

2 February 2024

Planning Department
Hertsmere Borough Council
Civic Offices
Elstree Way
Borehamwood
Herts
WD6 1WA

Dear Sir / Madam,

Bio Products Laboratory, Dagger Lane, Elstree, Radlett, Borehamwood, WD6 3BX

Town and Country Planning

Full Planning Application for Erection of new Temporary Contractor Welfare Facility and Relocation of Cabins

We write on behalf of our client, Kedrion Biopharma, to submit a full planning application for proposed works at Bio Products Laboratory, Dagger Lane, Elstree, Radlett, Borehamwood, WD6 3NX ('the site'). The application has been submitted online via the planning portal (ref. PP-12639466) for the following development:

"Erection of new Temporary Contractor Welfare Facility and relocation of existing cabins."

Application Package

In addition to this Cover Letter, the application pack comprises the following documents:

- Application Form
- Location Plan (ref. 1173-00)1B rev. P01)
- Existing Site Plan – Welfare (ref. 1173-(00)2B rev. P01)
- Proposed Site Plan – Welfare (ref. 1173-(00)3B rev. P01)
- Existing Ground Floor Welfare Cabins (ref. 1173-(10)100B rev. P01)
- Existing Elevations – Welfare (ref. 1173-(11)100B rev. P01)
- Proposed Relocated Welfare Cabins (ref. 1173-(16)100B rev. P01)
- Proposed Ground Floor Welfare (ref. 1173-(16)101B rev. P01)
- Proposed Fire Floor Welfare (ref. 1173-(16)102B rev. P01)
- Proposed Elevations New Welfare Cabin (ref. 1173-(17)100B rev. P01)
- Proposed Elevations Relocated Welfare (ref. 1173-(17)101B rev. P01)
- Proposed Section New Welfare Cabin (ref. 1173-(18)100B rev. P01)
- Design and Access Statement, prepared by Ackroyd Lowrie
- Planning Assessment, included within this letter.

The planning application fee has been paid via the Planning Portal.

Site and Surrounding Context

The site is located within the 35 acre Bio Products Laboratory (BPL) campus, which is used as a mixed industrial (research and other laboratories), offices, and storage space. BPL has been involved in the processing of human plasma since 1954, when it was founded as part of the Lister Institute of Preventative Medicine and is still located at the same site in Elstree as was established in 1902. Over the years the Elstree site has been adapted as a result of technological, commercial, and environmental evolution over the years and plays a key role not only as a large employer within Hertsmere, but also as a global biomedical institution.

The application site is located in the north western corner of the BPL campus with the Hillfield Reservoir to the west, waste water treatment centre to the north, and the wider BPL campus to the east and south. More broadly, the M1 motorway runs to the south of the site, Aldenham Country Park to the north-east, and the centre of Elstree village is located less than 1.5km to the east.

According to the Hertsmere Borough Council's Policies Map (2016), the site is located within the following designations:

- The Green Belt
- Key Green Belt Site

In addition to this, the Site is located adjacent to or near to areas of land that have the following designations:

- Key Green Belt Sites (Infill Envelope)
- Local Nature Reserve to the west
- Local Wildlife Site to the west and east
- Historic Park & Garden to the north and east.

The site is not located within a conservation area, nor are there any statutory or locally listed buildings within the site, nor does the site fall within the setting of any statutory or locally listed buildings.

According to the Environment Agency's Flood Map for Planning, the site is located wholly within Flood Risk Zone 1, therefore is considered to have a 'low' probability of flooding.

Planning History

The site has been subject to numerous planning applications, however the below table outlines the most recent and relevant permissions.

Reference	Description	Date	Decision
23/1697/PD280	Application for Prior Notification of the proposed demolition of 14 cottages	27/12/2023	Approved
23/0475/FUL	Erection of a new two storey plant room to house purified water generation facility with associated works and equipment	11/08/2023	Approved
21/1525/FUL	Installation of substation and secondary Diesel Rotatory Uninterruptible Power Supply (DRUPS) to the new aseptic filling line	03/12/2021	Approved
20/2023/FUL	Construction of single storey extension to existing manufacturing building No 27 with installation of new air handling units on the roof	12/02/2020	Approved
19/2000/FUL	Increase to the cooling tower capacity through the addition and integration of a new cooling tower comprising 2 cells adjacent to the existing 4 cooling tower cells in the plant yard of Building 27	12/02/2020	Approved

17/0384/FUL	Two storey extension to house additional plant equipment and erection of enclosure for chemical storage, dosing pumps, chillers and compressors	15/05/2017	Approved
16/2427/FUL	Erection of 2 new steel water treatment settlement tanks and associated works	13/02/2017	Approved
16/1854/FUL	Erection of first floor extension to house support equipment to the rear of building B27	01/12/2016	Approved
15/1847/FUL	Part demolition and part re-use of an existing temporary office Portocabin and retention of a further single storey Portocabin in an alternative location on the site to facilitate expansion of the car park and allow for an additional 40 car park spaces. (retrospective application)	20/01/2016	Approved
TP/10/0650	Retention of portacabin office for temporary period (renewal of TP/06/1371)	09/11/2010	Approved
TP/06/1371	Retention of portacabin office for temporary period	04/01/2007	Approved

	(renewal of TP/06/1371)		
TP/03/0428	Retention of portacabin for temporary period (renewal of planning permission TP/2000/0141)	25/06/2003	Approved
TP/00/0141	Retention of portacabin office for temporary period (renewal of planning permission TP/98/0414)	05/04/2000	Approved
TP/98/0414	Retention of portacabin office linked to existing portacabin office for a temporary period	03/08/1998	Approved

Proposal

This application seeks permission for development at the existing BPL site for the following works:

- Erection of a new Temporary Contractor Welfare Facility (TCWF);
- Relocation of existing 3no. Shutdown Cabins;
- Repositioning of 2no. cabins to accommodate new layout; and
- Removal of 5no. existing cabins.

The proposed new Temporary Contractor Welfare Facility will be sited adjacent to the existing Contractor Compound. The requirement for the additional TCWF is to support an increase in the number of contractors, as current facilities are at capacity. The proposed TCWF will provide additional office space, toilets, meeting rooms, wet rooms, kitchens, and dining areas.

It is important to note that when the capacity of the TCWF lowers to a sufficient level, the existing cabin will be off hired and removed from the site.

The proposal also seeks to relocate 3no. existing cabins adjacent to the proposed TCWF to be used as Shutdown Cabins for a new team.

Due to the proposed location of the TCWF, 2no. additional standard cabins are to be relocated from their current position to be adjacent to the 3no. relocated Shutdown Cabins, whilst all other redundant cabins in this location are to be removed from site.

Planning Policy Framework

National planning policy is set out in the National Planning Policy Framework (NPPF) (2023) which must be taken into account in preparing development plans and is a material consideration in determining planning applications.

The NPPF is currently under review in order to help support reforms to the planning system being progressed under the Levelling UP and Regeneration Bill. Consultation on the proposed amendments took place in December 2022 to March 2023.

Section 38(6) of the Planning and Compulsory Purchase Act (2004) requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise.

The existing development plan for Hertsmere Borough Council comprises of the following:

- The Hertsmere Core Strategy (2013);
- Site Allocations and Development Management (SAMD) Policies Plan (2016); and
- Policies Map (2016)

The Council carried out Regulation 18 consultation on their new Local Plan in 2021, however following a meeting of the Full Council in April 2022 it was agreed to set aside the Regulation 18 draft Local Plan whilst awaiting clarity from the Government on changes to law or policy affecting the matter. There is currently no timetable for next steps.

The Council has prepared numerous Supplementary Planning Documents (SPDs) to supplement the development plan documents. The following SPDs are of relevance to this site:

- Biodiversity and Trees SPD (2010)
- Parking Standards SPD (2014)
- Planning and Design Guide Part A SPD (2006)
- Planning and Design Guide SPD Part C (2006)
- Revised Draft Planning and Design Guide SPD Part D (2016)

In addition to the above, the Council have prepared a number of draft SPDs. Those listed below are considered most relevant to this site:

- Draft Biodiversity Net Gain SPD (2022)
- Draft Carbon Offsetting SPD (2022)
- Draft Sustainable Transport and Parking Standards SPD (2022)

Planning Assessment

This section considers the core planning considerations in relation to the determination of the application in relation to principle, design, and amenity.

Principle of Development

The site is located within the Green Belt, as identified on the Hertsmere Policy Map (2016). Paragraph 154 of the NPPF states that construction of new buildings should be regarded as inappropriate in the Green Belt unless it falls within any of the outlined exceptions. Paragraph 155 of the NPPF outlines certain other forms of development that would not be inappropriate in the Green Belt provided that they preserve its openness and do not conflict with the purpose of including land within it.

It is identified within the Hertsmere Local Plan that the site is located within a Key Green Belt Site where development within the area of appropriate infilling is not considered inappropriate provided it complies with the criteria of SADM25 including the impact on openness. The area of the application site where the proposed facilities are to be erected/relocated do not fall within the area of appropriate infilling and therefore will not be considered against Policy SADM25 and instead would need to be assessed against policies within the NPPF and Policies CS13 and SADM26 of the Local Plan.

The developments proposed as part of this application would not fall within any of the exceptions to inappropriate development, therefore would, by definition, result in harm towards the openness of the Green Belt and should not be approved unless very special circumstances exist to overcome the harm that would otherwise be caused.

The siting of the proposed development has been carefully considered. It has been found that the proposed Welfare Facility could not be located within the area of appropriate infilling due to existing facilities as well as underground services that would require access; therefore there is insufficient space within the area of appropriate infilling that could accommodate the proposed development. Notwithstanding this, the proposed facility will be sited in the location of 4no. existing storage containers which will be removed from the site rather than an area that is completely void of structures or development. Furthermore, an additional storage container is proposed to be removed as part of the works.

In addition to the above, there is sufficient screening of the proposals from public vantage points and the development would sit within the context of the existing built form of the site to ensure that the development will not have a greater impact on the openness of the Green Belt. Notwithstanding this, very special circumstances would be required to justify the development, which are summarised as follows:

- Development is ancillary to the existing laboratory facility which provides a service that has a global reach.

- Development will assist the growth of a key employer within the borough.
- Overtime, the existing Welfare Facility will be permanently removed from the site reducing the level of built form within the Green Belt.

The proposed development is sited within the existing Bio Products Laboratory facility and will support the further enhancement of the existing industrial employment function of the site in accordance with Policy CS8 of the Core Strategy, which states that the Council will support development proposals in appropriate locations, which attract commercial investment, maintain economic competitiveness, and provide employment opportunities for the community.

The creation of the additional TCWF will provide facilities for an additional 24 people who will be employed within the BPL campus, assisting the existing function and allowing the growth of this key employer within the local area.

Policy SADM26 requires development within the Green Belt to comply with a number of principles. The proposed siting of the development will be viewed in the context of the existing facility and is of a scale that ensures that they are unobtrusive and are not viewed in isolation to ensure that the development does not have a greater impact on the openness or purpose of the Green Belt than the existing development.

Given the above and that there is no harm identified from the proposed development against all other local and national planning policy, it is considered that the above would amount to very special circumstances that would justify the proposed development within this green belt location.

Design

The NPPF states that the Government attaches great importance to the design of the built environment. Policy SADM30 advises that in order to achieve a high-quality design, development must respect, enhance, or improve the visual amenity of the area by virtue of its scale, mass, bulk, height, and urban form.

The proposed new welfare facility is identical to the existing welfare facility on site which is located adjacent to the proposed location of this new development. The proposal will be two storeys in height with an industrial appearance that will be in keeping with its surroundings. The proposed development will not be an incongruous addition to the wider site and will in fact be highly obscured from public vantage points due to the proposed siting of the facility within the Bio Products campus away from the public highway as well as the fact that the building will be located behind the existing facility further obscuring views.

The relocation of the 3no. containers to be used as Shutdown Cabins are to be located adjacent to the proposed TCWF and 2no. further cabins that are existing are merely to be relocated to a nearby location. These cabins will similarly be viewed within the context of the wider BPL campus as well as the Sewage Treatment Works to the north therefore would not harm the overall character or appearance of the wider site.

Impact on Residential Amenity

Policy SADM30 states that new development is not to adversely impact on neighbouring residential amenity in terms of loss of natural light, outlook, or privacy.

Due to the siting of the proposed development within the existing BPL campus, there are no neighbouring properties that would be adversely impacted by the proposed development in terms of light, outlook, or privacy.

In terms of noise, there are no sensitive receptors located nearby which could be adversely affected by the proposed development.

I trust that the above is sufficient information to enable pre-application discussions to be had with Hertsmere Borough Council, and we look forward to receiving confirmation of this. However, should you require anything further, please do not hesitate to contact me.

Yours sincerely



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For and on behalf of Avison Young (UK) Limited