



Originator: Sky Harbour UK Limited
Airpark
Coventry Airport
Rowley Road
Baginton
Coventry CV3 4FR

7th September 2021

Company Registration: 12799015

OBJECTION REPORT PLANNING APPLICATION:

W/21/1370 & OMES/2021/2268 | Outline planning application with all matters reserved apart from access for the development of battery manufacturing facility with ancillary battery recycling capability including landscaping, car parking, access and associated works. | Coventry Airport, Rowley Road, Baginton, Coventry, CV3 4FR

INTRODUCTION:

Sky Harbour UK Limited is a specialist Aviation and Aerospace consultancy that moved to Coventry Airport, taking offices at The Airpark, which is outside of the demise of the application on February 1st 2021. We do however require access to and continuation of the Airport and for it to be fit for purpose in order to trade.

The purpose of this report is to provide Warwick District Council and Coventry City Council with what are undoubtedly important elements of background information, as well as our formal objections. In doing so, we hope it will assist the respective committees in making an informed decision.

LOCATION:

We identified Coventry Airport as being strategically and geographically suited to support customers and clients in the Aviation and Aerospace industry during a period of significant change, post Brexit and in a continuing Covid environment.

With one of the largest Maintenance and Repair Organisations (MRO`s) in the country and a significant number of training organisations, both Approved Training Organisations (ATO`s) and Declared Training Organisations (DTO`s), the airport possesses one of the best paved runways in the country at 2,008m in length, and was identified as being a suitable site for our business.

Good access to airspace conducive to Flight Test and Research and Development lends itself to business development focusing on emerging technologies, such as electrical and hybrid propulsion solutions.

A highly skilled and competent labour market within the West Midlands was also a key factor in our decision making.

As part of the government “levelling up”, we bring to the region over 40 years of experience working with but not limited to, General Electric, Pratt and Whitney, Rolls Royce, Boeing, Airbus Industries, Original Equipment Manufacturers (OEM`s), regulatory authorities and government agencies both within the United Kingdom and internationally.

INVESTMENT:

In 2020 we approached the airport operator Coventry Airport Limited and its parent company the Rigby Group with our commercial aspirations and our requirement for a purpose built facility in the region of 20,000 sq feet. This would lead directly to job creation and employment in a highly skilled discipline: Aviation and Aerospace.

This vision and aspiration was shared with the Coventry and Warwickshire Growth Hub (LEP) with a formal briefing on 7th January 2021 prior to our re-location.

GIGAFACTORY PROPOSAL ANNOUNCEMENT:

The announcement of a proposal for the Gigafactory announced on February 15th 2021 was the first time we as a business stakeholder at Coventry Airport were informed by any party.

PLANNING APPLICATION ANNOUNCEMENT:

We learnt of the planning application on 15th July 2021 through the press. When challenged, a communication was subsequently received by the Airport Operator by way of a notice.

THE APPLICATION:

The documents submitted by the applicant appear to be rushed, with significant errors and omissions. Through the selection of statistical data, the documents present a one sided narrative, that of the applicant.

OBJECTIONS:

We wish to formally submit our strongest objections to the application on the following basis:

- 1) The application is speculative with no defined end user and is in effect for “Change of Use”. Allowing future development of a nature not subject to the rigours of public scrutiny. A tactic commonly known as “Bait and Switch”.
- 2) The application would result in the closure of the Airport, which we require in order to trade and we therefore object.
- 3) The application does not comply with The National Planning Policy Framework (NPPF) July 2021 for Green Belt protection and by definition does not comply with the provision of special circumstances as the application is speculative without an end user.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf
- 4) The application is in conflict with National Policy as covered within the Ministerial Statement by the Rt Hon Robert Courts MP and can be viewed in full via this link:
<https://questions-statements.parliament.uk/written-statements/detail/2021-04-27/hcws941>
- 5) The application is in conflict with CAA Policy (DfT) and is covered within the Civil Aviations Road Map and can be viewed in full via:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/980399/general-aviation-roadmap-spring-2021.pdf

- 6) The application is in conflict with the National Planning Policy Framework (NPPF) for consideration of National Airport infrastructure as defined by Parra 106:

f) recognise the importance of maintaining a national network of general aviation airfields, and their need to adapt and change over time – taking into account their economic value in serving business, leisure, training and emergency service needs, and the Government’s General Aviation Strategy⁴⁵.

It should also be noted that an Airfield is defined within the NPPF as:

General aviation airfields: Licenced or unlicenced aerodromes with hard or grass runways, often with extensive areas of open land related to aviation activity.

Previous development at the airport by the applicant has reduced significantly the volume of extensive areas of open land and further erosion should therefore be prohibited.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1005759/NPPF_July_2021.pdf

- 7) The application is in conflict with the Government Policy for levelling up and directly impacts our business and those of prospective investors. By moving from the South East to the West Midlands with an investment strategy to create jobs at Coventry Airport, we object to the speculative planning application that would result in the Airports closure. We bought into the vision, one that is shared by other entrepreneurs who will think carefully about where they invest if Local authorities fail to protect existing thriving industries within their District:

- *PM hails ‘levelling up in action’ and vows to drive forward his agenda to transform lives and livelihoods by spreading opportunity equally across the UK*

<https://www.gov.uk/government/news/prime-minister-hails-levelling-up-in-action-as-government-unveils-raft-of-new-policies>

8) The proposal and application made in February and July 2021 directly impacted our commercial ability to support Coventry City of Culture 2021. This coupled with the degradation of infrastructure, navigational aids, operating hours and reduced fire cover by the Airport operator, resulted in us cancelling all engagement with our customers. If the application results in the closure of Coventry Airport the net impact on the City of Coventry and Warwickshire as a whole will be significant. Birmingham Airport is not a viable option for our customer base. If the application is approved, we would be unable to facilitate or support the Commonwealth Games in 2022, as our priority would be protecting our business. We object on the grounds of economic damage to the region.

9) The application does not appear to have given sufficient regard to flooding issues.

The Airport is elevated and construction of a structure proposed would add to the cumulative effects of all of the surface water generated by existing and in progress construction.

Cumulative effect of surface water and drainage impact on the River Sowe, River Avon and tributaries cause us concern as to the impact of flash flooding, something that is more prevalent as a result of global warming. The risks posed downstream of flooding are very real. (Ref Objection Mr. David Penson 25/Aug/2021).

NPPF Section 14. *Meeting the challenge of climate change, flooding and coastal change* does not appear to have been given due consideration in the applicants submission when taken into context cumulatively.

<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map?easting=427933&northing=264515&map=SurfaceWater>

10) The application does not comply with both local and district plans. Something that is covered in detail by local resident objections.

11) The application covers the subject of business closures, job losses, unemployment and hardship with what appears to be deemed as being acceptable “collateral damage” (Our parenthesis). We object to the loss of businesses and employment.

12) Supporting documents submitted with the application appears to write “Ecology” off as not being a factor. However, bio diversity is a significant contributor at airfields. Whilst there are paved surfaces at Coventry Airport, the majority of surface area is of open grassland and with competent management, can add to carbon off setting in practical ways, as well as provide fauna and wildlife to embrace the Green Belt categorisation that already exists.

An example can be reviewed via the link which states: *“This has made us realise that General Aviation, and airfields, may unwittingly be sitting on land that is more important to the nation than you would have previously thought.”*

<https://www.flyer.co.uk/bodmin-airfields-are-environmental-heroes/>

13) The application does not take into account risk and airborne contamination in the event of fire. Prevailing winds are not only likely to put at risk local villages but the City of Coventry. The tragic fire at Royal Leamington Spa 27th August 2021 of a manufacturing facility showed graphically the meteorological effect of prevailing winds. Coventry Airport sits on a plateau that in the event of Fire could potentially put at risk an entire city. There is a reason why Battery manufacturing facilities are not built near centres of population and it is public safety.

https://www.coventry.gov.uk/info/195/facts_about_coventry/2435/population_and_demographics

14) The application does not appear to contain stakeholder reports from Warwickshire Fire and Rescue or Coventry Fire Service covering the required Emergency Response Plan.

15) The application does not appear to contain stakeholder reports from the NHS local trusts as part of an Emergency Response Plan.

16) The application does not appear to contain stakeholder reports from the Local and County Police authorities covering the required Emergency response Plan.

17) The application does not appear to contain stakeholder input from HM Government as part of Emergency Response and Recovery.

<https://www.gov.uk/guidance/emergency-response-and-recovery>

18) The application is at odds with industry norm for the construction of battery manufacturing facilities and decommissioning sites, away from areas of population.
<https://www.theguardian.com/australia-news/2021/aug/02/tesla-big-battery-fire-in-victoria-burns-into-day-three>

19) The application references the fact that at present, no public access is available for amenity. This should be clarified as being at the behest of the Airport operator and current leaseholder.

Retained as an Airport there is no reason whatsoever why the public could not benefit from amenity access within a secure environment as is demonstrated by the active engagement of stakeholders at Manchester International Airport:
<https://www.manchesterairport.co.uk/at-the-airport/attractions/>

20) The application touches on “Heritage” in a casual manner that does not reflect the reality of the significant historical importance of Coventry Airport.

Heritage and vintage aviation is a significant part of Coventry Airport today.
<http://www.midlandairmuseum.co.uk/explore.php>

In addition to the museum, some of the most talented aircraft restorers in the country work on and maintain historical aircraft at the airport. A recent documentary supporting the restoration of a C47 for commemorative D Day events was conducted in a hangar at Coventry Airport.
<https://ddaysquadron.org/meet-charlie-walker-with-c-47-night-fright-dc-3-society-restoration-member/>

Government recognition of our heritage extends culturally across and includes aviation. The Rt Hon Robert Courts stated recently:

“Historic aviation restoration and heritage projects undertaken across the country not only help remind us all of the importance of honouring our nation’s glorious aviation history, but are also vital to inspire the next generation of engineers, pilots, aviation enthusiasts and professionals, as well as supporting local tourism and the creation of jobs.”

In order to deliver on this vision and desire, we need men and women with the skill and expertise in vintage historic aircraft. Currently this is performed at Coventry Airport.

<https://www.pilotweb.aero/news/robert-courts-expresses-support-historic-aviation-sector-8276780>

- 21) The application fails to recognise the significant contribution Coventry Airport has made to training future Pilots over the decades.

Pilot training has been hampered significantly by the applicant's reduction of airport services and switching off of navigation aids. The result of which has forced numerous training organisations to move away, despite the airport having one of the best runways in the country for multi engine training.

The reduction in aircraft movements for training is a reflection of lost infrastructure and whilst supporting a narrative for a speculative planning application, it does nothing for the country's requirements of training competent, highly skilled entrants of the future.

Despite Covid, industry forecasts show clearly that the next ten years will require pilots.

<https://www.pilotcareernews.com/cae-forecasts-pilot-demand-returning-by-end-of-2021/>

- 22) 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.

Aerotech Aircraft Maintenance Limited has been a significant contributor to the local economy and has an International reputation for supporting Business and General Aviation Aircraft that in turn integrates the region and the country with trade and commerce.

The closure of the airport will no doubt cause them to either move or if no suitable alternative is available, close, bringing with it redundancy and hardship to the very people that have contributed to the regional economy.

It is not for us to identify a suitable alternative and is outside of our scope. However, the loss to the region again is at odds with the NPPF, Ministerial statement and CAA GA Roadmap.

MRO`s, such as those based at Coventry Airport, feed into the National and Global employment structure. The following forecast from Boeing provides an insight into the future:

<https://www.boeing.com/commercial/market/pilot-technician-outlook/>

- 23) 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.

The recognition of the 4th industrial revolution, utilising non fossil fuel modes of transportation are not limited to the Automotive Industries but apply equally, to the Aviation and Marine Industries. Cars need roads, ships need harbours and aircraft need airports, it`s as simple as that.

<https://www.airbus.com/innovation/zero-emission/urban-air-mobility.html>

- 24) Coventry Airport is home to the Warwickshire and Northamptonshire Air Ambulance. We object to the application, on grounds of public safety.

- 25) The residents of nearby villages and communities have endured years of disruption as a result of development. Well being, noise and airborne pollution from both the construction and construction traffic have had a direct impact on the quality of their lives. The construction of either a Gigafactory or Commercial buildings as a result of the granting of the application, would subject them to undue distress.

- 26) Any further development will undoubtedly impact property values for residents in local communities. Impacting residents economic planning for their future.

CAUSAL FACTORS:

The conduct of the joint applicants and their relationship over the course of the last ten years is outside the scope of this report.

However a clause within the Head Lease originally required the operator to “.....*maintain the site as an operational airport.*” As contained in correspondence originating from Coventry City Council July 2017.

Coventry Airport Limited released a statement to Airport stakeholders (Businesses) in June 2017 that changes it was implementing “.....ensuring the Airport is best placed to serve the needs of the GA community in the most suitable way.”

Coventry Airport Limited released a statement to Airport stakeholders (Businesses) in August 2016 that changes it was implementing “.....is essential to secure the Airport’s ongoing operation into the future, thereby enabling it to continue to play its role in the regional economy”.

As a result of the sale of thirty acres of land to investors Ostrava Developments a press release was issued by Coventry Airport Limited in July 2015 referring to the subject land as “defunct” and stated “.....the south side of the airport at Middlemarch the land is redundant for aviation purposes and disposal of that as a site for commercial development will make a significant contribution towards the airport’s future investment and financial strength”.

A spokesperson for Ostrava Developments, commented:

“It’s a win-win situation. While we focus on building a first rate business hub to serve the local community, the airport will be investing in significantly improved premises close to the airports main terminal, increasing the throughput of executive passengers and making the area even more attractive to outside businesses and investors.”

It is for Coventry City Council and Warwick District Council to determine if Coventry Airport Limited have delivered on previous developments with actual job creations, investment in the Airport and created net benefits that validate their previous non aviation commercial developments. As well as full compliance of their existing lease from inception.

It therefore follows that in order to determine the likelihood on the applicant delivering on promises, the applicants track record of promises and delivery to date since taking over the lease in 2010 for Coventry Airport requires considerable “Due Diligence”.

POLITICAL PRESSURES:

There has and clearly continues to be significant political pressure to push the application through as quickly as possible.

Politicians as we all know come and go. It is therefore incumbent on the Planning Authority to retain their independence and serve as officers of the community to make judgement on the long term benefits of an application independent of external pressures.

CONCLUSION:

We object to the granting of a speculative application for change of use W/21/1370 & OMES/2021/2268.

DISCLAIMER:

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For and on behalf of:

Sky Harbour UK Limited

Steve Ford

CEO

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