



GERALDIVE

Planning Statement

Perfect Draught Building, Magor Brewery

On behalf of Budweiser Brewing Company Limited

Contents

Page Appendices

1	Introduction	3
2	Site Description and Allocations	5
3	Planning History	7
4	Proposed Development	9
5	Planning Policy	11
6	Planning Issues	13
7	Conclusion	18

1 Introduction

1.1 This Planning Statement has been prepared on behalf of Budweiser Brewing Company Limited (“the Applicant”) in support of a planning application that seeks planning permission for the construction of a new production building and associated development at its existing brewery at Newport Road, Magor, Caldicot, NP26 3RA.

1.2 The proposed description of development is:

“Erection of a new building comprising 10,015 sq m of manufacturing, laboratory and office accommodation (Use Classes B1 and B2) with ancillary canteen facilities; reconfiguration of internal site road, HGV parking and external storage areas; erection of 8 bright beer tanks and associated building (116 sq m); and associated works.”

1.3 This planning application has been submitted electronically via the Planning Portal (Portal reference: PP-10137903).

1.4 The following documents have been submitted as part of this planning application:

- Planning application forms (signed and dated)
- Land ownership certificates (signed and dated)
- Site location plan (1:1250) – reference: O2082_01.01
- Planning Statement – prepared by Gerald Eve LLP
- Design and Access Statement - prepared by Gerald Eve LLP
- Ecology assessment - prepared by Tyler Grange LLP
- Landscape and Visual Impact Assessment including proposed Landscape Strategy and Green Infrastructure Masterplan - prepared by Tyler Grange LLP
- Tree Quality Survey and Arboriculture Impact Assessment - prepared by Tyler Grange LLP
- Lighting Assessment – prepared by Redmore Environmental Ltd
- Transport Statement – prepared by Peter Evans Partnership
- Flood Risk Assessment and Drainage Strategy – prepared by Patrick Parsons
- Geo-Environmental Site Assessment – Prepared by Patrick Parsons
- Plans and drawings prepared by IPS Group:

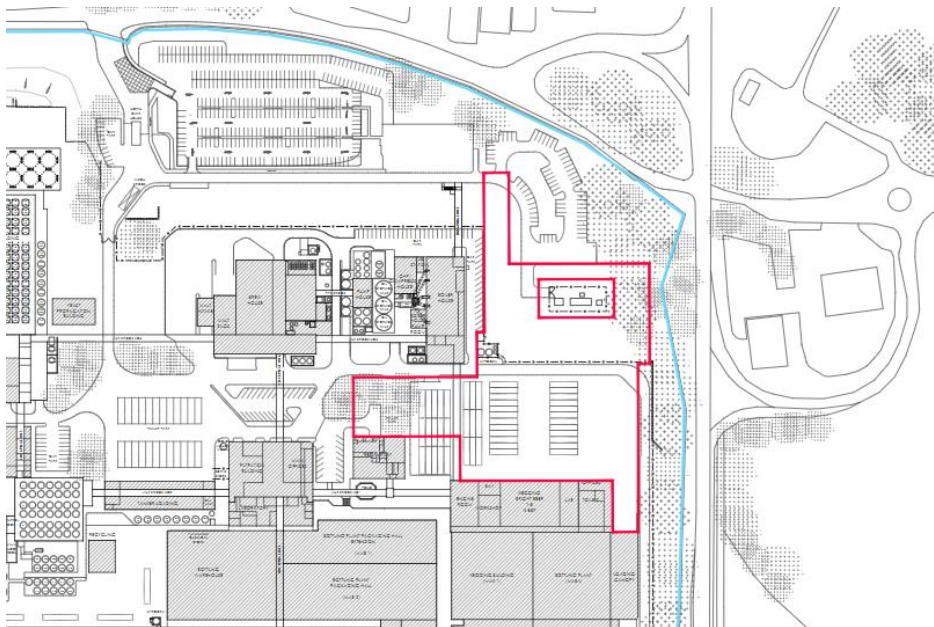
- O2082_01.2 – existing site plan
- O2082_01.6 – proposed site layout plan
- O2082_01.7 – proposed ground floor plan
- O2082_01.8 – proposed mezzanine floor plan
- O2082_01.9 – proposed first floor plan
- O2082_01.10 – proposed roof plan
- O2082_01.11 – proposed north elevation
- O2082_01.12 – proposed south elevation
- O2082_01.13 – proposed west elevation
- O2082_01.14 – proposed east elevation
- O2082_01.16 – proposed BBTs (layout and elevations)

- 1.5 A payment has been made via BACS direct to the Council in the amount of £62,560, this being the requisite statutory planning application fee in this instance (i.e. new non-residential buildings totalling 10,131 sq m).
- 1.6 In line with the Planning (Wales) Act 2015 (as amended), applicants proposing major development are required to show how the consultation requirements have been adhered to as part of planning application submissions. This proposal has been subject to the required 28 day consultation period and a Pre-Application Consultation (PAC) Report is provided as part of this submission.
- 1.7 In addition, as the proposed development exceeds the corresponding floorspace threshold for food/drink manufacturing developments, a formal request has been submitted to Monmouthshire County Council to adopt a Screening Opinion in line with Regulation 5 of The Town and Country Planning (Environmental Impact Assessment) (Wales) Regulations 2016, to confirm whether or not the planning application should be accompanied by an Environmental Statement. At the time of writing, the Council's response remained pending.
- 1.8 This Statement reviews the application site's planning history, provides a detailed description of the site, its surroundings and the proposed development and also sets out the planning policy context within which the proposal can be determined. The Statement assesses the key planning issues providing justification for how the proposals fit within the planning policy context and concludes with a summary of the report.

2 Site Description and Allocations

Site Description

- 2.1 The Applicant's existing brewery is located approximately 1 mile to the west of the village of Magor, Caldicot, and is situated to the south-west of Junction 23a of the M4 motorway. The brewery is accessed via a security gatehouse off B4245 Newport Road and also includes a secondary access to the south, off the roundabout on the A4810 Queens Way.
- 2.2 The planning application site is located within the north-eastern part of the existing brewery facility and comprises approximately 1.45 hectares of land. The application site is outlined in red and the extent of InBev's land ownership is shown edged in blue on the Site Location Plan (plan reference: reference: O2082_01.01) – see extract below.



- 2.3 The existing site comprises a mixture of existing trailer parking, hardstanding, areas of grass, shrubs and trees and open storage. An existing elevated walkway crosses the application site's western edge, which will be retained.

Allocations

- 2.4 The Development Plan comprises the Monmouthshire County Council Adopted Local Development Plan ("Local Development Plan"), which was adopted in February 2014.
- 2.5 Local Development Plan Policy SAE2 Protected Employment Sites protects the entire Magor Brewery site for industrial and business development (Use Classes B1, B2 and B8).



- 2.6 The emerging Local Development Plan Review Preferred Strategy (June 2021) Strategic Policy 13 confirms that existing employment land and premises that continue to be required for employment purposes will be protected from alternative forms of development.
- 2.7 A full review of the relevant Development Plan policies and other relevant policy guidance is provided within Section 5 of this Statement.

3 Planning History

3.1 A review of the site's planning history was carried out using the Council's online planning register. The brewery has a long and complex planning history primarily relating to the operational, storage and distribution requirements of the brewery business. Details of some of the most recent planning applications have been included below relating to the main brewery complex.

Reference	Description	Decision	Date
DM/2021/01001	Extension to the existing yeast propagation building alongside associated works.	Pending	TBC
DM/2020/00103	Erection of sixteen fermentation vessels, enclosed supporting structure and external stairs; extension of existing high level access walkway; earth works; and temporary works including re-use of existing car park as vessel assembly site, creation of two temporary replacement car parks, temporary site roads and walkways, and associated works	Granted	17/12/20
DM/2019/01577	Extensions to existing production building to south to create storage area (994.6 sqm GEA), and east to create new delivery building (429.6 sqm GEA)(Use Class B), external lighting, external ramp, and associated works	Granted	11/12/19
DM/2019/00915	Extension to existing yeast propagation building, implementation of a new loading/unloading area with associated internal roadway alterations, boundary treatment works and associated works.	Granted	12/09/19
DM/2019/00862	Erection of four silos	Granted	03/09/19
DM/2018/01991	Upward extension to Warehouse 2 by 20 metres to provide automated racking system internally	Granted	17/04/19
DC/2017/00465	Erection of tented warehouse (1,221 sq m)	Granted	06/07/17



- 3.2 Recent planning decisions confirm that the Applicant is active in developing its infrastructure to improve operational efficiencies on site through the creation of warehousing and production facilities.

4 Proposed Development

4.1 The proposals consist of the following elements of development:

- Erection of a new two-storey building comprising 10,015 sq m of floorspace for production, laboratory space, office accommodation and canteen/amenity areas
- Reconfigured external storage areas and vehicular circulation
- Erection of 8 no. bright beer tanks and associated control building (116 sq m)

4.2 The proposals extend across a parcel of land within the north-eastern part of the brewery site.

Perfect Draught Building

4.3 The proposed perfect draught building is proposed to be located on the eastern side of the brewery site, on an area of existing hardstanding/trailer parking. The building would contain a mix of uses as follows:

- Ground floor (4,508.19 sq m) – production line for perfect draught beer kegs
- Mezzanine (998.33 sq m) – control room, amenity area and canteen
- First floor (4,508.19 sq m) – laboratory accommodation and office space.

4.4 The building is proposed to have a gross external floor area of 10,015 sqm and a height of approximately 16 metres. The building's northern elevation will include three loading docks for deliveries and distribution.

4.5 External materials and finishes are proposed to match existing surrounding buildings. Lighting is to be installed to all elevations to facilitate safe working practises. No free-standing lighting columns are proposed, and proposed luminaires would be directed to operational areas only.

4.6 The Applicant intends to deliver the building in two stages as a result of commercial pressures to complete the ground floor production line, and less urgency to deliver the first-floor accommodation. The submitted drawing pack therefore includes details of how the building

will look following completion of the ground floor (i.e. Phase One) and also on completion of the first floor (i.e. Phase Two).

- 4.7 It is intended that construction will commence at the earliest opportunity in order to deliver the first phase of development; however, at this stage, timescales for completing the entire building are not fixed. The Applicant proposes to keep the council informed when it intends to complete the building (subject to planning permission being granted).

External Areas

- 4.8 The proposed development includes two areas of external storage to the west and a third area immediately adjacent to the building's northern elevation. The proposed 'empties external storage' areas will be capable of storing approximately 4,820 pallets within a total area of 1,640 sq m in area. Pallets would be stored to a maximum height of three, less than half the height of the proposed building.
- 4.9 Immediately east of the proposed building, a parking area is proposed for tankers set within an area of approximately 775 sqm.
- 4.10 The proposals also include an extended area of internal roadway and hardstanding of approximately 5,000 sq m to assist the reconfiguration of vehicle circulation areas within the brewery site. This will allow safe access for vehicles using the proposed perfect draught building as well as maintaining safe access for other vehicles using the existing perimeter road to other parts of the brewery.
- 4.11 Finally, as part of the proposals, the existing fence to the north-east corner of the site will need to be extended slightly into an existing landscaped area.

Bright Beer Tanks (BBTs)

- 4.12 Eight BBTs are proposed in a 2x4 grid formation to the south east of the proposed perfect draught building, and east of the existing mixed use building. The BBT's and associated control building are proposed to be 12 metres in height and will be set within an area of approximately 400 sqm. Within the same area, a control building is also proposed comprising 116 sq m of floorspace (14.55m X 7.95 m) and extending to 8 metres in height. The building will be used for cleaning and control purposes associated with the BBTs.

5 Planning Policy

- 5.1 This section sets out the relevant national and local planning policy context relating to the application site and the proposed development.

The Development Plan

- 5.2 The Development Plan comprises the Monmouthshire County Council Adopted Local Development Plan (“Local Development Plan”), which was adopted in February 2014.
- 5.3 The Local Development Plan is currently under review and a Preferred Strategy document is out for public consultation between 5 July and 31 August 2021.
- 5.4 It is noted that the Deposit Plan will then be prepared and considered by Council prior to a statutory six-week consultation and engagement period in Summer 2022. As such, emerging policies are viewed as having limited weight at present. Notwithstanding this, it is noted, as set out in Section 2 that Strategic Policy 13 confirms that existing employment land and premises that continue to be required for employment purposes will be protected from alternative forms of development.
- 5.5 The following policies are considered to be relevant to the proposed development:

Policy SAE2 Protected Employment Sites protects the entire Magor Brewery site for industrial and business development (Use Classes B1, B2 and B8).

Policy S8 Enterprise and Economy permits development proposals that seek to deliver the Council’s vision for sustainable economic growth, particularly where they enable, inter alia:

“a) the continued development of existing key economic sectors...”

Policy EP3 Lighting requires proposals including external lighting to comply with a number of criteria including, inter alia, ensuring it is necessary for the development, ensuring light spillage is minimised and potential impacts on biodiversity are taken into account.

Policy NE1 Nature Conservation and Development seeks to protect, positively manage and enhance locally designated sites of biodiversity and geological importance and priority species and habitats. Where nature conservation interests are likely to be disturbed or harmed by development proposals, applications must be accompanied by an ecological survey and assessment of the likely impact of the proposal on the species /habitats

Policy DES1 General Design Considerations indicates that all development should be of a high quality and sustainable design and respect the local character and distinctiveness of Monmouthshire's built, historic and natural environment and sets out specific criteria to be met.

Planning Policy Wales, February 2021

- 5.6 Planning Policy Wales defines economic development as:
"...the development of land and buildings for activities that generate sustainable long-term prosperity, jobs and incomes." (Para 5.4.1)
- 5.7 Planning Policy Wales also states that:
"Wherever possible, planning authorities should encourage and support developments which generate economic prosperity and regeneration." (Para 5.4.4)
- 5.8 Planning Policy Wales provides a significant amount of information on placemaking and design and confirms that:
"Site and context analysis should be used to determine the appropriateness of a development proposal in responding to its surroundings. This process will ensure that a development is well integrated into the fabric of the existing built environment..." (Para 3.14)
- 5.9 The Magor brewery is an industrial employment site that has been developed primarily from operational need as opposed to aesthetic values. It has been designed to have a generally attractive appearance from the main site frontage, but buildings and structures are essentially operationally driven from a design point of view and fit within the context of the existing site as required by national policy.

6 Planning Issues

6.1 It is considered that the proposed development raises a few planning issues, both in terms of the highway safety benefits that would be delivered as a result of the proposal as well as existing on-site constraints that need further justification in order to make the development acceptable in planning terms.

6.2 The following issues have been discussed within this section:

- Principle of Development
- Transport
- Arboriculture
- Landscape and Visual Impact
- Ecology
- Lighting
- Flood Risk
- Ground conditions

Principle of Development

6.3 The proposed production building and associated works predominantly fall within Use Classes B1 and B2, as defined by the Use Classes Order 1987 (as amended). The buildings, tanks and associated external works have all been designed to be in keeping with the industrial nature of the brewery site including similar design, appearance and access arrangements. The proposed ancillary uses, including staff amenity area and canteen, are also considered to be consistent with the mix of uses on a major industrial site such as the brewery. The development is therefore considered to be wholly in keeping with the brewery's site designation under Policy SAE 2.

6.4 In terms of design, the main building is modest in scale at two storeys in height and a footprint of approximately 4,500 sq m. The building is consistent in scale and appearance with adjacent buildings as well as the wider brewery site, which includes much larger buildings of up to 20 metres in height, one of which has planning permission in place for an extension up to 40 metres (warehouse 2 in the central-western part of the brewery). The proposed development is therefore considered to be consistent with the criteria of Policy DES1.

6.5 The development is expected to generate numerous new jobs on site as well as further employment opportunities within the brewery's national supply chain. It is estimated that

approximately 50 new jobs would be created at the Magor brewery as a result of the proposals, which would be split across 4 shifts (i.e. 10-12 additional staff on site at any one time). The building will therefore have a positive economic impact both at a local and national level, consistent with the objectives of Planning Policy for Wales and local Policy S8.

- 6.6 The principle of development for new employment and industrial uses on a major allocated industrial site is considered to be wholly appropriate both in terms of appropriate land uses, location and design and economic benefits.

Transport

- 6.7 A transport statement has been prepared in support of this planning application by Peter Evans partnership, which considers the traffic implications of the proposed perfect draught building.
- 6.8 The key considerations from a transport and highways perspective are two-fold: firstly, the potential impact of additional HGV and commercial traffic; and secondly, the potential impact of additional staff vehicles.
- 6.9 In terms of HGV traffic, it is estimated that the perfect draught building would be serviced by approximately 20 HGVs per day, including delivery of raw goods, recycling, logistics trips (i.e. returned empty kegs and distribution of full kegs). As such, HGV movements are expected to average less than 1 per hour based on the Site's 24 hour operation. This limited daily flow of HGVs is reflected in the need for only 3 loading docks. HGVs serving the perfect draught building would enter the brewery via the main northern entrance, but would exit via the southern access, via the eastern internal site road helping to spread the distribution of HGV movements.
- 6.10 In terms of logistics, the brewery would distribute products to its logistics hubs in Leeds, England, and Lille, France. This approach would minimise HGV numbers compared to delivering directly to customers (e.g. supermarkets, third party distributors etc), which would significantly increase trip numbers.
- 6.11 The proposed development is likely to result in the creation of approximately 40-50 new jobs at the brewery, which will be split between 4 shifts (i.e. circa 10-13 per shift). The shift pattern at the brewery remains as two daily 12-hour shifts with changeovers at 7am and 7pm. Sufficient parking provision exists on site to accommodate this slight uplift in staff numbers. As such, the impact of an estimated 10-13 additional two-way car journeys at shift changeover times would result in limited impact on the main access and local road network.

- 6.12 Overall, the proposed development would not materially affect the capacity of the local highway network and the transport statement confirms that the existing northern entrance has sufficient operational capacity to accommodate the uplift in vehicle movements.

Arboriculture

- 6.13 A Tree Quality Survey and Arboriculture Impact Assessment (AIA) has been carried out by Tyler Grange LLP and submitted in support of this planning application. The survey comprises two small areas of existing trees on the eastern and north-western sides of the application site. The results show that the majority of trees are in groups of younger age and lower quality, with some more-mature individual trees interspersed.
- 6.14 The proposed development would result in the loss of three small groups of trees (Groups G3, G4 and G5 as defined on the Tree Constraints Plan within the AIA) as well as a modest area of Group G2 on the north-eastern side of the application site.
- 6.15 The AIA includes a proposed Landscape Strategy (plan reference: 1586/P89), which identifies areas of new planting which would compensate the proposed loss of trees and shrubs. If the Council is supportive of the proposed landscape strategy, it is intended that detail planting proposals would be submitted either during the planning application period or in line with a planning condition (subject to planning permission being granted).

Landscape and Visual Impact Assessment

- 6.16 A Landscape and Visual Impact Assessment has been carried out by Tyler Grange LLP and submitted in support of this application. Whilst the proposed building is only two storeys in height, the proposals form part of a programme of redevelopment across the brewery, which is likely to change the overall appearance of the brewery complex in the long term. As such, it is considered important to consider the cumulative impacts of development even where less prominent buildings are proposed.
- 6.17 The LVIA clearly demonstrates through its assessment of the theoretical zone of visibility and associated photomontages that the building will comfortably fit within the scale and existing visual parameters of the brewery sites and will not result in a prominent or incongruous feature within the surrounding landscape.
- 6.18 As a result of the proposed tree losses, the LVIA includes a proposed landscaping scheme as mitigation. The landscape proposals focus on planting new trees to the brewery's northern

and eastern boundary and the inclusion of additional understory planting to help enhance biodiversity. This approach is considered to be consistent with Policy NE1.

Ecology

6.19 Tyler Grange LLP has prepared the enclosed Ecology Appraisal in support of this planning application, which included a site visit carried out on 4 August 2021. The appraisal concludes that there is limited opportunity for protected or priority species on site as the site comprises predominantly hardstanding, road and yard space with areas of poor semi-improved grassland, tall ruderal vegetation, improved grassland, semi-mature trees and tree belt, and introduced shrubs.

6.20 In consideration of potential protected species, the report can be summarised as follows:

- **Amphibians** – there are no water bodies found on site or within 500 m of the site boundary. Limited isolated terrestrial habitat is available: great crested newts are not considered to be using the site.
- **Bats** – trees on site are young with negligible bat roost potential. The site offers little in terms of foraging and commuting habitat. Previous activity surveys of the site show limited usage of the site by bats. Further surveys are not necessary.
- **Reptiles** – poor semi-improved grassland/tall ruderal vegetation provides suitable habitat; however reptiles have not been found on the site during previous surveys and there are no records of reptile species within 1 km of the site boundary. Full reptile surveys are not required.
- **Nesting birds** – there is woody vegetation and trees on site that may provide nesting bird habitat. Tree felling should be completed outside of the bird nesting season.

6.21 Considering the feedback above, it is considered that the application site is of low ecological value and, in the absence of any protected or priority species, the development would not result in any harm to habitat or biodiversity. It is therefore considered that the proposals are consistent with Policy NE1.

Lighting

6.22 A Lighting Assessment has been carried out by Redmore Environmental and submitted in support of this planning application. The purpose of the assessment is to ensure that the

proposed lighting does not result in levels of light spill that may adversely effect amenity in the local area or cause harm to biodiversity.

- 6.23 The lighting scheme comprises lamps mounted at regular intervals around the proposed Perfect Draught building, positioned just above ground floor level. All lamps will be directed downwards and will be operated on a dusk-till-dawn basis throughout the year to ensure safe working practises are carried out.
- 6.24 The assessment recommends that lighting should be positioned so as not to directly illuminate the tree corridor on the eastern side of the application site and, where necessary, the use of cowls or hoods on the lamps would further reduce the risk of light spill.
- 6.25 Overall, the proposed lighting is considered to be appropriate for this major industrial site and measures will be taken to ensure that light spill is minimised as far as possible whilst maintaining a safe working environment for all employees and visitors to the site.

Flood Risk

- 6.26 The site lies within an area identified as 'low risk from sea flooding' as defined by the Natural Resources Wales Flood Map. The land is not identified as being within either flood zone C1 or C2 as defined on the Welsh Government's Development Advice Maps.
- 6.27 As noted above, the application predominantly comprises existing hardstanding and limited additional areas of hard surfacing are proposed. A drainage strategy will be submitted with the planning application confirming how the development will connect into the brewery's existing drainage network, ensuring that the risk of flood is not increased elsewhere.

Ground Conditions

- 6.28 An intrusive site investigation has been carried out to confirm whether any harmful levels of contamination are present and also to confirm the type of foundations that would be required for the building. The initial results received have not raised any concerns and further analysis including soil sampling results will be provided during the planning application process. Historically, numerous site investigations have been carried out across the brewery site and adjoining land, and no significant sources of contamination have been identified.

7 Conclusion

- 7.1 This Planning Statement has been prepared on behalf of Budweiser Brewing Group Limited in support of a planning application for the erection of a new building to produce Perfect Draught products and associated works including the erection of 8 Bright Beers Tanks, associated control building and reconfiguration of parking and hardstanding areas.
- 7.2 The proposal has been designed to enable a new production line to operate from the brewery site and a suite of technical documents has been prepared and submitted in support of the proposed development and each of these inputs concludes that the proposed development and any relevant mitigation is compliant in terms of both the Council's Local Plan policies as well as other legislative or regulatory standards that apply.
- 7.3 This proposal is considered to accord with the relevant aspects of local and national planning policy and there are no other material considerations that would prevent planning permission from being granted. As such, the proposal is considered to accord with the development plan, and it is considered that planning permission should be granted without delay in accordance with national policy.