleasure flying, maintenance and flying training. Occasional business jets are handled. The Air Ambulance station is located at the airport with their flights also taking place. No passenger or freight traffic operates.

The application states that Civil Aviation Authority (CAA) records for 2019 (the last complete year before the pandemic for which records are available) identify 31,708 aircraft movements at Coventry Airport compared with 74,556 at East Midlands and 109,357 at Birmingham Airports. The latter two operate passenger and freight traffic at volume and the vast majority of those movements will involve very much larger aircraft as well as relatively few 'pleasure

flights'. As such, Coventry carries a significantly smaller volume, as well as a different type, of traffic in comparison with other nearby airports.

The application submitted would therefore mean that if approved the Airport would close and all activity operating out of it would cease.

In this circumstance the CAA would expect to see an action plan, including an appropriate Safety Management System Risk Assessment, UK Aeronautical Information Publication (AIP2) notification of removal of the Air Traffic Zone conducted through Airspace Regulation, removal of runway markings, and "handing back" Aerodrome and Air Navigation Service Provider licences and certificates. The UK AIP would need amending to remove all entries relating to Coventry. In addition, there will be a need for the existing aviation operations presently based at Coventry to relocate elsewhere. The applicant has stated that there are a variety of realistic options open to such operators as well as a reasonable lead in time.

## **APPLICATION PROPOSAL**

The application is for a comprehensive redevelopment of the site to accommodate a Gigafactory and related development.

The planning application is submitted in outline with all matters reserved for subsequent approval other than the principal means of vehicular access to the Site, which are submitted in detail. Matters of appearance, layout, scale, and the detailed landscaping of the Site are to be the subject of subsequent reserved matters submission. Parameters for these reserved matters have been submitted which together define an "envelope" within which the details of development will later be established via the reserved matters process. These parameters relate, for example, to the maximum horizontal and vertical extent of development that will be allowed, the use of the site, maximum floorspace and maximum landscaping areas. The parameters have been formulated based on an understanding of the likely market for such a facility. Discussions around the end user are currently commercially confidential, however the applicant seeks to stress that there is exceptionally strong market interest in bringing the scheme forward quickly within the submitted parameters should permission be granted.

As explained in the introduction above, a Gigafactory is a very large battery manufacturing facility, producing batteries for electric vehicles and a range of other applications at scale. The facility needs to be of a scale of this size due to the global trend amongst battery manufacturers towards operating the full battery development process with a "vertically integrated" design that incorporates input and output processes and supply chains. For the scheme this means including an allowance for colocation manufacture on the site of Cathode Active Material (CAM) and Precursor CAM production at the start of the process and recycling of the batteries at the end of the process where materials can be recovered and used to again to make new batteries. This is known as "cradle to cradle" operation and ensures an integrated process delivering a comprehensive battery production and waste solution on site.

The proposal is being designed so that at full capacity the factory will deliver 60GWh per annum of battery output. Initially this will be primarily directed to electric vehicle manufacture (private and commercial), however, there will be other areas where it is expected that large scale battery production will be required and as a result the applicant sees it as essential that the UK secures battery manufacturing capability.

The UK is currently lagging behind the USA and other nations in Europe in battery production. There are currently no examples anywhere in the UK of Gigafactory development producing batteries at great scale, and only two (including this proposal) are currently making their way through the planning process. Government policy seeks rapid expansion of Gigafactory provision and to create domestic capacity before 2030 with the growth forecast for this sector identified as being substantial and sustained. The applicant points to the risk of significant contraction and job losses and opportunities, particularly in the automotive sector as production moves overseas if domestic capacity is not ramped up.

The demand for batteries is immediate and growing and with it means Gigafactory technology and requirements are fast evolving. This means that there is absolute certainty of the imperative for Gigafactory development, but at this early stage in the process flexibility is required in terms of the final form the Gigafactory will take in order to respond to the UK market and why the parameter approach is a crucial part of the application. It also allows for an outcome if demand accelerates faster than currently anticipated or to start off with a reduced function and production capability at the outset, with the parameters allowing for growth as the market and technology matures.

### Phased development

The proposal will be a phased development, with the detail of the exact phasing to be submitted as part of the reserved matters stage, however an indicative two phased development is currently being shown with the site split pretty much down the middle. This indicative phasing is considered logical as the current proposal is for a two-building approach with the phasing splitting the site between the two buildings. The north-east half closest to Tollbar End would be delivered first as Phase 1 and the south-west half closest to Bubbenhall Road would be delivered as Phase 2.

Both phases would include the battery production line with Phase 1 comprising the early process element of PCAM/CAM manufacture and Phase 2 comprising the battery recycling facility, which is logical as electric vehicle car batteries current last around 7 years and the time frame provided by the applicant for the Gigafactory to be at full operational level is between 4 and 7 years. Both phases would comprise corporate offices, staff car parking, new public open space, and logistics / HGV services. Phase 1 would also include the energy centre.

### Detailed element

The site would provide six points of vehicle access; two primary signal-controlled junctions and four secondary priority controlled (give-way) junctions as follows:

1. Rowley Road just west of Tollbar Island – primary access
2. Rowley Road just east of Firefly Road midway along the northern edge of the site – secondary access
3. New link road around the western edge of the existing runway to the rear of the UKBIC – primary access
4. New link road around the western edge of the existing runway midway along – secondary access

5. New link road around the western edge of the existing runway close to existing airport vehicle access – secondary access
6. Bubbenhall Road, just south of the existing airport vehicle access and Stoneleigh Road junction – secondary access

The primary access points will provide access for the majority of staff cars, operational vehicles and potentially any public transport/private shuttle services, as appropriate. The secondary access points will provide access to a limited amount of car parking and smaller service yards. 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. Pedestrians will be accommodated via dedicated footways and crossing facilities integral into each access point. Cyclists will be provided with a segregated two-way cycle track which connects the existing shared provision adjacent to the development site. Cyclists will also be accommodated within the junction design and provided with protection under their own signal in a straight across movement where possible. Furthermore, cyclists will be brought into the site away from the primary HGV access point (adjacent to Tollbar End) to reduce the opportunity for conflict.

#### Outline element - Parameters

The application seeks outline approval for a maximum total floor area of 529,648sqm (5,700,600sqft) GIA of accommodation to be developed in B2 use for battery manufacture with associated ancillary activities. The parameters define three zones comprising Zone 1 and Zone 2, which will accommodate built development and a landscape zone which comprises an extensive landscaped buffer around the parameter of the site.

Zone 1 occupies the western, northern, and eastern part of the Site to be developed. It extends to about 62.9ha and would have a maximum floorspace of 379,648sqm GIA. 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 ranging from 2-10m depending on location.

Zone 2 occupies the central / southern part of the Site to be developed. It extends to about 17ha and would have a maximum floorspace of 150,000sqm GIA. 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 ranging from 2-10m depending on location. Zone 2 will house the Pre-cursor Cathode Active Material (PCAM) and a Cathode Active Material (CAM) Plant which would produce the materials to form one of the active materials in the formation of batteries. These chemicals are then coated onto metal laminates and enter the battery production line.

The landscape buffer would extend to 35.3ha and would encircle Zones 1 and 2, varying in width with the broadest parts located at the western and eastern ends of the Site. These could rise to 10m high and 75m wide acting as a screen, particularly to the west. 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.

The parameters allow for the built form to comprise one large unit or divided into up to 8 units. The Design and Access Statement shows the initial concept masterplan comprising a single building option and a three building option to satisfy the requirements of the end user, however, a two building option has formed the basis of an indicative masterplan incorporating the production buildings and ancillary facilities to allow for the Cradle to Cradle production and recycling of batteries and distribution of car parking.

While the detailed design of the Scheme will be resolved via the reserved matters process, the proposed theme for the design is to echo the runway strip through the built form and continue / retain it through the landscaping and road infrastructure. This is proposed by the applicant as a nod to the existing use, which as a design concept is supported by officers for this outline stage. It is also intended for the building design to not be overly detailed or fussy and very much has a manufacturing language that represents the technological and manufacturing processes going on inside the building.

A security perimeter fence will be provided with numerous control gates for staff personnel along the security fence line to ensure the site is secure, particularly during the staggered shift patterns and change overs. In terms of promoting sustainable modes of transport, these gates will be located next to active travel nodes, so employees have to walk past cycle shelters and bus stops before car parks. In addition, contributions towards sustainable forms of travel, which will be pooled with other contributions from neighbouring developments will allow improved direct bus connectivity to the site from Coventry and Warwickshire with opportunities for interchanging between bus services and rail services.

The applicant is cognisant of the facilities purpose and its vital contribution to the UK's climate response and therefore sees it as vital to ensure that the delivery, use and management of energy is of a sustainable source with carbon emissions effectively mitigated. 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 on the roof of the factory and within the landscaping areas, which will be optimized through the use of network storage arrays including on site battery technology to assist in peak load management. Electric vehicle charging points on site will be maximised to support the future electrification of vehicle manufacture.

### Landscaping

The closure of the airport provides an opportunity to provide more diverse landscaping and habitats that will attract birds and other wildlife to the site as there would no longer be restrictions on landscaping (currently imposed by the Civil Aviation Authority to minimise the potential for bird strikes with aircraft). Of the 35.3 hectares of land around the built development a mix of open space, SuDS, amenity land and rain gardens would be provided. This would be provided as a mix of private and public spaces. The majority of the open space and landscape buffer adjacent to Rowley Road, the western link road and Bubbenhall Road would be publicly accessible.

The parameters underline the point that the application is not to secure planning permission for a specific form of development, but rather to provide sufficient flexibility such that a range of potential options can be delivered through the reserved matters application that can

respond to the rapidly growing and evolving market to ensure the site delivers the most appropriate form of development and its potential can be fully realised to the benefit of Coventry and Warwickshire and the wider UK renewable and automotive sectors.

## **PLANNING HISTORY**

There is no planning history directly associated with the site, which is of immediate relevance to the current proposals, however, the land immediately surrounding the site has been the subject of a number of planning approvals, granted by WDC. The most relevant being two large parcels of land which are associated with the sub-regional employment allocation made by the adopted Warwick District Local Plan (adopted September 2017). Warwick District Local Plan removed land to the north and south of the site from the Green Belt but left the airport within it. These employment allocations are referred to as “Coventry Gateway” with the land to the south of the airport site known as “Gateway South” and the land to the north of the airport site known as “Whitely South”. The two parts will be joined by the new link road that forms part of the application site running to the west of the runway. Planning permission for employment use has been secured on both parcels of land and both are under construction.

The Whitely South permission, which covers an area of 105ha immediately to the south of the A45 Stonebridge Highway and north of Rowley Road was granted Outline consent on 10th July 2017 (WDC ref. W/16/0239 and CCC ref. OUT 2016/0405) for the erection of offices, research & development facilities and light industrial uses (Use Class B1), hotel accommodation (Use Class C1), car showroom, small scale retail and catering establishments (Use Classes A1, A3, A4 and/or A5) and new countryside park, along with new roads/footpaths/cycle routes and, remodelling of junctions on the existing highway network and related to the expansion by Jaguar Land Rover (JLR), who were also joint applicant. While the remodelling of the existing highway network has been completed, the development across the rest of the site is yet to commence while JLR seek variations to the original permission.

Part of the Whitely South site that has been developed and completed is the UKBIC facility, which is fully operational and approved under WDC reserved matters ref. W/18/1717.

The Gateway South permission, which covered an area of 183ha was granted outline consent on 7th October 2019 (WDC ref. W/18/0522) for general industrial uses (Use Class B2) and storage and distribution (Use Class B8) and the creation of a community park and replacement sports ground that comprises the creation of new sports pitches, flood lighting and club house, all of which is currently under construction.

A separate approval for employment use, which was granted outside of the Green Belt as an extension to the Middlemarch Business Park was approved in October 2015 in Outline for 650,000sqft of employment accommodation (ref. W/15/1122) and in June 2016 for the reserved matters comprising three industrial units (ref. W/16/0354). This was referred to as Imperial Park and runs along the south-east border with the airport site, accessed off Siskin Parkway West.

To the west of the site on the opposite side of Coventry Road is WDC’s housing allocation site at Rosswood Farm, of which the northern half of the site has been granted planning

permission for the construction of 56 new affordable houses. The site is greenfield but is no longer part of the Green Belt by virtue of the housing allocation that forms part of Baginton village being classified as a growth village.

## **POLICY**

Applications for planning permission must be determined in accordance with the Development Plan unless material considerations indicate otherwise, in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004.

In this instance, the Development Plan for the site comprises the:

- Coventry Local Plan (CLP) 2011-2031 (adopted in December 2017)
- Warwick District Local Plan (WDLP) 2011-2029 (adopted in September 2017).

Other policy documents that are material considerations in the determination of planning applications include the National Planning Policy Framework (NPPF), National Planning Policy Guidance (NPPG), the Coventry Supplementary Planning Documents and Warwick District Supplementary Planning Documents (SPDs).

### **National Planning Policy**

The National Planning Policy Framework (NPPF), of which the latest revision came into effect on 20<sup>th</sup> July 2021, sets out the Government's planning policies for England and how these are expected to be applied. Paragraph 2 confirms that planning applications should be determined in accordance with the development plan unless material consideration indicate otherwise and that the NPPF is a material consideration in planning decisions.

It confirms in paragraph 7 that *"the purpose of the planning system is to contribute to the achievement of sustainable development"* with paragraph 8 setting out that in order to achieve this three interdependent and overarching objectives are set which are expressed as economic, social and environmental objectives and which need to be pursued in mutually supportive ways. Paragraph 9 emphasises how these objectives should be delivered and states that *"planning decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account."*

In terms of decision making, the overarching theme within the NPPF is a presumption in favour of sustainable development (paragraph 11), which the Government has advised should be at the heart of the planning system. Paragraph 11 goes onto state that developments that accord with an up-to-date development plan should be approved without delay.

Paragraph 12 emphasises that the Development Plan should be *"the starting point for decision-making"*, but that *"Local Authorities may take decisions that depart from an up-to-date development plan where material considerations in particular case indicate that the plan should not be followed."* Paragraph 38 talks about the decision-making process and that Local Authorities should *"work proactively with applicants to secure developments that will improve*

*the economic, social and environmental conditions of the area” and “to approve applications for sustainable development where possible.”*

Section 6 of the NPPF seeks to build a strong, competitive economy with paragraph 83 making the point that *“decisions should recognise and address the specific locational requirements of different sectors”, including, “making provision for clusters or networks of knowledge and data-driven, creative or high technology industries.”*

Section 11 seeks to make effective use of land, including support where appropriate for alternative uses of land where the proposed use would contribute to meeting an unmet need for development in the area.

Section 13 seeks to protect Green Belt land and paragraph 147 seeks to resist inappropriate development that would be harmful to the Green Belt except in “very special circumstances”. Paragraph 148 states 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.”* The NPPF identifies that elements of many renewable energy projects will comprise inappropriate development when located in the Green Belt, with paragraph 151 stating that in these circumstances *“very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.”*

Section 14 seeks to meet the challenge of climate change with paragraph 152 stating that *“The planning system should support the transition to a low carbon future...” “and support renewable and low carbon energy and associated infrastructure.”*

Section 15 seeks protection from pollution and makes the point in paragraph 188 about the role of the planning system. stating that *“decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes). Planning decisions should assume that these regimes will operate effectively.”*

The National Planning Practice Guidance (NPPG) adds further context to the NPPF and it is intended that the two documents are read together.

## **Local Planning Policy**

In terms of assessment of the application proposals it should be noted that Coventry City Council planning policy applies only to those parts of the application site within Coventry City Council's administrative area whilst the Warwick District Council and Warwickshire County Council planning policies apply only to those areas of the site within Warwick District Council's jurisdiction. The NPPF applies to the entire site.

WDC are currently undertaking a review of their Local Plan (Update relating to Policy DS19, published on 31<sup>st</sup> March 2021), which has resulted in the Council working with Stratford-on-Avon District Council to prepare a new local plan for South Warwickshire, which will ultimately result in a single plan covering both District Council authority areas and thereby replacing the WDCLP.

Relevant Coventry City Council emerging Local Plan Policies:

- DS1: Overall Development Needs
- DS2 The Duty to Cooperate
- DS3 Sustainable Development Policy
- HW1 Health Impact Assessments
- JE1 Overall Economy and Employment Strategy
- JE2 Provision of Employment Land and Premises
- JE5 Location of R&D, Industrial and Storage/Distribution Development
- JE7 Accessibility to Employment Opportunities
- GB1 Green Belt and Local Green Space
- GE1 Green Infrastructure
- GE2 Green Space
- GE3 Biodiversity, Geological, Landscape and Archaeological Conservation
- GE4 Tree Protection
- DE1 Ensuring High Quality Design
- AC1 Accessible Transport Network
- AC2 Road Network
- AC3 Demand Management
- AC4 Walking and Cycling
- AC5 Bus and Rapid Transit
- EM1 Planning for Climate Change Adaption
- EM2 Building Standards
- EM4 Flood Risk Management
- EM5 Sustainable Drainage Systems (SuDS)
- EM6 Air Quality
- IM1 Developer Contributions for Infrastructure

**CCC Supplementary Planning Guidance/ Documents (SPG/ SPD):**

Air Quality SPD

Coventry Connected SPD

Delivering a More Sustainable City SPD

Relevant Warwick District Local Plan Policies are as follows:

- DS1 Supporting prosperity
- DS3 Supporting sustainable communities
- DS4 Spatial Strategy
- DS5 Presumption in favour of sustainable development
- DS8 Employment Land
- DS9 Employment Sites to be Allocated
- DS16 Sub-regional Employment Site
- DS19 Green Belt
- PCO Prosperous Communities
- SCO Sustainable Communities

- BE1 Layout and Design
- BE3 Amenity
- TR1 Access and Choice
- TR2 Traffic generation
- TR3 Transport Improvements – contributions where necessary
- TR4 Policy – accord with Statement
- TR6 Safe Operation of Aerodromes
- HS1 Healthy, safe, and inclusive communities
- HS2 Protecting open space, sport, and recreation facilities
- A58 Protecting Communities Facilities
- CC1 Planning for Climate Change adaptation
- CC3 Building Standards Requirements
- FW1 Development in Areas at Risk of Flooding
- FW2 Sustainable Urban Drainage
- FW3 Water efficiency
- FW3 Water supply
- HE1 Listed Buildings
- HE2 Conservation Areas
- HE6 Archaeology
- NE2 Protecting biodiversity and geodiversity Assets
- NE3 Biodiversity
- NE4 Landscape
- NE5 Natural Resources
- DM1 Infrastructure Contributions

**WDC Supplementary Planning Guidance/ Documents (SPG/ SPD):**

Air Quality and Planning SPD

Developer Contributions SPD

**WDC Neighbourhood Plans**

Baginton and Bubbenhall

**CONSULTATION RESPONSES**

No Objections received from:

- NATS
- Urban Design and Landscape
- Sustainability (Energy)
- Streetscene and Green Spaces
- Planning Policy

No objections subject to conditions/contributions have been received from:

- Highways England
- West Midlands Fire Service
- Cadent
- Highways
- Environmental Protection

- Economic Development Service
- Ecology

Objections have been received from:

- Warwickshire Wildlife Trust object to the application as it stands and wish to see further surveys and biodiversity impact assessment.

**In addition to the consultation responses made to Coventry City Council, the following were made to Warwick District Council**

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

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 be 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 farmland stripped of topsoil, 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.

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

## **PUBLIC CONSULTATION RESPONSES**

Notification letters were sent to surrounding neighbouring properties, to Leaf Lane, Finham and Whitley Residents Associations and to local councillors on 10<sup>th</sup> August 2021, a press notice was published on 19<sup>th</sup> August and site notices were put up outside the site, around Toll End, along London Road, Siskin Drive, Rowley Road and in Baginton Village along Coventry Road and Kimberley Road/Church Road on 31<sup>st</sup> August 2021 and 21<sup>st</sup> September 2021. 67 representations have been received by Coventry City Council (2 in support, 1 commenting and 64 objecting). A number of representations were made direct to Warwick District Council as they are leading on the application and some of those are from Coventry residents. Therefore, for completeness, the following is a summary of representations made to both authorities: -

### **Objections**

261 Objections made directly to Warwick District Council and 64 to Coventry. Of the 261 to Warwick, where addresses are 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. These raise the following concerns: -

### **Royal Mail**

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 has 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.

### CPRE

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 underestimates 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.

### Other Objections

*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 CO<sub>2</sub> 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 CO<sub>2</sub> 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 CO<sub>2</sub> emissions
- construction of the building will produce significant volumes of CO<sub>2</sub> emissions
- the battery manufacturing process will produce significant volumes of CO<sub>2</sub> emissions
- solar supply and replacements required over the lifetime of the development will produce CO<sub>2</sub> 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 alternative 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 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.
- 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.

#### *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

*Miscellaneous:*

- 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.
- 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 et 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 doorway 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.

## **Support**

22 representations in support have been made to Warwick District Council and 2 to Coventry. Where addresses are known, of the 22 representations made to Warwick 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. These raise the following matters: -

- 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.

In addition, two representations have been received making the following comments/observations: -

- 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

## **APPRAISAL**

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

1. Principal of Development
2. Economic growth & employment
3. Green Belt
4. Transport and Highways
5. Environmental Protection
6. Flood risk and drainage
7. Ecology and Trees
8. Impact on neighbour amenity
9. Other matters
10. Developer contributions

### **1. Principle of development**

The Local Plan for Warwick District, at Policy DS16, proposes to allocate land in the vicinity of Coventry Airport for B1, B2 and B8 development. In doing so it has removed land from the Green Belt for the Whitley South and Gateway South developments. In doing so employment and industrial development, including the now operational UK Battery Industrialisation Centre

as part of the Whitley South development has been found suitable for the locality, with the Gigafactory coming under the B2 use that has already been approved on adjacent sites.

It was considered during the approval of the Whitley South development and the Gateway South development by the Secretary of State that the uses proposed would be well suited to the economy of the Coventry and Warwickshire Local Enterprise Partnership area, bringing important economic benefits.

Coventry's Local Plan states that the Council will work positively and proactively with the business community in the city, inward investors, the city's two universities, key public sector employers, the CWLEP and neighbouring local authorities to support sustainable economic growth and job creation.

The Local Plan sets out Coventry's overall levels of growth and the duty to co-operate. Coventry's population is projected to grow by in excess of 89,000 people between 2011 and 2031. This results in objectively assessed need for housing of 42,400 homes over the same period and approximately 215 hectares of employment land. There is also a need for qualitative replacement land which brings the overall requirement to 369 hectares.

Coventry's Local Plan identifies 128 hectares of employment land supply within the city's boundaries. This comprises sites completed since 2011, sites with permission and proposed allocations. The proposed allocations total 101 hectares and include the strategic sites at Whitley, Baginton Fields, Lyons Park, Friargate and Eastern Green. In addition, the city has an agreement with Rugby Borough Council that Ansty Park and Prologis at Ryton contribute 97 hectares to our employment land requirements given their proximity to the city boundary. This totals 225 hectares but means a shortfall of 144 hectares of land for employment purposes remains. This shortfall continues to remain subject to discussions under the Duty to Cooperate between the city and its Warwickshire neighbours. The site measures 125ha, although 35ha of that will be landscaped area providing new public open space, with additional areas of the site laid out for car parking leaving 53ha of employment floorspace.

## **2. Economic Growth and Employment**

The application is supported by an Economic and Social Benefits Report, that assesses the potential economic benefits of the proposed development of a Gigafactory battery production facility on the site of Coventry Airport. A lot of the findings of the report are referenced as part of the justification for building in the Green Belt in the section below and in summary the report describes the urgent need for the UK to develop large scale battery production capacity now and how the growth in demand is set to continue to rise at a sustained pace on the back of the Government's 'net zero' strategy.

The report estimates that 6,000 jobs will be created in the fully operational Gigafactory, with an additional 7,700 indirect jobs supported across the West Midlands, which is a significant economic benefit on top of the investment the project will deliver on the existing road network, the gross value to the region's economy and the 2,500 construction jobs and supply chain opportunities that come from that for local businesses.

The report shows the UK needs to start ramping up production from the current output of 2-3 GWh per annum to 50 GWh pa by 2030 (when the sale of new petrol and diesel cars ceases in the UK) and 140GWh pa by 2040 and that this needs to happen now as it is estimated that facilities capable of large scale EV battery production take 5-7 years from planning to full operational capability.

Due to the significant upscaling of battery production globally, Gigafactories are now firmly established as the dominant manufacturing format in order that manufactures can seek economies of scale as the cost of batteries are the highest cost element of electric vehicles, deliver multiple production lines from the growing range of EVs and for other sectors seeking battery technology, and to ensure competitive sales prices can be maintained as demand rises and to be able to respond to the accelerated transition to EV to which national governments are now committed.

Finally, the location is important for Gigafactories to be close to many large automotive manufacturers, which Coventry Airport is. Access to raw materials / supply chain potential, such as that found throughout the wider West Midlands region through the automotive, advanced manufacturing and engineering businesses will help to deliver materials, processes and technologies a Gigafactory operation will require, a skilled labour force such as the large working age population with experience in manufacturing and engineering found around the West Midlands, proximity to innovation infrastructure such as the UKBIC and working being done at JLR and Coventry and Warwick universities, and excellent transport infrastructure, which Coventry Airport sits next to in terms of being on the strategic road network and close to the national motorway network and rail connections for both the movement of materials and the potential workforce.

### **3. The Green Belt**

The Airport site and therefore much of the application site that is located within Warwick District administrative area is situated within the Green Belt. The part of the site that is located within Coventry, which is the nearby road network to the airport site, is not located within the Green Belt. Both WDC's Local Plan and CCC's Local Plan largely defers to national policy in their approaches to the Green Belt. Policy GB1 of the CCCLP and Policies DS4, DS18 and EC1 of the WDCLP state that development within the Green Belt will not be permitted unless very special circumstances exist and that development proposals shall be assessed in line with national policy.

As a result, the proposal would constitute "inappropriate development" within the Green Belt as defined by the NPPF. Paragraph 147 of the NPPF states that:

*"inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." Paragraph 148 goes on to state that "When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations".*

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. Paragraph 138 of the NPPF states that the Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns from merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

This report will now assess the proposal against each of the above in turn

a) Green Belt Purpose: To check the unrestricted sprawl of large built-up areas

While the proposal would add to the built-up area, the site has very defined boundaries that is contained on three sides by existing development as well as development currently under construction. While the site on its own would be too large to be considered an 'infill development', it has to be considered within this context as it is tightly sandwiched between already significant built-up areas.

The existing urban area of the City of Coventry adjoins the site to the north and east, the existing employment and industrial area of Middlemarch Business Park and the under-construction Gateway South employment development run the full length of the southern boundary of the application site and the recently approved Whitley South employment development adjoins the site to the north-west. The Gateway South and Whitley South development areas were both taken out of the Green Belt by the adopted Warwick District Local Plan, with the Airport site left within it and sandwiched between the two employment areas. On the fourth (west) side of the application site is the hard road boundary of Bubbenhall Road and an allocated housing site that already has approval for 56 new houses.

By virtue of this local context, officers are satisfied that the development would not result in unrestricted sprawl, it would be very much restricted, and would be confined to the urban area by the recently allocated and approved employment and housing sites that extend beyond the northern, southern and western reaches of the application site.

In addition, mitigation will be put in place through the creation of large landscaper buffers around the site, which will separate the proposal from the existing / approved built up areas surrounding it.

b) Green Belt Purpose: To prevent neighbouring towns from merging into one another

The closest settlement to the application site is the village of Baginton, which lies to the north-west of the application site. The proposal would reduce the openness in the vicinity of Baginton, however, it would retain a separation from the village by virtue of a strip of Green Belt lying outside of the application site and which would be increased as a result of the landscape buffer that would be created around the perimeter of the site with a minimum depth of 75m.

In addition, the recently approved Whitley South development could be said to have more of a direct impact on this separation distance due to it being located north-east of Baginton Village directly between Coventry and Baginton. The Whitley South development was found to be acceptable due to the two settlements still being separated by an area of Green Belt and the fact that a substantial landscaped area was proposed adjacent to Baginton Village. As described above this would also be the case with the proposed application, thereby ensuring Baginton Village remains separate.

In terms of larger settlements, the closest town to the development site would be Kenilworth, circa 5km away, however the proposal would not extend beyond the existing and recently approved urban edge created by the Gateway South development and would not impact on any merging between Coventry and Kenilworth.

c) Green Belt Purpose: To assist in safeguarding the countryside from encroachment

The countryside would be safeguarded from encroachment as the proposal will be tightly contained within the site area of the airport, which would not be considered countryside for the purpose of paragraph 138 of the NPPF. The airport is a private, secure, fenced off site on the edge of Coventry and accommodates an array of buildings and aircraft hangers, a 2km runway, taxiways, and hardstanding. While the current site provides a sense of openness within the Green Belt, it is previously developed land and given the tight constraints around the site as described in Green Belt purpose a) above, the proposal would not encroach beyond the site boundary and stay within the existing and recently approved built up area, not extending any further north, south or west than the Whitley South and Gateway South developments.

Furthermore, the impact of the development on the wider countryside would be mitigated by the screening that would be provided by the landscaping areas proposed around the site.

d) Green Belt Purpose: To preserve the setting and special character of historic towns

The area proposed for the Gigafactory does contribute to the setting of Baginton Village, the centre of which around Church Road, Kimberley Road and Coventry Road is a conservation area, where there a number of listed buildings and the scheduled sites of Baginton Castle and the Lunt Roman fort. However, the proposal is considered sufficiently distant and detached from the heritage assets and would result in less than substantial harm. There would also be a substantial landscaped area proposed and an area of Green belt retained adjacent to Baginton, to provide a degree of screening of the proposed buildings and a buffer between the proposed factory and Baginton. The gap between the edge of Baginton and the buildings would be in the region of 130m and to the centre of Baginton would be circa 400m.

Taking into account the proposed landscaped buffer between the development and Baginton and the existing intrusion of the airport, it has been concluded in the heritage assessment submitted with the application that the harm to heritage assets would be less than substantial and towards the bottom end of the scale. This is because the significance of the conservation area is best appreciated from within the historic core of the village, which will not be impacted by the proposed development.

Section 72 of the Planning (Listed buildings and Conservation Areas) Act 1990 requires special attention to be given to the desirability of the preservation or enhancement of the character and appearance of a Conservation Area. The NPPF (paragraph 202) states:

*“where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.”*

The scale of the benefits highlighted below, which include local, regional, and national economic and employment benefits, new public open space being created and improvements to public transport services would outweigh the less than substantial harm to the significance of the designated heritage assets. In addition, and by virtue of how the current airport is used, which is for limited pleasure flights, the creation of 6,000 jobs would be considered securing the site’s optimum viable use. The existing businesses that operate out of the site are acknowledged and appear to be trading and operating well, however, compared to opportunity for job creation from the proposal it could be argued that the existing situation does not optimise the use of this brown field site.

In terms of the character of Coventry, the parts of the Green Belt to the north of the A45 contribute to the setting of Coventry. The proposal would be set behind the existing Stonebridge Trading Estate and the Whitley South employment development. It is therefore concluded that the proposed development in this area would not harm the Green Belt in Coventry.

- e) Green Belt Purpose: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

Given the nature of the Gigafactory and the scale required to ensure it meets global requirements for a cradle-to-cradle operation (manufacture through to recycling), no suitable urban site, derelict or otherwise has been identified. Recognising the shortage of available land, the Coventry Local Plan identifies the need for additional employment land outside of Coventry’s boundary. This is the West Midlands’ Gigafactory and following other sites across the region being considered this was the most suitable in terms of its size, location to transport infrastructure, skilled labour, and other battery development infrastructure. It is also previously developed land, and it means that large parts of undeveloped countryside don’t have to be built over. A Gigafactory is a unique piece of infrastructure that requires a sizable area of land in the right location to ensure it can benefit from economies of scale and serve the EV sector in the most efficient and cost-effective way. It is not therefore considered that the development would harm the Green Belt purpose of assisting urban regeneration.

#### Summary of harm to the Green Belt

In summary, it is considered that the proposals would cause harm to the openness of the Green Belt and to a lesser degree, harm to three of the purposes of the Green Belt listed above. These being urban sprawl, preventing Coventry and Baginton from merging into one another and preserving the setting of Baginton. 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.

The very special circumstances are set out below, but in essence centres around the fact that the proposal would result in socio and economic benefits in the form of 6,000 jobs and even more jobs indirectly linked. The battery production sector is only set to grow and to grow rapidly and immediately with Government policy recognising that immediate investment in the UK battery technology is required for the UK sector to stay competitive and to not lose jobs overseas.

The proposal would also result in new outdoor public green space, habitat, and biodiversity improvements. This would provide significant improvements compared to that provided on the current airport site, which is purposely limited due to safety concerns on airfields, such as bird strikes. The proposal, by its nature, would also contribute to carbon reduction and provide a sustainable form of development. The Environment Statement submitted with the application identifies some benefits from a landscape and visual perspective, but also some limited residual harm from the visual impact of the Scheme. This is not considered to be significant in ES terms.

Supporting economic growth through the planning system is identified as carrying significant weight in the Framework and that can be accorded such weight in this case. Nonetheless, the proposals would still be contrary to the principles of development within the Green Belt and therefore there remains the need to demonstrate very special circumstances.

#### Loss of the airport

In addition to greenbelt loss, the proposal would result in the loss of the Airport. This will result in the loss of pleasure flying, flying training and an air ambulance station. There is no passenger or freight traffic at Coventry Airport as these functions are performed elsewhere locally by larger airports at Birmingham and East Midlands. The application identifies other flying opportunities in the wider area including facilities at Wellesbourne, Wolverhampton, Cranfield, Turweston, Nottingham, Peterborough (Connington), Leicester and Northampton (Sywell).

While Government policy is to retain a certain capacity of airfields around the country, there are no policies or procedures which would prevent the Airport being closed in any event, irrespective of the Proposal. The Environmental Statement (ES) submitted with the application states that there are estimated to be 103 jobs within the Site boundary, and a further 93 within the wider Airport estate but outside the Site boundary. The maximum reported in the ES is the sum of these figures, i.e., the total potential loss of jobs would be 196 jobs.

This is a worst-case scenario and the application states that following a more detailed scrutiny of the businesses affected, some positions would very likely be lost (or at best transferred out of the area) because they are within the Site boundary or very closely related to the operation of Coventry Airport. However, it is also the case that some affected occupiers have no reliance on the operation of the Airport, and the applicant says assistance will be provided to them where needed to find alternative accommodation elsewhere in the area. The applicant

advises that some of the businesses have already confirmed they have arrangements in place to relocate, whilst others still had previously indicated they planned to depart in any event, irrespective of the proposal. The majority of these jobs will be relocated elsewhere, and the applicant has said that a relocation strategy is proposed to facilitate this process.

The applicant's detailed review of the tenants suggests that the actual number of jobs lost is more likely to be around 85 at most. The Council has received objections to the proposal from businesses operating out of the site and to the job losses on the site, which is understandable, especially as some have been on or linked to the site for many years. Planning policy talks about securing the optimal viable use of sites and the opportunity to create 6,000 highly skilled manufacturing and engineering jobs needs to be considered in the round.

In addition, the Scheme will give rise to the loss of some non-designated standing heritage assets (the hangars) and may give rise to the loss of archaeological remains. Mitigation for these impacts is offered through a programme of investigation and recording, but they still weigh against the Scheme in the planning balance.

By virtue of the airport site being wholly within the administrative boundary WDC, they will be evaluating the loss of the airport against Government policy and on airfields and guidance set out in the NPPG as part of their assessment of the proposal.

### **Green Belt Very Special Circumstances**

The reference to very special circumstances (VSC) comes up in paragraph 147 of the NPPF, which seeks to resist inappropriate development that would be harmful to the Green Belt except in "very special circumstances". Paragraph 148 states 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."*

The NPPF identifies that elements of many renewable energy projects will comprise inappropriate development when located in the Green Belt, with paragraph 151 stating that in these circumstances *"very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources."*

Section 14 seeks to meet the challenge of climate change with paragraph 152 stating that *"The planning system should support the transition to a low carbon future..."* *"and support renewable and low carbon energy and associated infrastructure."*

As lead authority, WDC instructed Icen Projects Limited to undertake an independent assessment of need and impact to consider whether very special circumstances exist to support the granting of planning consent, given the site's location within the Green Belt. Icen approached their assessment in a similar way to the applicant in terms of assessing:

- the need for battery production capacity;
- location and size requirements;
- the availability of alternative sites, which might meet the need but with less or no harm to the Green Belt;

- timing, including comparing the time it would take to secure the land for employment development through promotion through the development plan;
- benefits of the scheme including in particular economic and sustainability considerations; and
- impacts of the proposal not coming forward.

### The need for battery production capacity

Both WDC and the applicant's assessments show that there are clear legislative drivers driving demand for battery production, which is led by the climate change emergency and the need to reduce CO2 emissions. The biggest response to this is the move away from vehicles running on fossil fuels towards battery powered electric vehicles, but there will also be other uses and sectors that will gradually increase the demand for battery technology. In the UK the policy announcement that the sale of new petrol and diesel cars will be banned from 2030 means that the need for battery power is expected to keep rising at a high rate. In addition, Icen in their report reference new EU rules on Original Equipment Manufacturers (OEMs) and battery manufacture, assembly and the supply chain, which means battery assembly needs to be taking place in the UK/EU within the next few years if punitive tariffs are to be avoided.

It appears widely endorsed and recognised that the UK will require at least 50 GWh annum capacity by 2030 and 140 GWh annum capacity by 2040 and that several industrial stakeholders consider that this capacity will be required sooner than 2040 given the speed legislation is changing to respond to the pressure of climate change.

To get perspective on the GWh figures required, current capacity in the UK is circa 2-3 GWh per annum. There is therefore a clear quantitative need to bring forward additional battery production capacity and a need for a wide spatial distribution around the country as batteries are heavy and costly to transport. Gigafactories will respond to demand in the market as they are constructed in modular fashion, in increments of around 3GWh pa.

The UK is currently lagging behind the USA and many Asian and European countries in terms of Gigafactory provision, particularly Germany and Scandinavia. Research shows that the UK car industry could be seriously damaged and gradually cease to be a manufacture of vehicles at scale if battery production capacity is not increased. Similarly, if Gigafactory investment were to go to other regions of the UK this would erode the strength of the West Midlands' automotive cluster, particularly that in Coventry and Warwickshire. In an internationally competitive world, failure to develop domestic battery production capacity may lead to OEMs choosing to relocate some, or all, of their production overseas. The House of Lords Science and Technology Select Committee concludes that 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.

Recent announcements indicate that a relatively modestly scaled dedicated facility is to be delivered to serve the Nissan plant at Sunderland. However, other than this proposed application, the only proposed Gigafactory at scale currently subject to a planning application in the UK is at Blyth, about 20 miles to the north of Nissan. This would have only half the capacity of the Coventry Gigafactory and would mean battery production would be

concentrated in the North-East of England and for the UK automotive industry to thrive there needs to be a pipework of Gigafactories around the country.

### Location and Alternative Sites

Iceni, in their report, agree with the applicant's assessment that the Coventry Airport site is a very strong and potentially optimum location at which to locate a Gigafactory given its:

- central location in the country
- proximity to Coventry and Warwick Universities
- proximity to the UK Battery Industrialisation Centre
- proximity to Coventry and Birmingham as major population centres within which there is a supply of labour with relevant transferable skills
- proximity to the strategic road and motorway networks

A site big enough to accommodate the 'cradle to cradle' approach (manufacture to recycling/reuse) will be crucial as forthcoming EU regulations are likely to require this.

The applicant's commercial property agent, JLL, produced a report of alternative sites which identified 61 sites across the East and West Midlands that had potential for this type of development. These were then whittled down to 16 sites that were the subject of detailed scrutiny. Of these 16, some has allocations or had received planning permission for warehousing / logistics uses. Iceni, in their report, agreed that these sites, whilst on paper have land which could accommodate battery production, in reality this would not be realistic and they are likely to be built out for the warehouse uses attached to them, which simply reflects the strength of the B8 warehouse market and land values generated as demand for warehouse space in the UK is at an all-time high.

Other sites identified by the applicant have also been discarded by Iceni as while some are located outside of the Green Belt, the timing of bringing these site forward rules them out with the recognised urgency associated with the need to increase battery production in the UK significantly within this decade to support the automotive industry. In addition, with these sites not being allocated, they have no worked up proposal on them and there is no certainty in regard to the availability of the land to purchase at a competitive value, particularly having regard to the higher potential land values for strategic B8 warehouse uses. There is evidence that B8 warehousing and distribution uses are being sought for these sites with industry experts have warned that the UK could run out of warehouse space within a year following the surge in online shopping and supply chain disruption amid Covid-19. As a result, the development of these sites for a Gigafactory is unlikely to be realistic.

### Timing

As already mentioned in this report, the UK is starting from a very low base in terms of domestic battery production and with the first significant legislation coming into force in 2030, that being the ban on new petrol or diesel cars being sold, the UK only has 8 years to ramp up production to the predicted required level of 50 GWh pa annum by then. A Gigafactory at Coventry Airport could see production start in 2024/5 and reach full capacity within seven years. As a result, this decade for UK battery production capacity and indeed the West

Midlands is crucial, especially when the USA, Asia and European countries have already operational Gigafactories.

The airport site falls within WDC administrative area and as mentioned in the policy section above, the site was not taken out of the Green Belt by WDC adopted Local Plan like the adjoining land to the north and south of it was for employment development. With WDC only at the very early stages of reviewing their Local Plan, with no timescale yet for adoption, officers agree that promoting the site through the emerging local plan process and waiting on an allocation / removal from the Green Belt of the Airport Site would introduce significant delays with economic costs for the West Midlands and the UK.

### Economic Benefits

On the economic benefits, Icen, in their report, summarise these as the follows:

*“We 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.”*

From the research and studies into the battery production sector and from learning how lower a base the UK is starting from in terms of domestic capacity, Officers consider there are many benefits to bringing the site forward for battery production. Many have already been mentioned above in regard to safeguarding jobs in the region and in the wider UK automotive sector and in promoting renewal energy and playing a significant contribution to carbon reduction and the UK’s response to climate change.

Other benefits of the scheme as set out within the application include:

- 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
- An estimated 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, R & D, innovation, and education networks, which together will establish the area as a focal point of international importance for battery technology and its applications
- It will support the delivery of infrastructure for public transport and active travel to the site, which will also create wider benefits in better integrating this area, including surrounding development, with sustainable travel options.
- The Site currently has little ecological value; it is deliberately managed to keep it that way for the safety of aircraft. The Scheme will provide significant enhancements through strategic mitigation and habitat creation with notable benefits for a range of species. There will be clear benefits for ecology and nature conservation.
- Whilst the Site is within the Green Belt it is currently of low environmental value and has no value as a recreation or leisure resource as members of the public are excluded from it. Environmental quality and accessibility within the Green Belt will be significantly enhanced through the Scheme by the introduction of extensive well-designed new multi-functional open green space, much of it publicly accessible, including large concentrations of open space at either end of the Site.
- The Scheme will enable the remediation of the Site. In particular this will create benefits by introducing measures which will reduce the potential for surface water infiltration and hence mobilisation of residual contamination
- The proposed drainage solution offers the opportunity to deliver benefits including reduced, better managed, and higher quality runoff, and the creation of SuDS features to create and diversify habitat in a manner not possible with the Site in its current use.

In conclusion, the proposal will be harmful to the Green Belt by definition, to the openness of the Green Belt and limited impact on the setting of Baginton Village and on urban sprawl, however, this harm is outweighed by the very special circumstances and economic and public benefits of the proposal. Other harm will arise from the loss of the Airport and from some loss and displacement of the existing employment on the site. There will be some residual harm from visual impact. Some non-designated standing heritage assets (the hangers) will be lost and archaeological remains may be lost, although mitigation in the form of investigation and recording can be applied in this respect. Less than substantial harm (at the bottom end of the scale) to the significance of Baginton Conservation Area will arise from the change to its setting. However, the benefits of the proposal are many, varied and significant and the best possible site capable of being brought forward to accommodate a sizable Gigafactory and to the required and urgent timescale. The benefits of the scheme would outweigh the harm to the Green belt and other limited harms identified. Very special circumstances exist and as such the proposal is considered acceptable in the Green Belt.

#### **4. Transport and Highways**

Policy AC1 'Accessible Transport Network' of the Coventry Local Plan states that development proposals which are expected to generate additional trips on the transport network should: a) Integrate with existing transport networks including roads, public transport and walking and cycling routes to promote access by a choice of transport modes. b) Consider the transport and accessibility needs of everyone living, working, or visiting the city. c) Support the delivery of new and improved high-quality local transport networks which are closely

integrated into the built form. d) Actively support the provision and integration of emerging and future intelligent mobility infrastructure.

Policy AC2 of Coventry City Council's Local Plan states that new development proposals which are predicted to have a negative impact on the capacity and/or safety of the highway network should mitigate and manage the network, seek to support and accommodate, where appropriate measures which facilitate enhancements to the wider transport network and be served by routes which are suitable for that purpose.

The Local Highway Authority (Coventry City Council) has reviewed the Environmental Statement, The Transport Assessment, the Travel Demand Management Strategy / Travel Plan, the Infrastructure Delivery Strategy and the Public transport Package submitted by the applicant in support of the Gigafactory proposals and have raised no objections (subject to conditions) on highways and transportation grounds.

### Environmental Statement (ES) Review

Chapter 7 of the ES provides details of the predicted transport related environmental effects of the development. Nationally recognised methodology has been used to develop the significance criteria for the effects and this has been accepted as being appropriate. The transport modelling used to establish the baseline and future scenarios was developed by working groups set up with the applicant and the relevant Highway Authorities (Coventry City, Warwickshire County and National Highways (formerly Highways England)).

The modelling scenarios developed ensured that cumulative effects could be predicted for the agreed future scenarios. The detailed analysis to inform the ES is contained within the Transport Assessment (TA) – in summary, no major adverse effects on personal injury collisions are predicted and major adverse effects on the road network are limited to Rowley Road (in Warwickshire and key to the access strategy). Mitigation is proposed by the applicant to reduce the effects, even where these are not particularly adverse, and these details are set out in the TA.

### Transport Assessment (Ta) Review

The site is located adjacent to the strategic road network and has excellent opportunities to provide access for essential vehicle trips to/from the site via the A45/A46, reducing the need for vehicles, particularly HGVs to pass through residential areas. These routes provide access to/from key locations such as Birmingham, Leicester, and Rugby as well as to destinations further afield via the M6 J2 and the M45 which can be accessed via the A45.

The strategic modelling developed for the baseline scenarios was agreed at a Working Group established by the applicant and the Highway Authorities. Coventry's own model (CASM) was used in conjunction with Warwickshire's *Paramics* model (KSWA – Kenilworth & Stoneleigh Wide Area).

Coventry engaged its own consultants (WSP) to join the working groups and to oversee the technical input. At all times, the modelling working group has been collaborative to ensure a robust evidence base for the transport impact of the development.

The wider TA was also scoped with all Highway Authorities (LHAs) and in general, does provide a robust analysis to enable recommendations on the suitability of the development to be made. Outputs from the *Paramics* modelling show the areas where consideration should be given to mitigation:

- The A45 corridor between Sir Henry Parkes Road and Stivichall roundabout (St Martins Road); and
- Gibbet Hill Road/Stoneleigh Road corridor between Kirby Corner Road and B4115

These corridors exhibit some congestion as a result of the development and as such are the most appropriate places where the mitigation would benefit for the communities in and around the south of Coventry.

Along the A45 in Coventry, in a southbound direction, traffic exits the Tile Hill gyratory and, in a westbound direction, exits Stivichall Interchange (Festival Island), both of which have greater capacity.

In between these locations, more constrained junctions are encountered including the Sir Henry Parkes Road roundabout, A429 Kenilworth Road junction and the Stivichall Roundabout (St Martins Road). Providing greater control of traffic would allow vehicles to flow more freely with potential reductions and better management of queues and delays. The improvements are likely to be a combination of a potential new Average Speed Enforcement (ASE) zone and new technology being employed at the aforementioned junctions are being actively investigated by the applicant's transport consultants and Coventry City Council.

It is proposed to provide significant improvements to sustainable travel links either by facilities provided directly by the developer or through financial contributions to wider improvements. It is likely that these improvements would provide wider benefits to the surrounding areas with the potential to remove background trips from the A45 and Gibbet Hill Road/Stoneleigh Road corridors. The Gibbet Hill Road corridor proposals are discussed below, in the Development Impact Mitigation section.

With the application being outline with parking (amongst many other thing) reserved, no details have been provided other than a general statement that applying the B2 use standards in the Coventry Local Plan would be too onerous. Whilst there is merit in this statement, it is considered important to set out a methodology now for consideration at the outline stage, such that decisions can be made or controls put in place that reflect any concerns of under-provision and its potential to impact adjacent residential amenity. A condition will be attached requiring this.

#### Travel Demand Management Strategy & Travel Plan (TP)

The Travel Plan (TP) contains a vision for a sustainable development and as such, where appropriate, sustainable measures will be given considerable weight. The TP recognises that if an 81% mode share for car driver trips continues, the classic predict and provide methodology for new highway infrastructure is not desirable. The target is 65% for single occupancy vehicles. Given that there is another 8% of the workplace population in the

Warwick 005 MSOA who responded to the 2011 census as being car passengers the overall numbers of targetable employees, being somewhere between 81% and 89% in cars, should be readily reduceable via the proposed interventions in the TP and other strategies.

The strengths, weaknesses, opportunities, and threats analysis undertaken in relation to the travel demand aspect of the planning proposal identifies some positive examples of existing sustainable transport facilities such as dedicated cycle routes to the north and west of the site, towards the city centre and surrounding residential areas. The existence of cycling facilities along the A45 (now severed by the LILO slip roads at Whitley South) and over the new bridge, plus an improved footway along the north side of Rowley Road are factors in determining this positive position, however routes to Coventry city centre are not up to the standards required to promote the levels of walking and cycling needed to achieve the modal shift targets.

The Infrastructure Delivery Strategy has positively addressed this issue with some excellent suggestions, which will be reviewed below.

#### Public Transport Package (Technical Note Version 1 dated 2 December 2021)

It is suggested that contributions are collected via s106 payments for the delivery of public transport services to mitigate the planning impact of bringing forward the Gigafactory Highways Officers are exploring options to pool funding from the other developments recently approved adjacent to the site (Whitley South and Gateway South) and also to take advantage of the increased numbers that all developments will add in terms of passengers.

The Whitley South development legal agreement under section 106, sought to:

- Establish a new bus route to serve the Whitley employment zone and the airport area;
- Include bus priority measures through the A444 Whitley Interchange and the JLR link road;
- Provide new real-time equipped bus shelters; and
- Promote the route as the “primary surface transport option to the development”
- A strategy to extend the service 21 and provide a half-hourly frequency for the service “on a commercially viable basis”.

All of this was to be paid prior to the first occupation of the Whitley South development and the cost was also capped at £900,000 but none of this sum was to be used to extend service 21.

The Gateway South development legal agreement under section 106 provides a sum to Warwickshire County Council for a *Public Transport Contribution* of £800,000 (Index Linked) to be paid to the County Council prior to occupation towards the provision of a public transport service between the Application Site and Coventry City Centre.

As can be seen there is extensive potential funding in place to allow a pooling of contributions from three developments to enable a significant improvement in bus service provision to serve the sites and encourage sustainable travel to and from Coventry.

It is understood that from September 2019 the Middlemarch business park site has already

contributed towards service 21A arriving from Coventry. The service arrives at Middlemarch business park at 0547, 0647, 0717, 0743, 0811 and 0847, returning at 1410, 1610, 1640, 1710, 1740 and 1810. The Council would like to see this weaved into future provision.

The proposed Gigafactory funded bus network includes a fast service to Coventry City Centre as a cross-city link to Bedworth, tailored services to Warwickshire towns and villages and finally tailored worker services serving the west and east sides of Coventry.

The Travel Plan for Jaguar Land Rover's Whitley site includes a staff shuttle bus from Coventry Railway Station. Something similar – or an adjunct to this JLR provision – will undoubtedly be required for the Gigafactory.

The formal position of Coventry City Council in response to this strategy is supportive. A flexible approach is necessary to ensure that once the location of significant numbers of employees is known, the look of the network may be different to that proposed by the applicant, therefore it is sensible not to be overly prescriptive at this stage but rather to agree the quantum of financial contributions so that between the developer, TfWM, Warwickshire County Council and Coventry City Council, the most appropriate bus network can be put in place to serve not only the Gigafactory but also Whitley South and Gateway South/Middlemarch.

#### Summary of public transport contributions and incentives required by TfWM and Coventry City Council:

- The city centre (on onward to Nuneaton & Bedworth) service requires funding of £900,000
- All buses in Coventry must be electric
- The worker service(s) require funding of £300,000 – these will be:
  - Services provided directly by the developer; or
  - An extension or re-routing of existing services across the south of the city; or
  - A modification of existing Demand Responsive Transport networks
- Travel Plan incentives must include a package which includes free bus travel for workers. These incentives are separate from Mobility Credits and should form part of the contract of employment for workers

#### **Car Sharing**

Car sharing is an extremely effective way in reducing single occupancy car travel for employees. A 20% switch from single to multiple occupancy vehicles will achieve at least a 10% reduction in car drivers so is an incentive which must be heavily promoted as part of the recruitment process.

#### **Parking**

Not only should the car sharers' parking be conveniently located, but their non-sharer colleagues should be kept up to date with new incentives and advice to change their way of looking at the issue. For the benefit of emissions, the parking could be ranked as follows in terms of distance from the factory entrances:

1. Cyclists
2. Mass Transit Hub (ULEV Buses)

3. ULEV Car Sharers & Disabled Drivers
4. Car Sharers
5. ULEV Taxi Dropoff
6. ULEV Car Drivers
7. ICE Taxi Dropoff
8. ICE Car Drivers
9. ICE SUV Drivers

The indicative targets described by the applicant are agreed with the Council's Highway officers as good suggestions. They will be finetuned over the time the development comes forward in its various phases and the baseline data will be used to outline the ultimate mode splits required. There is every chance that the Warwick 005 MSOA has a much higher car driver percentage than the Wards nearer to the site in Coventry. The reductions required will be agreed between Coventry City Council and the Gigafactory operator in line with the requirements of the TP, supported by the on-site arrangements and the off-site improvements to infrastructure and services outlined elsewhere in the application.

The provision of a new segregated two-way cycle track along the southern side of Rowley Road between Tollbar End and Baginton is welcomed as a far better facility than the stop-start version on the north side. It will provide dedicated access into the Gigafactory as well as connections to London Road (via Tollbar End) and routes to the west and south. An improvement to the cycle track on the northern side of Rowley Road between proposed Access 1 and Tollbar End has also been submitted in response to representations from Coventry City Council to ensure that all cycling infrastructure complies with Local Transport Note 1/20 – Cycle Infrastructure Design. This introduces a safety margin between the cycle track and the carriageway.

Other corridor connections proposed have been updated via the more recently submitted Infrastructure Delivery Strategy (IDS) which is reviewed below.

#### West Midlands Cycle Hire Scheme

The West Midlands Cycle Hire scheme was launched in 2021 and in response to the IDS, Coventry City Council has suggested a list of new locations for bike stations within 8km of the Gigafactory (see below for the list).

The gravity model presented in Appendix D of the TA suggests that 49% of Gigafactory employees will come from Coventry.

Cycling needs to be pushed by incentivising the use of bikes to and from the development. The cycle parking on site is welcomed and the Council would like to see the developer help attract new cyclists who could take advantage of bike hire if it was more widely available in the areas where they live. There is no point having stations in place at the Gigafactory if there are none where people live.

Installing bike hire stations within an 8km radius of the Gigafactory would give real impetus to those who may not wish to purchase a bike, have security concerns, or simply don't have space at home to store a bike.

Using the applicant's 8km buffer it is clear that areas already covered by the scheme, such as the City Centre and the University of Warwick, would not be the priority locations for additional stations funded by the applicant. Rather, areas in the south of the City would be the logical choice. Public land availability will obviously be the key constraint here, but a bike hire station should be installed in each distinct area with sufficient capacity to hold the number of bikes needed to effect real modal shift.

It is suggested that the following residential centres in Coventry will require hire stations:

- Earlsdon
- Canley
- Finham
- Stivichall
- Cheylesmore
- Whitley
- Willenhall
- Binley / New Century Park
- Stoke Aldemoor
- Stoke
- Lower Stoke (Former PSA Works)

Initially a 12-bike station with 6 e-Bikes would be required at each centre. These locations coupled with the suggested improvements to cycle infrastructure would provide a real opportunity for the Gigafactory development to reach the >10% cycling mode share target.

As part of the travel plan incentives, a pump primer of credit for employees to use the hire bikes would help get things started and hopefully form a long-term sustainable travel habit amongst the staff. Such a primer has been outlined in the MaaS section. Extra capacity can be built into the proposals by future-proofing the locations so additional spaces can be easily added.

Since the above list was written the applicant has suggested that stations are located in Ryton and Baginton too. These are welcome additions but appear to have been included at the expense of Earlsdon and Canley. Further discussions as part of the s.106 negotiations are required to resolve this issue.

Each hire station requires a contribution of £49,050.00 plus the cost of any civils and power provision.

### Mobility as a Service (MaaS)

The provision of financial incentives to employees is known to improve their appreciation and uptake of sustainable transport. Mobility Credits, already being piloted in Coventry and proposed for the sustainable urban extensions at Eastern Green and Keresley will be a key tool to make a real difference in travel habits.

The submitted Infrastructure Delivery Strategy (IDS) at page 13 proposes a value of £25 per employee for use in the first 6 months. This sum is not considered to be a sufficient sum to make a difference. The Council would be looking to see each employee offered £150 for use via the “One App” or “Swift Card” focussing particularly on bus usage and the WM Cycle Hire scheme. Monthly bus passes or minutes bundles will be promoted as the most cost-effective use of the sums payable.

The Cycle to Work Scheme for employees, coupled with the physical enhancements on and off site will be a crucial tool in driving increased cycling numbers and reducing car journeys, and is supported wholeheartedly by the city council.

The EV charger provision of 25% equipped for use is supported. The car parking management strategy and on-site arrangements should be designed to clearly inform employees of the importance of sustainable travel followed by vehicle choice if cars are the only option.

#### On Site Infrastructure – Mobility Hubs

The provision of prominent mobility hubs containing bike share, hire and parking, a bus interchange, car sharing spaces, EV charging for visitor as well as staff and a drop off / collection point for parcels is welcomed.

Reference is also made to high quality bus shelters. These are essential but for something as large as a Gigafactory it would not be out of place to have a café for employees to use as they arrive for work, or before they leave for home. For such a prestigious site, global restaurant brands would be keen to associate themselves with sustainability. A comfortable place to sit whilst waiting for transport to arrive would enhance the experience for employees and possibly persuade more of them to change away from car driving for the daily commute. It seems sensible to combine the mobility hubs with the enhanced bus shelters and comfortable waiting facilities. Clearly, as the pandemic has shown, working remotely has been popular with many employees. Those not involved in the manufacturing process should be encouraged to take up remote working as part of the TP.

For monitoring, Coventry City Council will provide support for the site’s TP coordinator. Pro-active engagement with the Gigafactory will be part of this service. The TP Monitoring Fee is £6,800 per year for the first 10 years, although this could be extended if the site requires more intensive input beyond the initial period.

#### Infrastructure Delivery Strategy

The applicant’s highway consultant Phil Jones Associates has submitted a comprehensive document detailing what measures and financial contributions are being proposed to address the impacts of the development.

As part of the Infrastructure Delivery Strategy, improved cycling provision along Rowley Road is proposed. Following discussions with the applicant the route from Tollbar End is now much more direct and avoids unnecessary road crossings by bringing cyclists further west on the northern side of Rowley Road until they can safely cross the road near the easternmost

access.

Following discussions with the applicant a number of corridors have been included for walking and cycle enhancement as follows:

### **Leaf Lane (Proposed initially)**

Coventry City Council has recently carried out a traffic calming scheme on Leaf Lane as part of the off-site mitigation package agreed for the Whitley South development. As such any proposals to make amendments as part of this application are no longer required.

### **Connections to Kings Hill Development / Finham / Howes Lane Corridor**

Several improvements for cyclists between Mill Hill, Baginton and Kings Hill are proposed within the residential area along and to the west of Howes Lane. The signalisation of the junction of St Martins Road and Droylsdon Park Road is, in principle acceptable, as it will create a safe crossing for the desire line promoted via the use of Brentwood Avenue and Cotswold Drive.

Minor traffic calming works on Brentwood Avenue and Cotswold Drive will be required to help reduce speeds in the vicinity of the alleyway connecting the 2 roads. Works to the greenspace near Finham Library to allow access across the space and towards Green Lane are in line with requirements to make the route continuous. The only sections in need of further investigation are the section on Howes Lane in terms of speed reduction and the junction treatment with Brentwood Avenue / Winsham Walk. The consultant is working on this aspect and it is hoped that a revised proposal is offered prior to determination. However, the principle of the proposed works is acceptable.

Although there is merit in providing a route through the residential area, and it will certainly benefit those living along these roads, the fact remains that the most direct route into the Kings Hill development is along Howes Lane. At its junction with Green Lane, there will be access into the development therefore a scheme to introduce cycle facilities along Howes Lane must be investigated. Once riders are off Mill Hill in Baginton, the remainder of the route along Howes Lane, the Council would like to see made cycle friendly. This is not to diminish the route west of Howes Lane but it does offer a more direct and therefore faster option. A total of £480,000 has been suggested as a contribution for the submitted works in the Obligations table on page 16 of the IDS, although the consultant has suggested that this would be paid to Warwickshire County Council when in fact the locations are all within the City administrative boundary. The sum will be re-checked when the highway works have been refined based on feedback provided to the consultant and will be reported as a late item.

### **London Road Corridor**

Coventry City Council is in the process of designing improvements along the London Road corridor, north of the St James Lane junction. The first of these is a new signalised junction at Abbey Road which will not only improve this junction in terms of non-motorised user accessibility but also provide a new vehicular access to the recently approved Whitley Pumping Station residential scheme. A further significant scheme is to improve priority for buses, pedestrians, and cyclists at the Abbey Park roundabout (ASDA).

There is an existing cycle facility between Chace Avenue and Abbey Road but south of Chace Avenue the situation is far from ideal. If the London Road Corridor is one of the preferred cycling routes between the Gigafactory, large residential areas and the City Centre, then the section from Tollbar End to Chace Avenue is in need of significant improvement to a standard compliant with Local Transport Note 1/20 (Cycle Infrastructure Design), likely to be a 2-way 4m wide cycle track on the south western side of London Road.

The applicant is proposing to contribute to a Cycle Superhighway between Tollbar End and Abbey Road, on a proportionate basis. Coventry City Council requires that the entire scheme is funded via the Gigafactory application. All other cycling contributions secured from other developments do not cover this area and are already committed. No development has generated as many trips as those proposed by the Gigafactory and certainly none has been ambitious about prioritising pedestrian and cycling along London Road which, coupled with the City Council's ambitions to make other routes the priority for through traffic, mean that London Road can be made into the primary cycling route into Coventry from a south easterly direction.

Therefore, instead of offering 36% of the cost of the works, the Council would like to see the applicant contribute a significantly proportion of the total scheme which has been costed at approximately £1.85M including utilities diversions

#### **St James Lane Corridor to Willenhall / Binley**

Coventry City Council and the applicant's consultants have carried out investigations to provide a suitable connection along or near to St James Lane with the ultimate aim of serving the Willenhall area and reaching the Binley Cycleway. The applicant has agreed in principle to provide a financial contribution to a cycling scheme to deal with this area of £200,000.

#### **Stivichall Interchange (Festival Island) – Drawing 05232-TR-C-03-05-01**

The proposals at this junction need to tie in with improvements underway via National Highways. The route proposed appears to be a sensible one to allow access to/from Mill Hill and Leaf Lane.

#### Development Impact Mitigation

##### **A. Gibbet Hill Road / Stoneleigh Road**

The Gibbet Hill / Stoneleigh Road corridor, essentially between Kirby Corner and Kings Hill Lane has been identified as an area of concern in terms of the predicted traffic movements within the TA. Rather than make it more attractive to drivers to use by making capacity improvements (difficult given the physical constraints) it is likely that it will benefit from a scheme of traffic calming, continuing the principles of the successful public realm works at the University of Warwick for a greater length than at present.

The section nearer to Kenilworth Road, beyond the Universities Gibbet Hill Campus, whilst more rural in nature needs to be enhanced for cycling which may involve the use of University land to achieve an off-road link.

East of Kenilworth Road there is around 680m of Stoneleigh Road within the City boundary.

The approved Kings Hill development is due to contribute up to a third of the £750,000 secured via a s106 payment to improve cycling along this corridor. It is suggested that the Gigafactory applicant contributes a significant sum not only to mitigate the impacts of the development on this corridor but also to provide improvements such as a priority arrangement on the railway bridge, lengths of footway / cycle track on Stoneleigh Road plus the works on Gibbet Hill Road.

The consultants have provided an assessment by email (22/11/21) showing that with a cycle time of 90 seconds with 10 second intergreen periods, a set of signals at the railway bridge on Stoneleigh Road would have capacity to accommodate peak hour traffic without undue delay. This safety improvement will be a welcome enhancement to cycling via Kings Hill to and from the Gigafactory site.

### **B. A45 Canley Gyratory to Festival Island**

The A45 corridor issues have been discussed earlier within the modelling section above. Coventry City Council therefore suggests that the sum offered in the IDS being a proportion of £1,300,000.00 should be divided so as to deliver improvements to traffic flow on the A45 and for the wider/alternative scheme of the Gibbet Hill corridor. The actual quantum will be discussed and agreed as part of ongoing s.106 discussions.

#### Access Proposals (Within Coventry Area)

An access is being proposed into land to the west of the Tollbar roundabout. The details of this are not required at this stage but cyclist and pedestrian priority must be emphasised across the entrance.

#### Summary of Potential S106 Requirements (CCC) – the exact sums are yet to be agreed

- A45 Corridor Traffic Flow Improvements
- Gibbet Hill / Stoneleigh Road Corridor
- Mobility Credits
- W&C Howes Lane / to Finham
- London Road Active Travel Corridor
- St James' Lane to Willenhall / Binley
- West Midlands Cycle Hire scheme
- Bus Service Enhancements
- Bus Priority at A444/London Rd
- Travel Plan Monitoring

In conclusion, the TA concludes that the scheme proposes a significant programme of transport and highway interventions, which are acceptable to the Council's Highway Department in order to mitigate the impact from the development and make it acceptable on Highway safety grounds. Subject to agreement of the above S.106 contributions, conditions in relation to the details of the cycle track on the north and south sides of Rowley Road and details of "Access 1" off Rowley Road and agreement on the following details:

- the A45 mitigation scheme

- the Gibbet Hill Road / Stoneleigh Rd mitigation scheme / Active Travel proposals
- Potential amendments to the Howes Lane / Finham works
- Confirmation as to the scope and detail of the St James Lane area works
- Discussions on the WM Cycle Hire scheme locations
- the facilities at the mobility hubs / bus shelters on site
- Finalisation of the section 106 agreement, scope, and financial details

### Strategic Road Network

The A45 and A46 are part of the Strategic Road Network (SRN) and are not under the control of the city council but looked after by National Highways. National Highways are satisfied that the further transport modelling assessment and analysis carried out during the course of the assessment of the application concludes that the development proposals and required mitigation are acceptable.

As a result, National Highways planning response do not raise objection to the proposal and are satisfied that the impact of the development proposals can be accommodate on the SRN with the implementation of a Sustainable Transport Strategy and Travel Plan for the development site, alongside contributions towards sustainable transport infrastructure in the form of cycle infrastructure upgrades at the A45/A46/A444 Stivichall Junction and on the A45 Corridor to the south the A45/A46 Toll Bar End Junction.

For the A45/A46/A444 Stivichall Junction National Highways will be seeking a contribution (£230,000.00) 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. For the A45/A46 Toll Bar End Junction National Highways will request a contribution of £400,000.00. This will provide connectivity to communities along this corridor with the employment site and cycle facilities at the A45/A46 Toll Bar End Junction.

National Highways also request conditions be attached to any planning permission requiring submission of a CEMP and a site wide travel plan and control over the times traffic during the construction phase can use the SRN (essentially outside of peak rush hour times Monday to Friday).

## **5. Environmental Protection**

The Environmental Protection Officer has reviewed the submitted reports and considered matters of noise, air quality and contamination. Neighbours have raised concerns in respect of a number of environmental matters and their concerns that the proposals will have on their amenity. As the development site is in Warwick District Council's administrative boundary, most of these matters will be for their authority to manage. However, there are matters which will need to be considered more fully at the reserved matters stage and matters such as air quality are being considered alongside the transport proposals. Overall, the Environmental Protection Officer has no objection subject to further consideration of air quality and subject to conditions.

### Noise

As this application is in outline, the operational phase assessment relies on a set of unconfirmed assumptions, particularly the building fabric, internal noise levels, vehicle movement and external plant requirements. The application is speculative, and an occupier and the particular manufacturing processes and plant requirements are still to be confirmed. A revised noise assessment will therefore be required at the reserved matters stage when the detailed design is known, and this will need to include any mitigation measures required.

#### Odour

Subject to confirmation of the specific manufacturing processes further details on any potentially odorous processes may be required accompanied by an odour assessment. Similarly details of any odorous waste and management procedures would be required.

#### Air Quality

Policy EM7 states that major development schemes should promote a shift to the use of sustainable low emission transport to minimise the impact of vehicle emissions on air quality.

The application site is located within an Air Quality Management Area (AQA) declared for NOx. In line with the NPPF paragraph 186, the Air Quality SPD and with Chapter 11 (on air quality) as well as policies H3, DS3 and EM2 of the Coventry Local Plan the air quality impact of the development needs to be mitigated.

Again, as this application is in outline, there are a number of unknown factors that make it difficult for Environmental Protection to provide detailed comments. Environmental Protection requested clarification that Highways accept the traffic data supporting the air quality assessment before they provide further comments. Highways have now confirmed that the traffic data is accepted and further comments from Environmental Protection are awaited. These will be provided within the late representations document.

Any point source emissions, for example, from flues/vents serving combustion processes or extraction from manufacturing will need including in the assessment when known at the reserved matters stage when the manufacturing processes are confirmed. A Construction and Environmental Management Plan will also be required for the construction period. As the site lies within Warwick District Council any relevant environment permits will need to be applied for and any conditions relating to emissions limits imposed by the regulators which will either be Warwick District Council or the Environment Agency will need to be complied with.

Full details of the air quality mitigation measures will be required in line with the Air Quality SPD. Further updates on this will be reported within the late representations.

#### Contamination

Policy EM6 seeks to ensure that redevelopment of previously developed land does not have a negative impact on water quality, either directly through pollution of surface or ground water or indirectly through the treatment of wastewater by whatever means.

Environmental Protection agree with the findings of the submitted reports – that intrusive site investigation is warranted and anticipate that this will be done on a phased basis.

Accordingly, a phasing plan will be required detailing site characteristics and a remediation strategy. The standard ground contamination conditions are recommended.

The Council's records do not extend beyond the City boundary but given the site history as a WW2 fighter airfield and anecdotal records (the site was bombed in the blitz), it is recommended that an unexploded ordnance survey be carried out in accordance with CIRIA report C681 prior to any intrusive investigation.

## **6. Flood Risk and Drainage**

Policy EM4 states that all major developments must be assessed in respect of the level of flood risk from all sources. If development in areas at risk of flooding is the only option following the application of the sequential test, it will only be permitted where the criteria set out in Policy EM4 are met.

The application is located within Flood Zone 1 and as such there is no risk of flooding. The Lead Local Flood Authority are satisfied with the information contained within the submitted drainage strategy and drawings, and ground investigation report and raises no objections subject to the development being carried out in accordance with the submitted information. This will be secured through a condition.

## **7. Ecology and Trees**

Policy GE3 of the Local Plan states that Sites of Special Scientific Interest (SSSIs), Local Nature Reserves (LNRs), Ancient Woodlands, Local Wildlife and Geological Sites will be protected and enhanced.

Policy GE3 establishes that developments should provide a net gain and where this is not possible provide some form of off-setting. Policy GE4 states that trees make a valuable contribution to the city's green landscape. New developments should seek to retain existing trees and other landscape features, incorporating them into a high-quality design and landscape proposals where possible. Should loss be unavoidable, compensatory provision of new trees should be proposed as part of a well-designed landscape scheme.

Warwickshire Wildlife Trust have indicated that the "openness", connectivity, biodiversity, noise, light, and air pollution will be adversely affected by this major proposal without significant and meaningful compensatory measures.

The Council's Ecology Officer has considered the proposals where they relate to works within the Council's administrative boundary and indicates that the development would not have any direct impact on any statutory or non-statutory wildlife sites. There are no records of notable wildlife from the site but there are records of bat and hedgehog from the local area. Within Coventry, the area affected is small, approximately 2 hectares adjacent to the Tollbar Roundabout.

The application is accompanied by an Environmental Statement which states that a full ecology survey of the site has been undertaken. This concludes that the potential impact of the development is restricted to loss of habitat, birds, and foraging/commuting bats. The

submitted plans suggest that the area within Coventry will form part of the wider green infrastructure network and will be managed as wildflower grassland with scattered scrub. Since the plans show there will be no impact on the area within Coventry which is retained as wildflower grassland there is no objection on ecology grounds, subject to a condition regarding the landscaping. Considerations of the wider site outside Coventry will be a matter for Warwickshire County Council Ecology. A biodiversity Impact Assessment should be provided for the overall scheme, though there is no requirement for this regarding the section inside Coventry.

## **8. Impact on existing residential amenity**

Paragraph 130 of the NPPF seeks to protect the amenities of all existing and future occupants of land and buildings. Policy H5 and the Residential Design Guide SPD requires new development to be designed and positioned so it does not adversely affect the amenities of the occupiers of neighbouring properties.

The development within CCC administrative boundary is around the highway network and following consultation with the Council's Highway and Environmental Protection Officers there is not considered to be any adverse impacts on the amenity of neighbouring properties both within CCC and WDC subject to the mitigation measures listed above and the contributions secured in the S106 listed below to make improvements to the road infrastructure and the creation of new cycle Lanes into Coventry City Centre and around junctions of the A45.

## **9. Other Matters**

West Midlands Fire Service have no objection subject to a condition for compliance with Approved Document B, Volume 2, Buildings other than Dwellings, 2019, including Requirement B5: Access and facilities for the fire service and Section 15: Vehicle access. The document covers all standards related to fire safety precautions to ensure the safety of occupants, firefighters and those close to the building in the event of a fire, including means of escape, the ability to internally isolate a blaze to prevent a fire from spreading, external fire spread, firefighter access to the building and facilities, fire detection and warning systems in place within a building. It also addresses the internal spread of a fire due to the structure or lining used within a building and safety measures related to this.

The Sustainability Officer has no objection to the proposal and notes that a Sustainability statement and impact assessment has been provided, as well as an Environmental Statement and a Sustainability report, all of which goes above and beyond the basic requirements. They further note that the development in and of itself will be providing renewable energy support through its battery production processes. It is also commendable to note that the design of the facility is also incorporating positive sustainability actions such as solar PV, thermal fabric efficiency, natural daylight maximisation, is considering the potential for heat pumps and/or wind power and is also aiming for the BREEAM Excellent standard.

The Economic Development Service has no objection to the proposals subject to a condition for local employment.

Cadent have provided details of their assets in the vicinity and standing advice for safe working in the vicinity of those assets.

## 10. Developer Contributions

Policy IM1 'Developer Contributions for Infrastructure' states that development will be expected to provide or contribute towards provision of: a) Measures to directly mitigate its impact and make it acceptable in planning terms; and b) Physical, social and green infrastructure to support the needs associated with the development.

The development would trigger the need for the following contributions to be secured under a Section 106 Legal Agreement. The heads of terms are as follows:

Planning obligation	Head of Terms
<b>Transport and Highway Measures</b>	
<b>Travel Plan</b>	<p>Preparation and implementation of a Full Travel Plan in line with the Travel Demand Management Strategy and Travel Plan to include appointment of a Travel Plan Co-ordinator and agreed monitoring measures.</p> <p>Financial contribution for Travel Plan Liaison £35,000 (WDC administrative area)</p> <p>Financial contribution for Travel Plan Liaison £68,000 (CCC administrative area)</p>
<b>Mobility as a Service</b>	<p>Financial Contribution for the purchase of mobility credits to a total value of £315,000 (CCC administrative area)</p>
<b>Active Travel</b>	<p>Financial contribution towards the delivery of active travel improvements to the Baginton gateway at Rowley Road £410,000 (WCC)</p> <p>Financial contribution towards the delivery of active travel improvements to the south of the site towards Stoneleigh and Bubbenhall villages £250,000 (WCC).</p> <p>Financial contribution towards the delivery of active travel improvements along Howes Lane and connections to Kings Hill £480,000 (CCC).</p> <p>Financial contribution towards the delivery of active travel improvements at Stivichall Interchange £320,000 (National Highways).</p> <p>Financial contribution towards the delivery of active travel improvements towards Ryton on Dunsmore £400,000 (National Highways).</p> <p>Financial contribution for the delivery of an e-bike hire scheme £540,000 (CCC).</p>
<b>Public Transport</b>	<p>Financial contribution towards the delivery of bus services to serve Warwickshire, of £300,000 (WCC). The enhancements to be delivered to provide transport for employees at shift change times.</p>

Planning obligation	Head of Terms
	<p>Financial contribution towards the enhancement of the bus route 21A, of £900,000 (CCC for the benefit of TfWM). The enhancements to be delivered to provide transport for employees at shift change times.</p> <p>Financial contribution towards the provision of local bus services to key communities on the eastern and western sides of Coventry to cater for local demand, of £300,000 (CCC for the benefit of TfWM). The enhancements to be delivered to provide transport for employees at shift change times</p> <p>Financial contribution towards a study to determine appropriate public transport priority measures between the Whitley Interchange and the site £80,000 (CCC)</p>
<p><b>Traffic Management and Off-Site Highway Mitigation</b></p>	<p>Financial contribution towards the delivery of a traffic management scheme through Baginton village which will be determined in consultation with the local community, of up to £1,250,000 (WCC)</p> <p>Financial contribution towards offsite highways, traffic management and/or active travel measures (in lieu of highways measures) in the South West Coventry, North Kenilworth, and London Road areas, of up to £2,100,000 (CCC/WCC).</p> <p>A traffic monitoring scheme to be agreed to define actual impacts and potential mitigation strategy in South West Coventry and North Kenilworth in accordance with [ ] (to be defined).</p>
<p><b>Ecology</b></p>	
<p>Biodiversity Net Gain</p>	<p>Either (or a combination of):</p> <p>Preparation and implementation of a Biodiversity Off-setting Scheme to include habitat creation and enhancement on site or in suitable off-site locations to deliver the biodiversity gain agreed by WCC; or</p> <p>Financial contribution of up to £2,400,000 to allow WCC to secure habitat creation and enhancement measures in the vicinity of the Development to deliver the agreed biodiversity gain (less any biodiversity gain delivered through a Biodiversity Off-setting Scheme).</p>
<p>Skylark Contribution</p>	<p>Either (or a combination of):</p> <p>Preparation and implementation of a Skylark Habitat Mitigation Scheme to include skylark habitat creation and enhancement on site or in suitable off-site locations to mitigate the loss of skylark habitat as agreed by WCC; or</p> <p>Financial contribution of up to £600,000 to allow WCC to secure skylark habitat creation and enhancement measures in the vicinity of the Development to mitigate the loss of skylark habitat (less any mitigation delivered through a Skylark Habitat Mitigation Scheme).</p>

<b>Planning obligation</b>	<b>Head of Terms</b>
<b>On-site open space</b>	
<b>Provision of on-site open space</b>	Provision of 2.5 hectares of on-site open space per 1000 (full-time equivalent) employees, to a maximum of 15 hectares for the projected maximum 6000 employees.
<b>On-site Open Space Design, Management and Maintenance Strategy</b>	Preparation and implementation of an On-site Open Space Design, Management and Maintenance Strategy detailing phased provision linked to employee numbers, composition (indicative split 40% parks and gardens, 40% urban woodland, 20% amenity green space), landscaping, management, and maintenance arrangements. Maintenance arrangements may include options for transfer of all or part of the on-site open space to WDC with a commuted sum for maintenance.
<b>Employment &amp; Training</b>	
Employment and Training Strategy	Preparation and implementation of an Employment and Training Strategy to link local people and businesses with employment, training and contract opportunities arising from the Development during construction and operation.
<b>Facility use</b>	
Occupier approval	To ensure that the facility is only used for the production and recycling of batteries and related low emission power technologies falling within class B2 and activities ancillary thereto, WDC to approve the first occupier as being an appropriate commercial entity active in the relevant industrial sector with capabilities to deliver the proposed Gigafactory outputs.
<b>Low Emissions / Air Quality</b>	
Low Emissions Strategy	Preparation and Implementation of a Low Emissions Strategy to include air quality mitigation measures (construction and operation) to a value of £433,386.74.
<b>Monitoring</b>	
Monitoring fees	WDC monitoring fee – to be defined  WCC monitoring fee of £10,000

## **EQUALITY IMPLICATIONS**

Section 149 of the Equality Act 2010 created the public sector equality duty. Section 149 states:-

- (1) A public authority must, in the exercise of its functions, have due regard to the need to:
- a) eliminate discrimination, harassment, victimisation and any other conduct that is prohibited by or under this Act;
  - a) advance equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
  - b) foster good relations between persons who share a relevant protected characteristic and persons who do not share it.

Officers have taken this into account and given due regard to this statutory duty, and the matters specified in Section 149 of the Equality Act 2010 in the determination of this application. There are no known equality implications arising directly from this development.

## **CONCLUSION**

Overall, it is considered that the proposed development would have significant economic and employment benefits for Coventry and the sub-region as a whole and would enable the expansion of a major piece of manufacturing infrastructure to benefit the whole of the UK automotive sector. The Coventry Local Plan further reinforces the need for additional employment land outside but adjacent to the Coventry boundary. It is not considered that there are other suitable and preferable sites that could accommodate the development within the timescales required to increase battery manufacturing in the UK.

Whilst the proposals constitute inappropriate development in the Green Belt there are considered to be very special circumstances which are of sufficient weight to override the harm by way of inappropriateness and the other harm identified. These very special circumstances and the weight to be attached to them are outlined in the Green Belt section of this report. These relate to the economic and employment benefits of the proposals to the sub-region bearing in mind the absence of suitable and preferable alternative sites for the development, the increased public access to green open space within the application site arising as a consequence of the development, the biodiversity enhancement envisaged and the environmental benefits arising.

Subject to conditions and a Section 106 Agreement it is considered that the proposals are acceptable in terms of such matters as transportation; landscape impact; public open space; heritage impacts; noise, air and light pollution; contamination; flood risk/drainage; sequential and other locational issues related to the B2 use proposed; ecology; sustainable building measures; urban design and neighbour amenity impacts.

In terms of those matters over which Coventry City Council has jurisdiction the various highway works proposed are considered acceptable in terms of highway safety, capacity and design matters and in terms of their wider environmental impact in accordance with relevant Coventry Local Plan policies and policies relating to the protection of environmental assets, pollution control and design as detailed above subject to conditions regarding detailed matters and a Section 106 Agreement.

All of the proposed works within Coventry City Council's area are considered to constitute appropriate development in the Green Belt in accordance with Coventry Local Plan Policy GB1 and the NPPF. However it is accepted that these works cannot be considered in isolation

and therefore whilst in compliance with policy the application in its entirety which crosses the boundary of two local planning authorities as well as being located partly within the Green Belt still requires referral to the Secretary of State.

## **CONDITIONS/REASONS**

1. Details of the Appearance, Landscaping, Layout and Scale (hereinafter called “the reserved matters”) shall be submitted to and approved by the local planning authority in writing before any development is commenced and thereafter the development shall be carried out in full accordance with those reserved matters as approved.

**Reason:** *To comply with Article 5(1) of the Town and Country Planning (General Development Procedure) Order 2015.*

2. Application for approval of the reserved matters listed at condition 1 shall be made to the Local Planning Authority before the expiration of 5 years from the date of this permission.

**Reason:** *To conform with Section 92 of the Town and Country Planning Act 1990 (as amended)*

3. The development to which this permission relates shall begin within 5 years of the date of permission or within 2 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. Prior to the commencement of any development, a site wide Phasing Programme shall be submitted to and approved in writing by the Local Planning Authority, which shall:
  - a) Indicate the sequence in which the whole of the development is intended to be carried out. The Phasing Programme shall provide details of the precise location and extent of individual development phases, reference to the type (including details of highways, infrastructure and structural landscaping) and extent of any development in each phase, a description and the intended timing of the commencement and completion of each phase; and
  - b) Specify the scope and timing of each of the following components of the development: -
    - i. Major internal infrastructure including internal roads, pedestrian and cycle crossings, footpaths, cycleways, services, street lighting, Sustainable Urban Drainage Systems (SUDS) and the delivery of any open space, which shall include any temporary access arrangements for vehicles and pedestrians, and temporary drainage works;
    - ii. Confirmation of the scope and timescale for the implementation of offsite highway infrastructure including highway improvements and where required the undertaking of Road Safety Audits, the progressing of Traffic Regulation Orders and other consultation processes;

- iii. The delivery of public transport services and accompanying infrastructure within the site and external to the development;
- iv. The submission of a timescale and mechanism for the stopping up, diversion and reclassification of Public Rights of Way affected by the development, as necessary in agreement with the highway authority.

The provision of all agreed elements in the Phasing Programme shall be carried out in accordance with the approved Phasing Programme and the time triggers specified in it.

**Reason:** *To ensure that in the event of the development being carried out on a phased basis, satisfactory access and interim environmental treatment is provided to address the impact, in the interests of public safety and visual amenity in accordance Policies DE1, EM6 and AC2 of the Coventry Local Plan 2016.*

5. The reserved matters to be submitted in accordance with Condition 1 shall include details of all earthworks, mounding and proposed site levels and the relationship with adjacent land and buildings and such details shall accord with the Parameters Plan forming part of the approved application documentation.

**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 GE1 and DE1 of the Coventry Local plan 2016.*

6. In accordance with the agreed Phasing Programme any soft landscaping referred to in condition 1 shall be completed in all respects within 6 months of the substantial completion of development in that phase. Any such landscaping removed, dying or becoming seriously damaged, defective or diseased within 5 years from the substantial completion of development in that phase shall be replaced within the next planting season with landscaping of a similar size and species to that which they replace. Any replacement hedging, trees or shrubs 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 GE1 and DE1 of the Coventry Local plan 2016.*

7. In accordance with the agreed Phasing Programme, no development shall take place, including any works of demolition unless and until a Construction Environmental Management Plan (CEMP) has been submitted to and approved in writing by the Local Planning Authority. The CEMP should accord with the Best Practice Guidance "The Control of Dust and Emissions from Construction and Demolition" and shall include details of:
  - i. hours of work;
  - ii. hours of deliveries to the site;
  - iii. the parking of vehicles of site operatives and visitors during the demolition and construction phase;
  - iv. the delivery access point;

- v. the loading and unloading of plant and materials;
- vi. anticipated size and frequency of vehicles moving to/from the site;
- vii. the storage of plant and materials used in constructing the development;
- viii. the erection and maintenance of a security hoarding including decorative displays and facilities for public viewing where appropriate;
- ix. wheel washing facilities and other measures to ensure that any vehicle, plant, or equipment leaving the application site does not carry mud or deposit other materials onto the public highway;
- x. measures to control the emission of dust and dirt during demolition and construction;
- xi. measures to control the presence of asbestos;
- xii. measures to minimise noise disturbance to neighbouring properties during demolition and construction;
- xiii. details of any piling together with details of how any associated vibration will be monitored and controlled; and
- xiv. a scheme for recycling / disposing of waste resulting from demolition and construction works.
- xv. Contact details for responsible persons and site personnel training; and
- xvi. information provision and liaison with local residents.

Thereafter, the development shall be carried out in strict accordance with the approved details.

**Reason:** *The agreement of a Construction and Environmental Management Plan prior to the commencement of development is fundamental to ensure a satisfactory level of environmental protection; to minimise disturbance to local residents and in the interests of highway safety during the construction process in accordance with Policies EM7, AC1 and AC2 of the Coventry Local Plan 2016.*

8. In accordance with the agreed Phasing Programme, no development shall take place, including any works of demolition unless and until a construction noise impact assessment has been submitted confirming construction methods/vehicle movements to the methodology contained in BS5228.

**Reason:** *To ensure a satisfactory level of environmental protection and to minimise disturbance to local residents during the construction process in accordance with Policies EM7, AC1 and AC2 of the Coventry Local Plan 2016.*

9. No development shall commence unless and until a noise assessment in accordance with BS4142 'Method for Rating and Assessing Industrial and Commercial Sound' has been submitted to and approved in writing by the Local Planning Authority. The report shall be undertaken by a competent person and evidence of their qualifications shall be included (a list of acoustic consultants can be obtained from the Institute of Acoustics - [www.ioa.org.uk](http://www.ioa.org.uk)). The assessment shall include all activities, building services, plant and machinery and background levels shall be measured over two separate 24 hour periods to be agreed with the Local Planning Authority prior to monitoring being undertaken. The report shall provide a scheme of noise mitigation measures, as necessary, detailing works required to safeguard the amenity of residents in the adjacent residential properties. A map of monitoring points should be

included together with full justification as to why these locations were selected. Calibration certificates for equipment used in the noise assessment must be submitted in the report. Thereafter the approved details shall be carried out strictly in accordance with all the recommendations contained within the approved noise report prior to first occupation of the development and mitigation measures shall be maintained in accordance with the approved details thereafter and shall not be removed or altered in any way.

**Reason:** *To safeguard the amenities of the adjoining occupiers of the development in accordance with Policy DE1 of the Coventry Local Plan 2016.*

10. The development hereby permitted shall not commence unless and until an air quality assessment has been submitted to and approved in writing by the Local Planning Authority. The air quality assessment may be performed using a suitable dispersion model as specified in LAQM.TG(16) due to the complexity and size of the development and shall demonstrate:
- a) that the modelled NO<sub>2</sub> data has been validated and corrected against monitoring data from at least 3 months (preferably 6 months) diffusion tube monitoring performed in accordance with LAQM.TG(16);
  - b) that concentrations of NO<sub>2</sub> and PM-10 at the building façade have been ascertained;
  - c) that a sensitivity test has been undertaken to establish the discrepancy between future-year concentrations, with the previously expected emission reduction and without (as NO<sub>2</sub> concentrations have not been decreasing year-on-year as previously predicted). Background values and emission factors used in the test should be from 2010 (as these are worst case);
  - d) that the meteorological data used is from Church Lawford or Coleshill weather stations and the year used is within the last five years (with the date stated);
  - e) the source of the traffic data used;
  - f) what methods of mitigation will be provided, should the assessment show that concentrations of NO<sub>2</sub> and/or PM<sub>10</sub> at the facades of the residential buildings exceed the air quality standards;
  - g) how consideration has been given to the impact of demolition and construction works;
  - h) what measures will be taken to reduce the air quality impacts from demolition and construction.
  - i) The inclusion of any point source emissions for example from flues/vents serving combustion processes or extraction from manufacturing.

The mitigation measures set out within the approved air quality assessment shall be carried out in full prior to first occupation of the development and these measures shall be maintained in accordance with the approved details thereafter and shall not be removed or altered in any way.

**Reason:** *To protect the amenity of the occupiers of neighbouring residential occupiers in accordance with Policy EM7 of the Coventry Local Plan 2016.*

11. An investigation and risk assessment (in addition to any assessment provided with the planning application); must be completed in accordance with a scheme to assess the nature and extent of any contamination on the site, whether or not it originates on the site, and any report of the findings must be submitted to and approved in writing by the local planning authority. The report of the findings, to be conducted in accordance with DEFRA and the Environment Agency's 'Model Procedures for the Management of Land Contamination, CLR 11', must include;
- i. a survey of the extent, scale, and nature of contamination;
  - ii. an assessment of the potential risk to; human health, property (existing or proposed) including buildings, crops, livestock, pets, woodland and service lines and pipes, adjoining land, groundwaters and surface waters, ecological systems, archaeological sites, and ancient monument;
  - iii. an appraisal of remedial options, and proposal of the preferred option(s).

**Reason:** *To safeguard health, safety, and the environment in accordance with Policy EM6 of the Coventry Local Plan 2016 and the aims and objectives of the NPPF.*

12. The development shall only be undertaken in accordance with a detailed remediation scheme to bring the site to a condition suitable for the intended use by removing unacceptable risks to human health, buildings and other property and the natural and historical environment, which shall be submitted to and approved in writing by the local planning authority. The scheme must include all works to be undertaken, proposed remediation objectives and remediation criteria, timetable of works and site management procedures. The scheme must ensure that the site will not qualify as contaminated land under Part 2A of the Environmental Protection Act 1990 in relation to the intended use of the land after remediation.

**Reason:** *To safeguard health, safety, and the environment in accordance with Policy EM6 of the Coventry Local Plan 2016 and the aims and objectives of the NPPF.*

13. The approved remediation scheme must be carried out in accordance with its terms prior to the commencement of development (other than that required to carry out remediation), unless otherwise agreed in writing by the Local Planning Authority. The Local Planning Authority must be given two weeks written notification of commencement of the remediation scheme works. Following completion of measures identified in the approved remediation scheme, a verification report that demonstrates the effectiveness of the remediation carried out must be produced and is subject to the approval in writing of the Local Planning Authority.

**Reason:** *To safeguard health, safety, and the environment in accordance with Policy EM6 of the Coventry Local Plan 2016 and the aims and objectives of the NPPF.*

14. In the event that contamination is found at any time when carrying out the approved development, that was not previously identified, it must be reported in writing immediately to the Local Planning Authority. An investigation and risk assessment must be undertaken in accordance with the requirements of condition 11, and where remediation is necessary a remediation scheme must be prepared in accordance with the requirements of condition 12, which shall be submitted to and approved in writing

by the Local Planning Authority. Following completion of measures identified in the approved remediation scheme a verification report must be prepared for approval in writing of the Local Planning Authority in accordance with condition 13.

**Reason:** *To safeguard health, safety, and the environment in accordance with Policy EM6 of the Coventry Local Plan 2016 and the aims and objectives of the NPPF.*

15. The development hereby permitted shall not commence unless and until a Desk Study for Potential Unexploded Ordnance Contamination and a risk mitigation strategy has been submitted to and approved in writing by the Local Planning Authority. The development shall only proceed in strict accordance with the approved details.

**Reason:** *To safeguard health, safety, and the environment in accordance with Policy EM6 of the Coventry Local Plan 2016 and the aims and objectives of the NPPF.*

16. Any potential odour processes shall be identified and an odour assessment (including external ducting flues) shall be submitted to and approved in writing by the Local Planning Authority. Any mitigation required / equipment shall be fully installed in their entirety in full accordance with the approved details and inspected by the Local Authority before the use hereby permitted commences. Any external ducting shall be colour coated in full accordance with the approved details within one month of its installation. The equipment shall thereafter be permanently maintained in full accordance with the manufacturer's instructions and be operated at all times when cooking is carried out.

**Reason:** *To safeguard the amenities of the adjoining occupiers of the development in accordance with Policy DE1 of the Coventry Local Plan 2016.*

17. Prior to the first occupation of the development hereby permitted a Landscape and Ecological Management Plan (LEMP) shall be submitted to and approved in writing by the Local Planning Authority. The content of the LEMP shall include the following:
- a. Description and evaluation of features to be managed;
  - b. Ecological trends and constraints on site that might influence management;
  - c. Aims and objectives of management, including mitigation and enhancement for species identified on site;
  - d. Appropriate management option for achieving aims and objectives;
  - e. Prescriptions for management actions;
  - f. Preparation of a work schedule (including an annual work plan capable of being rolled forward over a ten-year period);
  - g. Details of the body or organisation responsible for implementation of the plan, along with funding mechanism(s) for that body or organisation;
  - h. Ongoing monitoring and remedial measures, including where monitoring shows that conservation aims and objectives of the LEMP are not being met.

The LEMP plan shall be implemented in strict accordance with the approved details within three months of the first occupation of the development and thereafter shall not be withdrawn or amended in any way.

**Reason:** *In order to safeguard and enhance habitat on or adjacent to the site in order to secure an overall biodiversity gain in accordance with Policy GE3 of the Coventry Local Plan 2016*

18. The development hereby approved shall not exceed 529,648sqm GIA of B2 as defined in the Town and Country Planning (Use Classes) Order 1987 as amended.

**Reason:** *For the avoidance of doubt and in the interests of proper planning.*

19. The development hereby permitted shall only proceed in strict accordance with a scheme for targeting and utilising local people for construction and employment which shall be submitted to an approved in writing by the Local Planning Authority.

**Reason:** *To secure local employment in accordance with the City Council jobs strategy and Policy JE7 of the Coventry Local Plan (2016).*

20. Prior to commencement of the development hereby approved, drainage details shall be submitted to and approved in writing by the local planning authority and shall include the provision of a Sustainable urban Drainage System (SuDS) in accordance with the latest available design guidance. The submission shall include all relevant details and calculations to enable a full evaluation to be undertaken, and shall include the following: -
- i. Open Air storage or attenuation in the form of a wet pond, dry basin, swale, or other similar surface feature, aimed at managing water quantity and quality and introducing biodiversity at the ground surface;
  - ii. Water quality control medium(s) such as permeable paving, filter drains, rain gardens, ponds or swales aimed at improving the quality of water passing through the system either above or below ground;
  - iii. The use of water harvesting and grey water reuse at individual plot level within the development. This consideration should include both the deployment of water butts, and dedicated tank-based storage where appropriate and any reasons for NOT using should be clearly stated;
  - iv. The deployment of green roof technology on suitable roof structures within the development;
  - v. A detailed strategy for the long-term maintenance of the SuDs and other surface water drainage systems on site.
  - vi. Discharge rates to be managed to Qbar greenfield rates or 5 l/s, whichever is greater. The discharge rates for brownfield sites shall be considered as greenfield in accordance with the CCC SFRA
  - vii. Details to demonstrate that there will be no temporary increases in flood risk, on or off site, during the construction phase, or discharge of surface water to the Public Highway from the completed development.
  - viii. Evidence to show the management of overland flow routes in the event of exceedance or blockage of the drainage system and how the building would be protected in such an event.
  - ix. Foul drainage plans.

**Reason:** *To provide a satisfactory drainage scheme and to reduce the risk of flooding in line with the Water Framework Directive and in accordance with policies EM1, EM4 and EM5 of the Coventry Local Plan 2016 and the principles of the NPPF.*

21. Prior to occupation of the development hereby permitted the following shall be carried out in full accordance with details which shall first be submitted to and approved in writing by the local planning authority: -
- j) Full engineering and constructional details of the cycle track on the northern side of Rowley Road between the Tollbar End roundabout and "Access 1" as shown on drawing 05232-J-0100-P2
    - ii) Full engineering and constructional details of "Access 1" including the cyclist and pedestrian crossings on Rowley Road as shown on drawing 05232-J-0100-P2
    - iii) Full engineering and constructional details of the cycle track on the southern side of Rowley Road between the Tollbar End roundabout and "Access 2" as shown on drawing 05232-J-0100-P2

**Reason:** *In the interests of highway safety and the free flow of traffic on the adjacent highway network in accordance with policies AC2 and AC3 of the Coventry Local Plan, 2016*

22. The development hereby permitted shall be carried out in accordance with the following approved plans:

**Reason:** *For the avoidance of doubt and in the interests of proper planning*