

Our ref: Burtonwood Local Plan Rep Dec 16

Your ref:

Warrington Borough Council
Planning Policy and Programmes
New Town House
Buttermarket Street
Warrington
Cheshire
Wa1 2NH

5 December 2016

Dear Sir/Madam

Warrington Local Plan Consultation October 2016

Please find below a representation prepared by GL Hearn on behalf of Thomas Hardy Holdings Limited ('THH') in response to Warrington Borough Council's (WBC) consultation on the Local Plan Review 'Scope and Contents Document' dated October 2016. These representations relate specifically to THH's landholding at Bold Lane, Burtonwood, Warrington ('the site'), as shown edged red on the accompanying Site Location Plan at **Appendix A**.

Please also find attached a completed call for sites form.

Burtonwood

Thomas Hardy Holdings Ltd operates a head office function from the Burtonwood site and has traded there since 1998 supporting a group of 120 employees. Head office headcount at Burtonwood is 6 employees. THH also support a number of local businesses such as welders/fabricators, builders, plumbers, electricians and cleaners.

The group's main activity is a contract bottler/packager for national and multi-national beverage companies, including Heineken, Bacardi Martini, Molson Coors, Britvic, Fever Tree, Fentimans, Global Brands, Carlsberg and the SHS Group. Specifically on this site Thomas Hardy Burtonwood Ltd operates as a contract bottler and employs around 50 employees.

Demand for the group's services is growing and the business is currently considering a number of strategic options for a new canning line which will require additional warehouse accommodation. One of the options is at Burtonwood and could include the installation of a canning line along with an additional bottling line within a permanent warehousing facility and bottling hall.

Current business requirements places the additional floorspace need at around 70,000 square feet and any potential expanded site would require approximately 100 employees for the bottling business with additional 25-30 employees for any prospective canning business.

Purpose of the Representations

The key purpose of this representation is for the site to be acknowledged as an existing developed site which should be removed from the Green Belt in order to assist THH in expanding the business should the Burtonwood site continue to be THH's preferred location for the group's expansion.

THH are keen to work collaboratively with WMBC to deliver a 'sound' Local Plan Review which meets the identified employment needs in the Borough. We would welcome future meetings with WBC Policy Officers and the local community to discuss the development opportunities at the site.

In terms of the detailed questions raised in the Regulation 18 Consultation: Standard Response Form, this representation seeks to answer questions 1 and 6.

Question 1 - Do you have any comments to make about the Council's evidence base?

THH have specific comments on the following evidence base documents which should be taken into account by the Council in the preparation of the Draft Local Plan:

- Warrington Economic Needs Study (October 2016); and
- Warrington Borough Green Belt Assessment (October 2016).

Warrington Economic Needs Study (October 2016)

It is noted that THH were not consulted upon when the evidence base for economic needs was prepared, despite being a longstanding employer in Warrington Borough Council's Authority area.

In terms of the study itself, it is noted that it identifies a realistic land supply of 104.53 ha, at 31st March 2016. This is not sufficient to meet needs over the period 2016-2037 as the report indicates a need of 380.90 ha to 2037, incorporating a five-year buffer. Measured against the Borough's current realistic supply there is a shortfall of around 276ha.

A key task for the Local Plan will therefore be to identify further locations for B1/B2/B8 provision.

Warrington Green Belt Assessment (October 2016)

Overall, THH agree that exceptional circumstances exist that warrant amending the Green Belt boundaries and are very supportive of the release of sites from the Green Belt sites to meet identified development needs.

Paragraph 2.20 of the Scope and Contents Document is clear in stating *"If Warrington is to meet its development needs, then based on the updated assessment of urban capacity, sufficient Green Belt land will need to be released to deliver approximately 5,000 homes and **261 hectares of employment land** over the next 20 years"*.

It is unclear why the Scope and Contents Document identifies 261 Ha, where as the evidence identifies a need for 276 Ha. Either way a substantial level of additional employment land is required to be identified and this will principally be found within the Green Belt.

Despite this, paragraph 5 of the introduction to the Green Belt Assessment seems to suggest that the Assessment is undertaken solely to accommodate housing needs in full.

If the Green Belt Assessment only considers sites for housing, then there is a fundamental shortfall in Warrington's evidence base. Failure to properly assess and identify suitable and deliverable sites for employment needs will undermine Warrington's predicted economic growth.

Approach of the Assessment

The study was undertaken in two stages, Stage 1 – General Area Assessment and Stage 2 - Green Belt Parcel Assessment. Stage 1 involved dividing the entire Warrington Green Belt into large parcels ('General Areas') which were then assessed against the five purposes of the Green Belt. Stage 2 involved defining smaller Green Belt parcels around settlements on the edge or inset from the Warrington Green Belt and assessing these parcels for their contribution to the five purposes of the Green Belt.

At Stage 2, 203 no. parcels were defined and assessed against the five purposes of the Green Belt and all sites adjoin urban areas. The Assessment then considers the identified parcels against the 5 purposes of including land within the Green Belt as identified in the NPPF. THH have a number of issues with the assessment undertaken including:

- inconsistencies in the assessment criteria such as what is considered a 'durable boundary';
- the assessment of openness which confuses 'openness' and 'visual impact';
- the arbitrary use of a 250m buffer around heritage features;
- an incomplete assessment of derelict land which does not assess developed or previously developed sites within the Green Belt

At no point have developed or previously developed sites within the Green Belt been considered. Sites such as Burtonwood include significant existing structures within the Green Belt and it makes a notable contribution to generating and supporting employment within the Borough. These sites should be considered for their potential to contribute to the purposes of land within the Green Belt. Notwithstanding the general issues identified above with the assessment, an assessment of the site is considered below:

Purpose 1: To check unrestricted sprawl of large built up areas

The site is not located adjacent to the Warrington urban area and has clearly defined defensible boundaries on all sides. As such, the site makes no contribution to this purpose.

Purpose 2: Prevent neighbouring towns from merging into one another

The development of the site would not lead to coalescence and as such it makes no contribution to this purpose.

Purpose 3: To assist in safeguarding the countryside from encroachment

The existing site contains the existing Thomas Hardy Brewery. This is a significant existing development in the Green Belt with the existing bottling plant extending to approximately 65,000 sq ft, with the site also including around 1,000sqft of offices and workshops along with a significant area of hardstanding for the manoeuvring of HGV's and the parking of vehicles. The wider site ownership also includes White House Farm, which in itself is a significant red brick farmhouse and its associated fields. As identified above the potential expansion of the business could double the existing premises.

As such, the existing site makes no contribution to this purpose, although White House Farm could be considered to make a moderate contribution to this purpose

Purpose 4: to preserve the setting and special character of historic towns

The site is not itself or in close proximity to any historic features; therefore it is considered that the site makes a weak contribution to this purpose

Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

This parcel is not connected to the urban area along any boundaries and should be assessed as providing 'no contribution' to this purpose.

The overall assessment of the site is summarised below:

Table 1: Assessment against the five Green Belt purpose

Green Belt Purpose	Burtonwood
1 to check the unrestricted sprawl of large built-up areas	No contribution
2 to prevent neighbouring towns merging	No contribution
3 to assist in safeguarding the countryside from encroachment	Weak/Moderate contribution
4 to preserve the setting and special character of historic towns	No contribution
5 to assist in urban regeneration	No contribution
Overall assessment	Weak contribution

The evidence identifies that parcels which are assessed as making a lower contribution towards Green Belt purposes have the greatest potential to be considered for release. Based on the assessment above, the site clearly makes an overall weak contribution to the Green Belt.

The site should therefore be removed from the Green Belt. This will assist THH in maintaining the Burtonwood site as the preferred location for the group's expansion. It will also address some of the shortfall in employment land within Warrington as well as securing jobs and investment in the Borough.

Question 6. Do you consider that Green Belt land will need to be released to deliver the identified growth?

The evidence presented by WBC clearly demonstrates that there is insufficient land to meet its housing and employment needs within the urban area. Paragraph 83 of the NPPF states that (GLH emphasis in bold):

*"Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be **altered in exceptional circumstances**, through the **preparation or review of the Local Plan**. At that time, authorities should consider Green Belt boundaries having regard to their **intended permanence in the long term**, so that they are capable of **enduring beyond the plan period**."*

Given the deficit in employment land identified it is considered that exceptional circumstances exist to release Green Belt land. This Local Plan Review therefore represents an opportunity to review the Green Belt boundary, acknowledge existing and previously developed sites in the Green Belt and removing sites which no longer contribute to the purpose in retaining land within the Green Belt, especially those which can meet Warrington's development needs beyond the Plan period.

Overall Conclusions

This representation is prepared by GL Hearn on behalf of Thomas Hardy Holdings Limited ('THH') in response to Warrington Borough Council's (WBC) consultation on the Local Plan Review 'Scope and Contents Document'. It relates specifically to THH's landholding at Burtonwood Brewery, Bold Lane, Burtonwood, Warrington ('the site'), as shown edged red on the accompanying Site Location Plan at **Appendix A**.

Measured against the Borough's current realistic supply, the Warrington Economic Needs Study identifies that there is a significant shortfall in employment land of around 276ha. THH agree that exceptional circumstances exist that warrant amending the Green Belt boundaries and are very supportive of the release of sites from the Green Belt sites to meet identified development needs.

In terms of the Green Belt Assessment, the site has not been assessed for release. Given its level of existing and potential development, sites such as this should be considered for their potential to contribute to the Green Belt and to the significant development needs identified in Warrington. Notwithstanding the issues

identified with the Green Belt Assessment, an assessment of the site has been undertaken and is identified below:

Green Belt Purpose	Burtonwood
1 to check the unrestricted sprawl of large built-up areas	No contribution
2 to prevent neighbouring towns merging	No contribution
3 to assist in safeguarding the countryside from encroachment	Weak/Moderate contribution
4 to preserve the setting and special character of historic towns	No contribution
5 to assist in urban regeneration	No contribution
Overall assessment	Weak contribution

Based on the assessment above, the site clearly makes an overall weak contribution to the Green Belt. Therefore the site should be removed from the Green Belt.

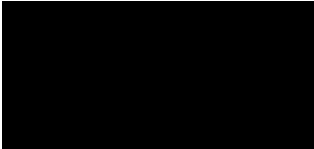
Removing the site from the Green Belt will assist THH in maintaining the Burtonwood site as the preferred location for the group's expansion. It will also address some of the shortfall in employment land within Warrington as well as securing jobs and investment in the Borough.

As a minimum the site should be acknowledged as development site in the Green Belt where additional expansion would be supported.

I trust that this representation will be taken into full consideration in the preparation of the Preferred Options consultation document and THH looks forward to working collaboratively with Warrington Borough Council in encouraging and supporting investment in the borough.

We would be grateful if you could ensure that we are on the mailing list to receive notifications of future Local Plan Review updates and consultations

Yours sincerely



Phil Robinson
Planning Associate Director

