

Location: Knebworth Estate
Knebworth Park
Old Knebworth
Knebworth
Hertfordshire
SG3 6PY

Applicant: Mr R George

Proposal: Temporary use of land for film making with associated temporary set and supporting facilities vehicles, access, parking and storage for 23 weeks alongside the temporary removal of part of an existing bund

Ref. No: 21/00290/FP

Officer: Sam Dicocco

Date of expiry of statutory period : 25.03.2021

Submitted Plan Nos

PL-010 rec 18/01/2021; Block plan rec 18/01/2021; Block plan - Set rec 18/01/2021; Site Servicing Plan and Acoustics rec 16/03/2021; Email setting out additional noise and light nuisance information and mitigation rec 16/03/2021; Bund Excavation Detail rec 23/02/2021; Detail Survey 070221/topo rec 23/02/2021; Arboricultural Report S495-J2-IA-1 by John Cromar's rec 23/02/2021; Ecological Overview and Guidance by Calluna Location Services rec 11/03/2021; and Addendum to Ecological Overview and Guidance rec 12/04/2021.

1.0 **Site History**

1.1 4/00132/1 - Relocation of cricket club facilities with two pitches, club house, access road and car parking with associated works. As amended by plan nos. S-01D, S-02A, S-03A, P-10, P-11A, P-12A, P-13A, P-14A, P-15 H9537 01A, 03, 04 and 02C, 0735 1-3 Rev 3 and 0735 1-2 Rev 3 received 22/8/14 and 14/10/14 and 26/11/14 – Conditional Permission 19/12/2014 – Not implemented

2.0 **Representations**

2.1 **Site Notices: 10.02.2021 Expiry: 05.03.2021**
Press Notice: 11.02.2021 Expiry: 06.03.2021

Consultee responses

Hertfordshire County Council as Local Highways Authority – No objection

Historic England – No objection in principle, subject to details of works and restoration

Knebworth Parish Council – No objection

Environmental Health – Further information request 17.02.2021 – No objection subject to conditioning mitigation against noise and light emission, and inclusion of an informative 23.04.2021

Neighbour representations

A neighbour representations have been received from premises adjoining and surrounding the site. Below is a brief summary. All responses have been read in full.

No objection in principle, However, concerns in regard noise impacts from delivery and construction works and long on-site working day proposed. Support the suggestion of a later start in mitigation. Further concerns in respect impact of the works on wildlife, with particular regard to night-time lighting disrupting bats.

3.0 Planning Considerations

3.1 Site and Surroundings

3.1.1 The site lies as shown in the site location plan includes the access road running from the A1(M) junction 7 to the sites of substance including a crew base and a set. Consequently, the site is partially within Stevenage Borough Council, but largely within North Hertfordshire District Councils jurisdiction. The crew base covers approximately 3420sqm (60mx57m) and it located to the south east of an avenue of trees within Knebworth Country Park orienting important views towards Knebworth House. The set would be contained within around 13,056sqm (128mx102m) within the south drive, within Knebworth Country Park.

3.1.2 The site lies within Knebworth Grade II* Registered Park and Garden, the curtilage of Knebworth House Grade II* listed building and its associated curtilage and individually listed buildings within its vicinity, the Green Belt, and the set part of the site lies within Old Knebworth Conservation Area. The sites are currently vacant of any structure or built form of any note. The site contains and is in close proximity to important tree planting within Knebworth Park and Garden. The set and the crew base are located to the south west of Knebworth House. The access identified within the site location plan would run to the north of the Church of St Mary and St Thomas (Grade I) as well as The Barns Restaurant (Grade II).

4.0 Proposal

4.1 The application seeks planning permission for the temporary use of the of land for film making with associated temporary set and supporting facilities vehicles, access, parking and storage for 23 weeks, as well as the temporary, partial removal of an existing bund.

- 4.1.2 The access would run from junction 7 of the A1(M), following an established track south and west running alongside several listed buildings and through the registered park and garden.
- 4.1.3 The crew base would require the laying of aluminium panels, alongside a marquee measuring approximately 40m x 12m x 4.5m, as well as 4 x containers and ancillary equipment.
- 4.1.4 The set would contain hard surfacing and temporary structures presenting as dwellings set in between the trees on the south drive. The set would contain an avenue of hard surfacing running in a south east – south west direction (aligned to the direction of trees planted on the south drive) and a relatively central T junction hosting hard surfacing running in a north east direction. The set would contain 5 structures presenting as dwellings, as well as 4 structures presenting as detached garages and associated driveway surfacing. The set structures and surfacing would be laid out to complement and fit within and around the existing planting.

4.2 Key Issues

Preliminary Matters

- 4.2.1 The application is primarily for the use of the land, however, the structures, while temporary, represent operational development for which planning permission is required. Furthermore, the removal of the bund, while temporary, is an engineering operation for which planning permission is required. The following assessment must be framed by the temporary nature of the use and structures, and the steps which could be secured to remediate any potential impact.

Principle and policy context

- 4.2.2 Policy 19 of the Saved Local Plan restricts development proposals which would destroy or result in any loss of value of Historic Parks and Gardens. Policy 2 of the SLP aims to keep Green Belt land open in character, and states that, with the exception of very special circumstances, permission will only be granted for appropriate development in the Green Belt. These policies, while ‘time-expired’, are consistent with the aims of the NPPF, and therefore are not considered out-of-date.
- 4.2.3 The aims of policy 2 of the SLP are followed through in policy SP5 of the Emerging Local Plan. Policies SP13, HE1 and HE4 of the ELP protect heritage assets including those of archaeological interest. Registered Parks and Gardens, Listed Buildings and Conservation Areas are covered under the Heritage Assets umbrella. Policy NE1 and NEX aim to protect landscapes and biodiversity/ecological value respectively. These policies are not time-expired, however, are also not formally adopted to the local development framework by reason of the ongoing examination (see section 2.4 of this report).

The plan is considered at an advanced stage of preparation, and the policies have a high degree of consistency with the NPPF. The policies quoted, in the context of this site, are not subject to significant unresolved objections. It is noted that policy SP5 of the ELP is subject to unresolved objections in respect to release of Green Belt for development purposes, but these objections are not relevant to the context of this application. Consequently, in line with paragraph 48 of the NPPF, significant weight is afforded to these policies in the context of this application.

- 4.2.4 Perhaps unsurprisingly, there is no specific policy within the local plans documents which promote the use of land as temporary film sets and their associated operational development.
- 4.2.5 As stated above in paragraph 4.3.3, the local plan policies regarding heritage assets and the Green Belt share a high degree of consistency with sections 16 and 13 of the National Planning Policy Framework respectively. The NPPF supports prosperous the building of strong, competitive economies within section 6.
- 4.2.6 Overall, taking the basket of policies identified above as most important in the determination of this application, the development plan is considered present and up-to-date in the context of this application. Consequently, the framework for decision making in this case is that the development should be approved without delay if it accords with the basket of policies described above in line with paragraph 11c) of the NPPF. Even if this were not the case, the most important policies in the assessment of this proposal protect areas or assets of particular importance, so even if paragraph 11d) were triggered, where the application of Green Belt or heritage asset policies provide a clear reason for refusal, the development should be refused (limb i.).

Heritage

- 4.2.7 The site lies within, and in the curtilage and setting of, several important heritage assets. Those of greatest importance in the context of this application are –
- Knebworth Registered Park and Garden
 - Knebworth House (Grade II*)
 - Old Knebworth Conservation Area
 - Jubilee Lodges, Walls and Gate Posts (Grade II)
 - Knebworth War Memorial (Grade II)
 - Church of St Mary and St Thomas (Grade I) (transport impacts (noise and vibration) only)
 - The Barns Restaurant (Grade II)
- 4.2.8 The applicant has provided an assessment of the significance of the site as a heritage asset through selective extracts of the listing of the Knebworth Park and Garden. Given the temporary nature of the proposed development, this is considered, on balance, proportionate.

- 4.2.9 The south drive, and lane of trees planted in a southwest to northeast direction towards Knebworth House are important aspects of Knebworth Park and Garden, the Conservation Area, as well as the setting of several listed buildings. The absence of built form and formal surfacing along the south drive, or Jubilee Avenue, positively contributes to the significance of the combined heritage assets. The south drive is noted within the Old Knebworth Conservation Area Character Appraisal as a key view.
- 4.2.10 It is clear that, for the period the works are underway and in location, the contribution of the site as a designated heritage asset will be diminished. To consider otherwise would be tantamount to agreeing the extent of the external structures and formal surfacing would be appropriate and preserve heritage assets if permanent.
- 4.2.11 There is potential for permanent harm to the site's significance as a heritage asset. The formal planting of the trees along the south drive, as well as the formal planting of trees framing views from the south west of Knebworth House towards it, contribute highly in terms of historic significance to the site as a heritage asset. Harm to these trees as a result of the physical works required in the establishing of the temporary use as well as the decommissioning of the works would result in permanent harm.
- 4.2.12 A report has been submitted assessing the potential impact of the proposed temporary structures and works on the trees within the south drive. The report includes a detailed arboricultural method statement has been provided which includes the preparation, construction, and restoration phases. The method statement has been read and absorbed, and includes monthly site visits by the arboriculturist as well as unannounced site visits. Reports will be provided to the Local Planning Authority within 5 days of the site visit. I am confident that the arboriculturist will provide full and accurate reports which will be reviewed and questioned if necessary by the relevant officer appointed by the Council.
- 4.2.13 The bund for temporary removal is a relatively modern feature. There is no planning record, however, this is not surprising given the ambiguity around engineering operations and planning permission at the time it was established. It was created as an outdoor fencing area. Consequently, the temporary removal of the modern bund material to the natural ground level will not harm any features of archaeological interest. The partial removal of this modern landscape feature will cause minor harm through its partial nature.
- 4.2.14 It is considered that the proposed development would have some short-term impact on the significance of the site as a heritage asset. Whilst no long-term harm would result, as a consequence of conditioning the implementation of the arboricultural method statement which supplements this application, the short-term harm cannot be ignored as a result of its temporary nature. The harm can be weighed in light of the absence of long-term harm, and as such, the harm is considered at the lower end of less than substantial.

4.2.15 The benefits of the proposed development are laid out within the *Scheme benefits*: section paragraph 5.13-5.16 and *Very special circumstances* section paragraphs 7.5-7.22. In sum, the proposed use will have significant economic benefits, immediately for the Knebworth House Education and Preservation Trust (KHEPT) which funds repairs and preservation of Knebworth House and the designated park and garden which surrounds it, as well as associated economic benefits for the surrounding area. The use will necessitate the use of local services and facilities, including hotels, transport/taxi firms, shops, cafes and restaurants due to the number of employees and works involved in the temporary use. There will be some local employment of runners, cleaners, security, on-site support, etc. Further benefits involved include increased publicity for the site, and some weight to be attached to sections of the NPPF involving promoting competitive economies, including rural diversification, and government publications supporting the film industry.

4.2.16 It is considered that the less than substantial, short term, harm likely resultant from this proposal would be outweighed by the public benefits including the economic benefits of use of local services and facilities and employment, as well as increased publicity for Knebworth House, and direct funding resultant to be put towards the continued preservation of Knebworth House and Knebworth Park and Gardens.

Green Belt

4.2.17 Much with the above assessment of heritage matters, it must be acknowledged that the proposal involves the construction and erection of structures, engineering operations and uncommon uses, albeit, temporally short-term.

4.2.18 The proposed works would not in any part be considered as an exemption under paragraph 145 of the NPPF. The material change of use of the land may be considered appropriate so long as it preserves the openness and purposes of the Green Belt designation.

4.2.19 The fundamental aim of the Green Belt is to prevent urban sprawl by keeping land permanently open, with its essential characteristics being its openness and permanence.

4.2.20 The land is currently open, in that it is absent any built form or any material use. The proposal would introduce built form, and an operational, material use, with associated traffic, parking, equipment and movements/action within the site. Consequently, it cannot be said that the temporary works and use would preserve the openness of the Green Belt. The proposal would also conflict with purpose c) and d) of paragraph 134 of the NPPF, in that it would encroach on open countryside and not preserve the setting of Old Knebworth.

- 4.2.21 Even though the impacts on spatial (activity) and visual (built form) openness of the Green Belt and purposes c) and d) of paragraph 134 would be temporary, and not permanent, it must be concluded that the proposal represents an inappropriate form of development in the Green Belt. The harm to the openness and purposes of the Green Belt, alongside any other harm, must be clearly outweighed by other material considerations to benefit from the 'very special circumstances' set out in paragraphs 143 and 144 of the NPPF. Other harm can be identified in the short term less than substantial harm to the setting of heritage assets.
- 4.2.22 The first other consideration is the absence of permanence of harm. Following decommissioning of the works and engineering operations, no harm to the openness or purposes of the Green Belt would persist. The decommissioning can be reasonably conditioned to ensure land is restored to its previous condition.
- 4.2.23 Other material considerations include the economic and environmental benefits of the proposed development, including and most importantly, the historic environment benefit of providing funding for the maintenance and preservation of heritage assets. It is acknowledged that these benefits replicate those used in the public benefits tests in the heritage section of this report. Those benefits now must clearly outweigh the harm from inappropriate development in the Green Belt, as well as harm to the openness and purposes of the Green Belt and the less than substantial harm to heritage assets.
- 4.2.24 Paragraph 144 of the NPPF makes clear that any harm to the Green Belt must be afforded substantial weight. Consequently, I assign significant weight to harm to the Green Belt as identified above, through inappropriateness, as well as harm to openness and specified purposes. Equally, I afford substantial weight to the remediation strategy to be agreed by condition to return the site to its original condition following the cessation of the temporary use. I further afford substantial weight to the economic and environmental long-term benefits explored earlier within this report. These long-term benefits are afforded substantial weight by reason of the absence of long-term harm resultant from the development. These benefits, combined, clearly outweigh the harm identified through inappropriate development in the Green Belt and any other harm.

Amenity

- 4.2.25 The principle concern in respect to neighbouring amenity is noise and disturbance. It is considered that the access strategy provided sufficiently mitigates potential harm or nuisance to the occupiers of adjoining premises in respect to traffic. Following a response to a request for further information, the Environmental Health Officer is satisfied that, subject to a condition and informative, the proposal will not result in material harm to the living conditions of the occupiers of adjoining premises. Mitigation includes acoustic barriers, no use of loudhailer during filming at night, community engagement and offers of hotel rooms or black-outs to those residents most likely to be affected by lighting on the one night of filming.

Flooding

- 4.2.26 There are no concerns in respect to flooding. No additional flood risk would result from the proposed works, and there would be no flood risk to the proposed temporary use.

Biodiversity and ecology

- 4.2.27 Some minor works are proposed to the trees on site, and the development will result in some disturbance during construction and filming. An ecological survey and guidance document has been provided by the applicant in support of the application. Within it are a set of recommendations to follow to best protect existing ecological value within the site. It is noted within the document that some trees (No.1, 22 and 26) have the potential for bat roosting, and that further assessment is required. This can be conditioned on any approval. A part of this condition will require considered set construction procedure and method to ensure minimal disturbance of the functionality of the linear trees as a navigating aid for commuting and transiting bats to foraging areas. Whilst some removal of deadwood and trimming is required on tree No.1, no works are required which would disturb trees 22 and 26, which are not part of the avenue on the south drive.
- 4.2.28 Subject to several conditions to secure the recommendations within the ecological survey and guidance, the proposed development would not harm biodiversity or ecology present within the site.

Contamination

- 4.2.29 The Environmental Health team at North Hertfordshire District Council have noted the potential for asbestos within the bund to be temporarily removed. That being said, it is within the remit of the Health and Safety Executive to enforce against any inappropriate or unqualified removal of such substances. In line with paragraph 183 of the NPPF *"The focus of planning policies and decisions should be on whether proposed development is an acceptable use of land, rather than the control of processes or emissions (where these are subject to separate pollution control regimes)"*. The land use is considered acceptable, and the control of this potential issue is already regulated for outside of the planning system.

The planning balance

- 4.2.30 Pursuant to the above discussion, subject to conditions, it is considered that the proposed development accords with the provisions of the development plan. The economic and environmental benefits of the proposed development would outweigh the temporary harm to the environment (historic and Green Belt).

4.3 **Conclusion**

- 4.3.1 The proposed development would accord with the policy provisions of the local development plan. The harm to the historic environment and Green Belt would be temporary, and outweighed by the benefits attributed to the proposal. Consequently, the proposed development should be **GRANTED** subject to conditions.

5.0 **Legal Implications**

- 5.1 In making decisions on applications submitted under the Town and Country Planning legislation, the Council is required to have regard to the provisions of the development plan and to any other material considerations. The decision must be in accordance with the plan unless the material considerations indicate otherwise. Where the decision is to refuse or restrictive conditions are attached, the applicant has a right of appeal against the decision.

6.0 **Recommendation**

- 6.1 That planning permission be **GRANTED** subject to the following conditions:

1. The development hereby permitted shall be begun before the expiration of 3 years from the date of this permission. Written notification of the commencement of the works and temporary use shall be submitted to and approved in writing by the Local Planning Authority.

Reason: To comply with the provisions of Section 91 of the Town and Country Planning Act 1990 as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

2. The development hereby permitted shall be carried out wholly in accordance with the details specified in the application and supporting approved documents and plans listed above, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the development is carried out in accordance with details which form the basis of this grant of permission.

3. The building(s) hereby permitted shall be removed from the site and the land restored to its former condition on or before the cessation of 23-weeks from the written notification of commencement submitted in line with Condition 1 of this permission, unless otherwise agreed in writing with the Local Planning Authority.

Reason: The building(s) does/do not represent an appropriate form of permanent development and permission has been granted for a temporary period solely because of the special circumstances advanced in support of the application.

4. The use hereby permitted shall be discontinued and the land restored to its former condition on or before the cessation of a 23-week period starting with the written notification of commencement submitted in line with Condition 1 of this permission unless otherwise agreed in writing by the Local Planning Authority.

Reason: The use does not represent an appropriate form of permanent development and permission has been granted for a temporary period solely because of the special circumstances advanced in support of the application.

5. Only one temporary permission for a period of 23-weeks from the date of notification in line with Condition 1 of this decision notice is approved by way of this notice. No further notification under Condition 1 can be submitted following the submission of the commencement of any further temporary works or use of the land for film making.

Reason: To ensure the permission for temporary use is, as applied, a one-shot permission, and cannot be used in perpetuity for different temporary film-making use on the site.

6. Prior to the strike phase of the temporary sets and facilities, a scheme and/or method of remediation shall be submitted to and approved in writing by the Local Planning Authority. The scheme/method submitted shall provide details of method and time required for de-construction, remediation seeding, include imagery of the site pre-construction, and any other details which may be considered required by the applicant or Local Planning Authority based on the circumstances at the time. The scheme/method of remediation agreed pursuant to this condition shall be followed on site.

Reason: To ensure a satisfactory method of remediation is agreed and no long-term heritage impacts are sustained.

7. Upon completion of the strike works agreed within the scheme/method of remediation submitted and approved in writing by the Local Planning Authority pursuant to Condition 6 of this permission, imagery of the site shall be submitted to and approved in writing by the Local Planning Authority. If the Local Planning Authority are not satisfied with the remediation, a further scheme/method of remediation shall be submitted in line with Condition 6 of this permission.

Reason: To ensure no long-term impacts are resultant from the proposed development.

8. The development hereby approved shall be carried out in line with the contents of the 'Report regarding the impact on trees of proposals for development at Knebworth Park, Old Knebworth, Knebworth, SG3 6PY' by John Cromar's Arboricultural Company Ltd referenced S495-J2-IA-1. Section 7 - Arboricultural method statement shall be followed in its entirety with reference to 8 - Plans, and inspection reports shall be sent to planning.control@north-herts.gov.uk with the referencing this condition and application reference number, unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure the protection and preservation of important trees.

9. Prior to any works required to trees No.1, 22 and 26 as identified within the 'Ecological Overview and Guidance: Proposed Filming, Knebworth House Estate' by Calluna Location Services, a further assessment report as to the potential of bat roosting taking place within these species shall be undertaken and a report submitted to and approved in writing by the Local Planning Authority. Mitigation measures should be submitted with the further assessment report if required. The works to these trees shall only commence upon approval of the results of the report and/or mitigation measures is received in writing from the Local Planning Authority.

Reason: To ensure the no harm is resultant from the works on protected species.

10. The temporary use and associated works hereby approved shall be carried out in accordance with the protocols recommended within the Addendum to Ecological Overview submitted to and received by the Local Planning Authority on 12 April 2021 unless otherwise approved in writing by the Local Planning Authority.

Reason: To ensure best efforts are undertaken to conserve the navigational aid of the linear trees for a protected species during the temporary works and use.

11. Routes to and around the site from existing hard surfaced tracks, as well as the Tech Pad, should be established through the deployment of interlocking ground protection panels. Panels should be cleaned before transport to site to guard against the introduction of unwanted seed sources or potential plant disease.

Reason: To prevent sward damage, surface rutting and soil compaction effects in the interests of preserving ecological value of existing open fields.

12. Pop up bins will be used on Set and at Tech Pad for the storage of refuse and removed for off-site disposal on a daily basis. To deter casual littering, smokers should have access to on Set sand buckets for disposal of cigarette butts. The area of filming activity should be litter picked on a daily basis to prevent detritus becoming lost amongst soil or vegetation. An additional forensic litter pick should also be undertaken on completion of site occupancy.

Reason: To ensure the site remains clean throughout the temporary works and use and is left tidy following the temporary permission is implemented in the interest of preserving the ecological interest of the site.

13. All fuel consuming equipment will have bunded tanks to prevent leakage. Emergency spills kits should travel with all equipment. Any required refuelling should be strictly controlled and undertaken by competent individuals only. Delegation of refuelling responsibilities to a limited number of named personnel and the availability of appropriate spills kits has shown itself to be an effective system for ensuring that site contamination is avoided. Spills kits should consist of absorbent pads and sheets, gloves, disposal bags and shovel.

Reason: To prevent any potential spillages/contamination through the temporary works and use in order to conserve ecological value in the site.

14. The Production will have access to the services of an experienced ecologist through all phases of site occupancy to provide guidance on the implementation of the above controls and protocols and to advise on best practise regarding avoiding or minimising any unforeseen negative impacts. The details of the appointed ecologist will be provided to the Local Planning Authority within 15 working days of the commencement of the development hereby approved, and regular monthly reports shall be provided in writing to planning.control@north-herts.gov.uk referencing this condition and application reference number.

On completion of work the location should be left in good order to the satisfaction of the landowner following a post filming site inspection 'walk through.', with a final report provided to the Local Planning Authority.

Reason: To ensure ecological measures are undertaken on-site throughout the development in the interest or preserving the ecological value of the site.

15. The temporary use and works hereby approved must be undertaken in accordance with the information and mitigation measures provided within email dated 16 March 2021 and in accordance with the Site Servicing Plan + Acoustics block plan appended to that email and received on the same date unless otherwise agreed in writing by the Local Planning Authority.

Reason: To ensure best mitigation measures are taken to prevent any material harm to the living conditions of the occupiers of adjoining premises.

Proactive Statement:

Planning permission has been granted for this proposal. Discussion with the applicant to seek an acceptable solution was not necessary in this instance. The Council has therefore acted proactively in line with the requirements of the Framework (paragraph 38) and in accordance with the Town and Country Planning (Development Management Procedure) (England) Order 2015.

Informative/s:

1. Cut material produced as a result of necessary tree management works should be reserved until completion of Production site occupancy. Material should then be positioned close to the base of trees from which material originated. This will contribute to wider ecological continuity by maintaining an association between the living tree and allied (fallen) deadwood elements. This need only apply to significant branch elements: small twigs etc can be considered outside the scope of this recommendation and can be disposed of at point of cutting.
2. Vehicles and plant should avoid traversing ground close to relic hedge features other than via temporary roadways constructed from ground protection panels. Crew should be made aware of any nesting activity and proximity of footfall adjusted accordingly.

3. Should there be a requirement to create a mist effect for camera, this will be achieved using lay-flat hoses or handheld Artems, subject to the following protocols.

Lay-flat perforated plastic hoses are used to deliver middle distance mist effects. A mineral oil is heated in a generation unit via a coil, resulting in the creation of a 'mist' vapour. The vapour is blown via a fan down a manually perforated tube allowing the 'mist' to escape at a number of points. All generation units feeding the lay-flat tubes should be homed on drip drays containing absorbent wadding to prevent ground spillage of the vapour producing liquid. Drip trays should also be deployed underneath lay flats where they cross significant local topography depressions: where there is a natural sump, the generated vapour can occasionally condense and leak from the perforations as a liquid. Use of spill mat lined drip trays are effective in preventing any spillage under these circumstances. The liquid itself is mineral based and non-toxic. Its use has previously been consented for film work on a number of SSSIs. In line with established Environment Agency guidance, no mist generators or hoses will be deployed within 5m of wetland habitat. This definition will encompass the drainage ditch and Juncus stand.

Close up mist effects will be achieved through the use of hand held Artems (canister fuelled smoke generator units) allowing fine tuning of required coverage, responding to changes in wind direction and strength. These self-contained units are carried by SFX technicians within the filming area as required.

4. During the construction phase the guidance in BS5228-1:2009 (Code of Practice for noise Control on construction and open sites) should be adhered to.