

31 January 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 a new Automation Training Cabin**

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-12739185) for the following development:

*"Erection of new Automation Training Cabin."*

### **Application Package**

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

- Application Form
- Location Plan (ref. 1173-(00)1C rev. P01)
- Existing Site Plan (ref. 1173-(00)2C rev. P01)
- Proposed Site Plan (ref. 1173-(00)3C rev. P01)
- Existing Ground Floor – Automation Cabin (ref. 1173-(10)100C rev. P01)
- Proposed Ground Floor Cabin (ref. 1173-(16)100C rev. P01)
- Roof Plan Cabins (ref. 1173-(16)101C rev. P01)
- Elevations – Automation Cabin (ref. 1173-(17)100C rev. P01)
- Section – Automation Cabin (ref. 1173-(18)100C 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	27/12/2023	Approved

	proposed demolition of 14 cottages		
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,	15/05/2017	Approved

	dosing pumps, chillers and compressors		
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 (renewal of TP/06/1371)	04/01/2007	Approved
TP/03/0428	Retention of portacabin for temporary period	25/06/2003	Approved

	(renewal of planning permission TP/2000/0141)		
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 Automation Cabin

The proposed new Automation Cabin will be sited adjacent to the existing IT cabin and Car Park 3, located centrally within the BPL campus. The requirement for the additional cabin is to allow for increased training for staff.

## 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.

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 'envelope' is not considered inappropriate provided it complies with the criteria of SADM24 including the impact on openness. The proposed location of the Automation Training Cabin will fall within the 'envelope' therefore can be assessed against Policy SADM24. The policy states that development will be permitted provided it:

- a) Would not have a greater impact than the existing development on the openness of the Green Belt and the purpose of including land within it and
- b) Meets the criteria set out below.

All proposals must satisfy the following criteria:

- i) The proposed development should protect, conserve, or enhance any relevant heritage assets in accordance with Policy SADM 29;
- ii) The relocation or introduction of a hard surfaced area such as car park or playground should not have unacceptable impacts;
- iii) The development should not result in a significant increase in motorised traffic; and
- iv) There should no significant adverse impact on:
  - a. Designated open space and sports and leisure facilities;
  - b. Wildlife sites and ecological network; and
  - c. The amenity of adjacent properties.

The proposed works are in relation to the existing Bio Products Laboratory facility, therefore will support the existing use of the site. The location of the proposed new cabin will be adjacent to an existing building within the facility which will screen the proposal from public vantage points, ensuring that it will not have a greater impact than the existing development on the openness of the Green Belt, therefore will be appropriate in relation to part A of Policy SADM24.

As previously stated, the proposed location for the cabin is not within a conservation area nor are there any statutory or locally listed buildings either on the site or in close proximity. The plot does not fall within an Archaeological site.

The proposed development does not introduce any significant hard surfacing to the area.

The proposed introduction of the Automation Training Cabin will not result in any increase in motorised traffic to the site.

There are no designated open spaces, sports, or leisure facilities adjacent to the Site.

It is acknowledged that to the east of the wider BPL facility is a Local Wildlife Site and to the west is both a Local Nature Reserve and a Local Wildlife Site. Due to the scale and nature of the proposal, the development will not adversely impact upon the amenity of either of these adjacent designations.

The proposed siting of the cabin is within the centre of the BPL facility, therefore will not have any adjacent properties that would be adversely affected by the proposal.

Based on the above, it is clear that the proposed development will meet all of the criteria outlined within Policy SADM24, therefore development is considered acceptable in principle at this location in respect to this policy.

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 cabin will appear commercial in appearance, which due to the siting of the cabin adjacent to existing development, this will be in keeping with its surrounding character. The cabin will also be single storey and be appropriately screened by existing built form, therefore will not appear as an incongruous addition to 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**