



Planning Statement

Former Big Cat Sanctuary, Codicote Road, Codicote, Welwyn, AL6 9TU

Demolition of all existing buildings and structures on site and the redevelopment of the site to provide no. 109 residential units with access, parking, hard and soft landscaping, public open space and associated works.

31 July 2026

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1.1. Introduction

- 1.2. This Planning Statement has been prepared by Howarth Homes Ltd in support of an application for full planning permission for the redevelopment of the Site.
- 1.3. The Site is located within the administrative areas of both North Hertfordshire District Council and Welwyn Hatfield Borough Council. This Planning Statement has therefore been prepared to support the parallel planning applications submitted to both local planning authorities.
- 1.4. This Statement provides an assessment of the Proposed Development against the relevant national and local planning policy framework and other material considerations. It sets out the planning justification for the proposed development and explains why planning permission should be granted.
- 1.5. Full planning permission is sought for:
"Demolition of all existing buildings and structures on site and the redevelopment of the site to provide 109 residential units with access, parking, hard and soft landscaping, public open space and associated works."

Application Documents

- 1.6. This Statement should be read together with the submitted plans and drawings and the following supporting documentation:
 - Completed Planning Application forms, and Certificate B
 - Covering Letter; prepared by Howarth Homes
 - Completed Community Infrastructure Levy (for Welwyn Hatfield); prepared by Howarth Homes
 - Design and Access Statement; prepared by OSP
 - Existing and Proposed Drawings, Elevations and Sections; prepared by OSP
 - Preliminary Ecological Assessment (PEA); prepared by Greengage

- Biodiversity Net Gain Metric; prepared by Greengage
- Statement of Community Involvement; prepared by Terrapin
- Landscape and Visual Appraisal; prepared by Arthian
- Flood Risk Assessment and Drainage Strategy; prepared by ht-engineering
- Transport Assessment and Travel Plan; prepared by RGP
- Air Quality Assessment; prepared by Arthian
- Cultural Heritage Desk-based Assessment; prepared by Arthian
- Energy Statement; prepared by XC02
- Sustainability Statement; prepared by XC02
- Noise Impact Assessment; prepared by Arthian
- Heritage Statement; prepared by Asset Heritage
- Arboricultural Impact Assessment; prepared by DAA

Cross-Boundary Application Arrangement

- 1.7. As a result of the application site extending across the administrative boundaries of North Hertfordshire District Council and Welwyn Hatfield Borough Council, separate planning applications have been submitted to each Local Planning Authority to enable the comprehensive redevelopment of the site.
- 1.8. The proposals comprise a single integrated development and have therefore been assessed as one scheme within the supporting technical documentation.
- 1.9. Nevertheless, of the proposed 109 dwellings, 105 dwellings are located within the North Hertfordshire District Council administrative area, with the remaining 4 dwellings located within the Welwyn Hatfield Borough Council administrative area. Similarly, of the proposed 233 car parking spaces, 219 spaces are located within North Hertfordshire, and 14 spaces are located within Welwyn Hatfield.
- 1.10. Whilst separate planning applications are required for administrative purposes, the development has been designed and assessed as a single

coherent scheme. Accordingly, the determination of the applications should have regard to the overall planning benefits, infrastructure provision, access arrangements, landscaping strategy, open space provision and environmental effects of the development as a whole.

2.1. Executive Summary

- 2.2. This Planning Statement has been prepared in support of a full planning application for the redevelopment of the former Big Cat Sanctuary and Farm Shop site at Codicote Road, comprising the demolition of the existing buildings and structures and the construction of 109 new dwellings, together with access, parking, landscaping, public open space, drainage infrastructure and associated works. The proposal has been informed by a comprehensive suite of technical assessments which demonstrate that the site can be developed without giving rise to unacceptable planning, environmental or technical impacts.
- 2.3. The application site occupies a sustainable location in close proximity to both Welwyn and Codicote and comprises previously developed land within the Green Belt. Having regard to the provisions of the National Planning Policy Framework (2024), the site falls within the definition of Grey Belt land. Whilst parts of the site comprise previously developed land, the key consideration is that the site does not strongly contribute to Green Belt purposes (a), (b) or (d), as defined by paragraph 143 of the Framework
- 2.4. . Both North Hertfordshire and Welwyn Hatfield currently experience significant housing land supply shortfalls and are unable to demonstrate a five-year housing land supply. The delivery of new homes therefore attracts substantial weight in favour of the proposal.
- 2.5. The proposed development would provide 109 new homes, including 55 affordable dwellings equating to approximately 50% affordable housing provision. This level of affordable housing significantly exceeds local policy requirements and accords with the Government's objective of securing meaningful public benefits through the redevelopment of Grey Belt land. The scheme would make an important contribution towards addressing both market and affordable housing needs across the housing market area.
- 2.6. The proposed layout has been informed by a landscape-led design approach which responds positively to the site's topography, existing trees, boundary

vegetation and surrounding context. Areas of open space and green infrastructure are retained and enhanced, creating a high-quality residential environment whilst maintaining ecological connectivity and strengthening the landscape framework of the site. The development provides an attractive and sustainable place to live, consistent with national and local design objectives.

- 2.7. The supporting technical evidence demonstrates that the development can be accommodated safely in transport terms. The Transport Assessment concludes that the local highway network is capable of accommodating the proposed development without resulting in severe impacts on highway safety or operation. The scheme benefits from access to walking, cycling and public transport opportunities and is supported by a Travel Plan designed to encourage sustainable travel choices.
- 2.8. Flood risk and drainage matters have been comprehensively assessed through a site-specific Flood Risk Assessment and Drainage Strategy. Detailed assessment confirms that fluvial flood risk to the site is low, that development has been directed away from areas of surface water flood risk and that a SuDS-led drainage strategy can be delivered without increasing flood risk elsewhere. The proposed development can therefore be developed safely throughout its lifetime, including with appropriate allowances for climate change.
- 2.9. Ecological assessments identify no overriding constraints to development and demonstrate that important habitat features can be retained and enhanced. The proposals will deliver biodiversity enhancements and a measurable 10.10% Biodiversity Net Gain, supported by long-term management arrangements. Similarly, heritage assessments conclude that any impact upon the setting of the nearby Grade II listed building would amount to less than substantial harm at the lower end of the spectrum, which is clearly outweighed by the significant public benefits arising from the delivery of housing, affordable housing, environmental improvements and regeneration of the site.

- 2.10. The development has been designed to achieve high standards of sustainability. Enhanced fabric performance, renewable energy generation, electric vehicle charging, water efficiency measures, biodiversity enhancements and sustainable drainage infrastructure collectively contribute towards a low-carbon and environmentally responsible development. The scheme is capable of delivering a significant reduction in regulated carbon emissions and exceeds local policy requirements for water efficiency.
- 2.11. Overall, the proposal represents a sustainable form of development which delivers substantial social, economic and environmental benefits. The scheme provides much-needed housing and affordable housing on previously developed Grey Belt land in a sustainable location, whilst technical assessments confirm that no unacceptable impacts would arise. Any limited policy conflict associated with the site's Green Belt designation is significantly outweighed by the considerable public benefits of the proposal. Accordingly, the development accords with the objectives of the National Planning Policy Framework when read as a whole and planning permission should be granted.

3.1. Site and Surroundings

- 3.2. This section explains the current site and surrounding context and includes relevant planning designations.

The Site

- 3.3. The application site is 4.09ha in size and comprises a detached residential dwelling ("the Bungalow"), a barn complex currently used as a farm shop and storage, and a collection of outbuildings, enclosures and associated hardstanding formerly associated with the operation of the Big Cat Sanctuary. Following the cessation of the sanctuary use, parts of the site have become underutilised and are now occupied by paddocks and a limited range of agricultural and animal-related activities.
- 3.4. The Site is located on the northern side of Codicote Road, approximately midway between the villages of Codicote and Welwyn. Codicote village centre lies approximately 1km to the north, whilst Welwyn village centre is approximately 0.9km to the south.
- 3.5. The Site extends across the administrative boundaries of North Hertfordshire District Council and Welwyn Hatfield Borough Council, although the majority of the land falls within North Hertfordshire. Vehicular access is currently taken from Codicote Road via an existing centrally positioned access point.
- 3.6. The Site lies within the Metropolitan Green Belt and comprises previously developed land. Existing development includes the bungalow, farm shop, associated structures and areas of hardstanding. The Site does not contain any designated heritage assets.
- 3.7. The Site is characterised by a pronounced change in levels, rising from south to north by approximately 18 metres across the site. The Site Location Plan is shown below.

Site Location Plan



The Surroundings

- 3.8. The immediate surroundings comprise woodland to the north, open agricultural land to the west, and the River Mimram corridor to the south, beyond which residential development is located. Residential properties are also present on the eastern side of Codicote Road. Dansbury Park lies to the south-east of the Site. The nearest designated heritage asset is 44 Codicote Road (Spinners Cottage), a Grade II listed building located adjacent to the Site.
- 3.9. The wider area is characterised by a mixture of open countryside, recreational land and development associated with Codicote and Welwyn. Singlers Marsh lies to the south-west and provides a substantial area of publicly accessible open space. The surrounding network of public rights of

way, including footpaths and bridleways, provides recreational opportunities and connections to nearby settlements and the wider countryside.

4.1. Planning History

- 4.2. This section summarises the planning history which was obtained from both LPAs, however, note that no search results were found in the WelHat online planning register. Therefore, all of the following results were taken from North Herts online planning register.
- 4.3. On February 1981, conditional permission was granted for 'Use of part of existing building as shop for retail sale of produce from the holding, animal foodstuffs, bedding, accessories and other food items' under planning ref: 81/00213/1.
- 4.4. In December 1981, planning application 81/01457/1 was refused for the Erection of detached bungalow with hardstanding.
- 4.5. On 13 October 1977, conditional permission was granted for the 'Conversion of existing building to house small wild cats' under planning reference: 77/00856/1.

5.1. Consultation and Community Engagement

- 5.2. This section summarises the outcome of the pre-application process and consultation process, and how the proposal has responded to the comments and feedback received. This section should be read alongside the Statement of Community Involvement (SCI), prepared by Terrapin, submitted with the application.
- 5.3. The Localism Act 2011 and the National Planning Policy Framework (2024) encourage early engagement with local communities, stakeholders and local planning authorities. The NPPF recognises that meaningful pre-application engagement can improve the quality of development proposals and assist in resolving issues at an early stage.
- 5.4. In preparing the proposals, the Applicant has undertaken pre-application engagement with both local planning authorities and carried out a programme of community consultation. The outcome of this engagement is summarised below and should be read alongside the accompanying Statement of Community Involvement.

Pre-application Consultations

- 5.5. Prior to the commencement of the public consultation programme, the Applicant and project team undertook pre-application discussions with both North Hertfordshire District Council and Welwyn Hatfield Borough Council.
- 5.6. A pre-application meeting was held with North Hertfordshire District Council on 23 June 2026, and a further meeting was held with Welwyn Hatfield Borough Council on 19 June 2026. On 30 June 2026, the applicant also presented the scheme at the Welwyn Parish Council Meeting.
- 5.7. Whilst no formal written responses were issued following these discussions, both meetings provided a valuable opportunity to present the emerging proposals and obtain officer feedback on the key principles of development.
- 5.8. Matters discussed included:
- The principle of residential development on the site;

- The proposed site layout and design approach;
 - The scale and density of development;
 - Affordable housing provision;
 - Access, movement and connectivity considerations;
 - Environmental and landscape matters; and
 - The proposed Planning Performance Agreement (PPA) process and programme.
- 5.9. The discussions were constructive and assisted in shaping the evolution of the proposals prior to submission, including refinements to the proposed layout and distribution of development across the site. Matters raised through the discussions have been considered as part of the preparation of the application and supporting technical evidence.

Public Consultations

- 5.10. The Applicant has actively engaged with and encouraged feedback from local residents, businesses and community stakeholders throughout the public consultation process, using multiple channels to receive detailed quantitative and qualitative feedback, including:
- Public consultation including a dedicated website and newsletter
 - Public drop-in exhibitions on Wednesday 3rd June 2026, 4pm-7pm, and Saturday 6th June 2026, 10am-1pm.
 - Online surveys hosted on the dedicated consultation website
- 5.11. In total:
- 494 newsletters were issued;
 - 333 website visitors;
 - 49 exhibition attendees;
 - 44 feedback forms received;
 - more than 380 people engaged
- 5.12. Feedback received during consultation focused primarily on highway impacts, drainage, infrastructure capacity and environmental considerations. The Applicant reviewed this feedback alongside the ongoing

technical workstreams and, in response, progressed the proposals as a full planning application supported by detailed technical assessments. The consultation process assisted in refining the scheme and informing the application now submitted.

6.1. Development Proposals

- 6.2. This section outlines the principal components of the Proposed Development and should be read alongside the Design and Access Statement and accompanying technical assessments submitted in support of the application.

The Proposed Development

- 6.3. Full Planning Permission is being sought for
“Demolition of all existing buildings and structures on site and the redevelopment of the site to provide no. 109 residential units with access, parking, hard and soft landscaping, public open space and associated works.”

Residential Accommodation

- 6.4. The proposed development seeks to provide 109 residential units comprising predominantly 2-3 bed houses, with a smaller number of 4-beds and flatted apartments.
- 6.5. A summary of the proposed accommodation schedule is provided below:

House Type	No. Units	Area (sqm)	Percentage (%)
1 Bed Apt (M4(3))	10	597.4	9.2
2 Bed House	44	3,580.90	40.4
3 Bed House	49	4,692.40	44.9
4 Bed House	6	654.9	5.5
Total	109	9525.6	100
Parking	Spaces		
Car Parking	233		
Cycle Parking	208		

- 6.6. The scheme includes 55 affordable homes, representing 50% of the total number of dwellings proposed. Affordable housing is distributed throughout the development and integrated with the market housing.

- 6.7. An area of public open space is proposed within the north-western part of the site, reflecting the site's topography and landscape constraints whilst providing recreational and ecological benefits.
- 6.8. A total of 233 car parking spaces are proposed, comprising 198 resident spaces, 25 visitor spaces and 10 accessible parking spaces associated with the M4(3) wheelchair-accessible dwellings.
- 6.9. In addition, 208 cycle parking spaces are proposed, comprising 198 standard cycle parking spaces and 10 additional cycle parking spaces associated with the wheelchair accessible apartments.
- 6.10. The proposed site plan is illustrated below:

Proposed Site Plan



7.1. Planning Policy Framework

- 7.2. This Section outlines the relevant national, regional and local planning policy and guidance documents against which the Proposed Development should be assessed, and the key planning considerations.
- 7.3. Section 38(6) of the Planning & Compulsory Purchase Act 2004 requires that proposals be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.4. Accordingly, for the purposes of the Proposed Development, the relevant statutory development plans comprise the North Hertfordshire Local Plan, adopted in 2022, and Welwyn Hatfield Local Plan, adopted in 2023.
- 7.5. Although not forming part of the statutory Development Plan, the following documents are considered important material considerations:
- National Planning Policy Framework ('NPPF') (2024)
 - National Planning Practice Guidance ('NPPG');
 - Supplementary Planning Guidances
 - Sustainability Supplementary Planning Documents
- 7.6. In addition, decisions must accord with relevant legislation. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 ('the Conservation Areas Act 1990') sets out that local planning authorities should pay special regard to the desirability of preserving a listed building or its setting or any features of historic or architectural interest which it possesses when considering applications.

National Planning Policy Framework (NPPF) (December 2024)

- 7.7. The National Planning Policy Framework (NPPF) sets out the Government's planning policies for England and provides a material consideration in planning decisions. It establishes a framework within which locally prepared plans can be produced, ensuring that they reflect the needs and priorities of

their communities, whilst contributing to the achievement of sustainable development.

- 7.8. At the heart of the NPPF is the presumption in favour of sustainable development (Paragraph 7).
- 7.9. Paragraph 8 identifies three overarching objectives of sustainable development: economic, social and environmental. These objectives are mutually supportive and underpin the policies of the Framework.
- 7.10. The NPPF places significant weight on boosting the supply of homes (Chapter 5) and supporting economic growth.
- 7.11. Chapter 13 of the NPPF confirms that the Government attaches great importance to Green Belt.
- 7.12. Paragraph 143 identifies five purposes of the Green Belt:
- a) To check the unrestricted sprawl of large built-up areas;
 - b) To prevent neighbouring towns merging into one another;
 - c) To assist in safeguarding the countryside from encroachment;
 - d) To preserve the setting and special character of historic towns; and
 - e) To assist in urban regeneration by encouraging the recycling of previously developed land.
- 7.13. The 2024 iteration of the Framework introduces the concept of “Grey Belt”. This is defined as:
- “Land within the Green Belt comprising previously developed land and/or land that does not strongly contribute to purposes (a), (b), or (d) of Green Belt designation (as set out in Paragraph 143), excluding land where other protective designations (as listed in Footnote 7) provide a strong reason for refusing development.”*
- 7.14. Paragraphs 155 and 156 of the updated Framework set out how development on Grey Belt sites may be considered more favourably, recognising that such land may have a reduced contribution to Green Belt purposes and may be suitable for redevelopment, subject to other policy considerations.

The current National Planning Policy Framework is the version published on 12 December 2024, which applies with immediate effect to decision-making. Transitional arrangements allowed certain emerging Local Plans to continue to be prepared under the previous (December 2023) Framework until 12 March 2025. Accordingly, the 2024 Framework, including the introduction of Grey Belt policy, now carries full weight as national planning policy, subject to the statutory primacy of the development plan.

- 7.15. At the time of submission, the Government is consulting on further revisions to national planning policy with an anticipated adopted scheduled in August. Whilst these proposed changes are not yet adopted and attract limited weight, any material policy changes introduced during determination of the application, can be addressed through a short planning update note.

Planning Practice Guidance (PPG) (March 2014 and updated regularly since)

- 7.16. The PPG sets out guidance on how planning policy should be interpreted and applied, particularly in relation to the National Planning Policy Framework (NPPF).

North Hertfordshire Local Plan (2022)

- 7.17. The North Hertfordshire Local Plan (2022) provides the statutory planning framework for development within the district. It seeks to deliver sustainable growth through the provision of housing, employment and supporting infrastructure whilst protecting the district's environmental, landscape and heritage assets.

- 7.18. Relevant policies are considered in detail throughout this Statement where they relate to the specific planning issues raised by the Proposed Development.

Welwyn Hatfield Local Plan (2023)

- 7.19. The Welwyn Hatfield Local Plan, adopted in October 2023, provides the statutory planning framework for development within the Borough. The Plan

seeks to deliver sustainable growth through the provision of new homes, employment opportunities and supporting infrastructure, whilst maintaining the Borough's distinctive Garden City heritage and environmental assets.

- 7.20. A key objective of the Plan is the delivery of approximately 15,200 homes over the plan period. Growth is focused primarily within and adjoining Welwyn Garden City and Hatfield, alongside development within villages and other sustainable locations. The Plan promotes high-quality and sustainable development, supported by appropriate infrastructure, whilst seeking to protect and enhance the Green Belt, landscape character, heritage assets, biodiversity and green infrastructure network.

Emerging Plans

- 7.21. North Hertfordshire Council and Welwyn Hatfield Borough Council are both preparing New Local Plans. However, both documents remain at an early stage of preparation and therefore attract only limited weight in decision-making at the present time.

Neighbourhood Plans

- 7.22. The Codicote Neighbourhood Plan (2025) and Welwyn Parish Neighbourhood Development Plan (2026) form part of the Development Plan and are material considerations in the determination of the application. Although neither plan allocates sites for housing development, the relevance of their policies is considered, where appropriate, within the assessment contained in this Statement.

8.1. Key Planning Considerations

- 8.2. This section of the Statement appraises the Proposed Development against the principle of development and land use policy considerations.

Principle of Development

- 8.3. The principle consideration is that the site is located within the Green Belt. First, it is worth noting that both North Herts and WelHat Local Plans pre-date the publication of the NPPF 2024, where the concept of “Grey Belt” was introduced and sets out a revised approach to development within the Green Belt (paragraphs 155 and 156).
- 8.4. It should also be noted that neither Council benefits from a five-year supply of housing, with North Herts being able to show 2.6 years and Welwyn Hatfield being able to show 2.5 years¹ worth of supply.
- 8.5. As neither authority can demonstrate a five-year housing land supply, the presumption in favour of sustainable development is engaged. In accordance with paragraph 11 of the Framework, substantial weight should therefore be afforded to the delivery of new housing, particularly where proposals accord with the objectives of national policy.
- 8.6. Notwithstanding the above, it is prudent to consider the site under paragraph 155 of the Framework, which deals with ‘Grey Belt’. An assessment against the definition of Grey Belt and the requirements of paragraphs 155 and 156 is set out below.

Grey Belt Definition and Applicability

- 8.7. For the purposes of plan-making and decision-taking, ‘Grey Belt’ is defined as land within the Green Belt comprising previously developed land and/or land which does not strongly contribute to Green Belt purposes (a), (b) or (d)

¹ North Herts Five-Year Housing Land Supply Update November 2025 and Welwyn Hatfield Borough Council Annual Monitoring Report 2023/24

set out in paragraph 143 of the NPPF. It excludes land where policies relating to assets identified in footnote 7 provide a strong reason for refusal.

- 8.8. Parts of the application site clearly fall within the definition of previously developed land, whilst other areas comprise ancillary open land associated with the historic use of the site. However, irrespective of its status as previously developed land, the site does not strongly contribute to Green Belt purposes (a), (b) or (d) and therefore falls within the Grey Belt definition.

Assessment Against Green Belt Purposes

- 8.9. **a) To check the unrestricted sprawl of large built-up areas**

The site does not adjoin a large built-up area and is physically separate from the nearest significant urban area. Development of the site would not result in unrestricted urban sprawl nor materially alter the existing pattern of development. The site therefore makes only a limited contribution to this Green Belt purpose.

- 8.10. **b) To prevent neighbouring towns merging into one another**

Purpose (b) relates specifically to preventing neighbouring towns from merging into one another. Neither Welwyn nor Codicote are towns and therefore the site cannot reasonably be regarded as making a strong contribution to this purpose. Furthermore, the development would not result in the coalescence of settlements or materially reduce the perceived separation between Welwyn and Codicote.

- 8.11. **d) To preserve the setting and special character of historic towns**

The site is not located adjacent to a historic town and its development would not affect the setting or special character of any historic settlement. The site therefore makes only a limited contribution to this Green Belt purpose.

- 8.12. Given the above, the site:

- Comprises previously developed land; and
- Does not strongly contribute to Green Belt purposes (a), (b) or (d).

- 8.13. Accordingly, it clearly falls within the definition of Grey Belt, satisfying the first policy test.

Compliance with NPPF Paragraphs 155 and 156

- 8.14. The proposed development is also consistent with the requirements of paragraphs 155 and 156 of the NPPF:

- There is a clear and demonstrable need for new housing within the relevant authority areas;
- The site is located in a sustainable location, with connections to Codicote, Welwyn and wider services; and
- The scheme can deliver a policy-compliant level of affordable housing (50%).

- 8.15. Collectively, these factors provide strong policy support for the redevelopment of the site.

- 8.16. Notwithstanding its Grey Belt status, the site remains designated Green Belt and has therefore been assessed against paragraph 155 of the NPPF.

- 8.17. **155(a): Utilisation of Grey Belt land**

The proposal represents the effective use of Grey Belt land and would not fundamentally undermine, either individually or cumulatively, the purposes or overall integrity of the wider Green Belt.

This criterion is satisfied.

- 8.18. **155(b): Demonstrable unmet need for housing**

North Hertfordshire and Welwyn Hatfield are currently unable to demonstrate a five-year housing land supply and is estimated to have approximately a 2.6 and 2.5-year supply, respectively. This position clearly indicates a significant and persistent shortfall in housing delivery, directly engaging the provisions of paragraph 155(b). There is therefore a strong and demonstrable need for the type of residential development proposed.

This criterion is satisfied.

8.19. **155(c): Sustainable location**

The site is sustainably located, with:

- Pedestrian and cycle connections to Codicote and Welwyn via Codicote Road and quieter routes such as Fulling Mill Lane and local public rights of way;
- Access to the National Cycle Network;
- Bus stops adjacent to the site providing regular services; and
- Welwyn North railway station accessible by cycle, offering frequent services to London and Cambridge.

The site is therefore well-connected by a range of sustainable transport modes and represents a sustainable location in accordance with paragraph 155(c). The proposal also accords with paragraphs 110 and 116 of the Framework, which seek to ensure developments provide safe and suitable access, promote sustainable transport choices and do not result in severe impacts on the highway network.

This criterion is satisfied.

Principle of Residential Development

- 8.20. The site lies within the Green Belt where local plan policies seek to restrict inappropriate development. However, national policy (as set out in the NPPF) is a key material consideration and, in this case, provides a more up-to-date framework for assessing development on Green Belt land.
- 8.21. The proposal results in the loss of a single dwellinghouse but delivers a net increase of 108 dwellings and therefore makes a substantial positive contribution to housing supply.
- 8.22. In addition, the proposal would contribute towards identified housing needs within the Borough, to which significant weight should be attached. As such, to the extent that any conflict with the development plan arises, this is outweighed by material considerations, including national policy support and housing delivery benefits.

9.1. Housing Types and Mix

- 9.2. This section assesses the design of the Proposed Development in relation to housing types, and mix including affordable housing provision. It should be read in conjunction with the Design and Access Statement prepared by OSP.

Policy Context

- 9.3. National planning policy seeks to significantly boost the supply of homes and requires developments to provide an appropriate mix of housing types, sizes and tenures that respond to identified needs. Particular emphasis is placed on the delivery of affordable housing, accessible and adaptable homes, and the creation of mixed and balanced communities.
- 9.4. For qualifying Green Belt developments, the NPPF's 'Golden Rules' seek the delivery of at least 50% affordable housing, unless this would render development unviable. This is intended to ensure that development delivers clear and meaningful public benefits.
- 9.5. North Hertfordshire Local Plan Policies HS2, HS3 and HS5 require major residential developments to:
- Provide an appropriate mix of dwelling sizes and types;
 - Deliver policy-compliant affordable housing;
 - Provide accessible and adaptable homes; and
 - Respond to identified local housing needs.
- 9.6. Welwyn Hatfield Local Plan Policy SP7 seeks a broad range of housing types, sizes and tenures, including affordable housing and accessible homes, whilst Policy D1 requires dwellings to achieve high standards of design and residential quality, including compliance with nationally described space standard.

Housing Types and Mix - Assessment

- 9.7. The proposed development will deliver 109 dwellings comprising a broad mix of dwelling sizes, tenures and house types. The scheme provides 54 market homes (49.5%), 39 affordable rented homes (35.8%) and 16 shared ownership homes (14.7%), resulting in an overall affordable housing

provision of 50% (55 dwellings). This significantly exceeds the affordable housing requirements of both local planning authorities and accords with the enhanced affordable housing expectations set out in national policy for Green Belt development.

- 9.8. In terms of dwelling size, the scheme comprises 10 one-bedroom apartments (9.2%), 44 two-bedroom dwellings (40.4%), 49 three-bedroom dwellings (45.0%) and 6 four-bedroom dwellings (5.5%). The mix is weighted towards two and three-bedroom homes, reflecting identified needs for smaller family housing, whilst also incorporating a range of accommodation suitable for first-time buyers, growing families, downsizers and households requiring affordable housing. All dwellings meet or exceed the Nationally Described Space Standards (NDSS), ensuring a high standard of internal accommodation and supporting the delivery of sustainable, high-quality homes.
- 9.9. The affordable housing offer includes 39 affordable rented dwellings comprising 10 one-bedroom wheelchair-accessible apartments, 16 two-bedroom houses and 13 three-bedroom houses, together with 16 shared ownership homes comprising 14 two-bedroom houses and 2 three-bedroom houses. The tenure split equates to approximately 71% affordable rent and 29% shared ownership, broadly aligning with policy objectives to prioritise affordable rented accommodation whilst maintaining opportunities for intermediate home ownership.
- 9.10. Whilst a Registered Provider has not yet been identified, the Applicant has extensive experience delivering affordable housing through partnerships with Registered Providers. The affordable housing is considered fully deliverable and will be secured through the Section 106 Agreement.
- 9.11. The development also incorporates 10 M4(3) wheelchair user dwellings, contributing towards identified specialist housing needs. Overall, the proposed housing mix provides a diverse range of dwelling sizes, tenures and accessibility standards that responds positively to identified needs across both local authority areas. The scheme delivers substantial affordable

housing provision, a balanced tenure mix, accessible and adaptable homes and dwellings which meet nationally recognised space standards. Accordingly, the proposal is considered to accord with the objectives of the NPPF, together with North Hertfordshire Local Plan Policies HS2, HS3 and HS5 and Welwyn Hatfield Local Plan Policy SP7.

10.1. Design

- 10.2. This section assesses the design of the Proposed Development in relation to layout, scale, massing, architecture, appearance and landscaping. It should be read in conjunction with the Design and Access Statement prepared by OSP.

Design – Policy Context

- 10.3. Section 12 of the NPPF places good design at the heart of sustainable development, confirming that it is fundamental to creating high-quality places and making development acceptable to communities (paragraph 131).
- 10.4. Paragraph 135 states that planning decisions should ensure development:
- functions well and adds to the overall quality of an area over its lifetime;
 - is visually attractive through appropriate architecture, layout and landscaping;
 - is sympathetic to local character and history;
 - establishes a strong sense of place;
 - makes effective use of land; and
 - creates safe and accessible environments.
- 10.5. Section 12 of the NPPF places good design at the heart of sustainable development and recognises that the creation of high-quality places is fundamental to achieving sustainable communities.
- 10.6. Paragraph 135 requires development to function well, be visually attractive, respond positively to local character, establish a strong sense of place, make effective use of land and create safe, accessible and inclusive environments. Paragraph 137 further emphasises the importance of considering design throughout the evolution of a proposal.

- 10.7. North Hertfordshire Local Plan Policy D1 and Welwyn Hatfield Local Plan Policy SP9 require development to respond positively to local context, deliver high-quality design, provide attractive and accessible environments, incorporate green infrastructure and landscaping, and create sustainable places that function effectively over the long term.

Design – Assessment

- 10.8. The proposed development has been informed by a detailed assessment of the site's opportunities and constraints, including its topography, existing trees and hedgerows, the adjoining Grade II listed building at 44 Codicote Road, surrounding residential properties, and the site's relationship with the wider landscape. The scheme adopts a landscape-led design approach which retains and incorporates the site's key natural features into the development framework, whilst redeveloping a previously developed and neglected former big cat sanctuary site as a coherent residential neighbourhood.
- 10.9. The layout has evolved through an iterative design process and is structured around a hierarchy of streets, open spaces and green corridors. Development parcels are arranged to respond to the site's sloping topography, whilst retaining significant perimeter planting and woodland features. Homes are positioned to overlook streets and areas of public open space, creating active frontages and natural surveillance throughout the development. The layout also maintains a landscaped setting around the adjacent Grade II listed building and incorporates appropriate separation distances to neighbouring dwellings.
- 10.10. The development therefore provides a legible, attractive and well-connected layout that will function effectively over its lifetime and contribute positively to the character and quality of the area.

Connectivity and Accessibility – Assessment

- 10.11. The development promotes sustainable movements and provides open spaces, public rights of way and the surrounding area. The proposals provide

connections to existing footways along Codicote Road and improve opportunities for walking and cycling to nearby facilities in Welwyn and Codicote. The site also benefits from access to existing public transport services located adjacent to the site frontage.

- 10.12. The street hierarchy prioritises pedestrian movement, promotes lower vehicle speeds and provides safe and accessible routes throughout the development, creating a permeable and legible environment for future residents.

Density and Efficient Use of Land – Assessment

- 10.13. The development will provide 109 dwellings on a site of approximately 4.09 hectares, equating to a density of approximately 26.6 dwellings per hectare. This represents a relatively modest density which reflects the edge-of-settlement location, the site's landscape sensitivity, extensive green infrastructure provision, retention of existing trees and hedgerows, and its proximity to established residential development. The density allows for the efficient use of land while avoiding overdevelopment.
- 10.14. The proposed density strikes an appropriate balance between maximising housing delivery and respecting local character. It enables the delivery of a significant number of new homes, including 50% affordable housing, whilst maintaining substantial areas of open space, ecological buffers, SuDS infrastructure and landscape planting.

Scale and Appearance - Assessment

- 10.15. The scale of development has been carefully considered in response to the surrounding context and the site's topography. The scheme is predominantly two storeys in height, with limited variation where required to respond to level changes and create visual interest. The proposed built form reflects the prevailing scale of surrounding residential development and ensures that the development integrates successfully into its wider setting. The apartment building is located within the lower part of the site and towards the rear of

the site, where the topography assists in integrating the building into its surroundings.

- 10.16. The proposed architecture takes cues from the local vernacular, incorporating a palette of red and yellow brickwork, grey roof tiles and traditional detailing. Variation in dwelling types, materials and building forms creates visual interest whilst maintaining a coherent architectural approach across the site. This will help establish a strong sense of place and create an attractive residential environment with a distinctive identity.

Landscaping - Assessment

- 10.17. A key characteristic of the proposals is the retention and enhancement of the site's existing landscape framework. Significant boundary trees, hedgerows and woodland features are retained and incorporated into the scheme, helping to soften the development edge and maintain continuity with the surrounding landscape. The layout also incorporates new structural planting, areas of open space, children's play provision and sustainable drainage features.
- 10.18. The development creates a strong network of multifunctional green infrastructure which will provide recreational, ecological and visual benefits. The retention of existing vegetation, supplemented by substantial new planting and habitat creation, will contribute towards biodiversity enhancement and improved ecological connectivity across the site. The landscape-led approach also assists in integrating the development into its surroundings and reinforcing local distinctiveness.

Summary

- 10.19. Overall, the proposed development represents a high-quality, landscape-led residential scheme that responds positively to the site's opportunities and constraints. The proposal delivers an appropriate density, attractive built form, extensive green infrastructure, accessible movement network and a high standard of residential accommodation. The scheme will create a

distinctive, safe and sustainable place and is considered to accord with the design objectives of Section 12 of the NPPF, North Hertfordshire Local Plan Policy D1 and Welwyn Hatfield Local Plan Policy SP9.

11.1. Heritage Impact

- 11.2. This section of the Statement considers the planning policies and material considerations associated with the heritage impact of the Proposed Development.
- 11.3. A Heritage Statement has been prepared by Asset Heritage in support of this application.

Legislative Context

- 11.4. Section 66 of the 1990 Planning (Listed Buildings and Conservation Areas) Act 1990 provides that decision makers are required to have “special regard” to the desirability of preserving listed buildings and their settings.

Policy Context

- 11.5. Chapter 16 of the NPPF seeks to conserve and enhance the historic environment. Great weight should be given to the conservation of designated heritage assets and any harm must be clearly and convincingly justified.
- 11.6. Where a proposal would result in less than substantial harm to the significance of a designated heritage asset, paragraph 215 of the NPPF requires that harm to be weighed against the public benefits of the proposal.
- 11.7. North Hertfordshire Local Plan Policy SP13 and Welwyn Hatfield Local Plan Policy SADM15 similarly seek to conserve and, where appropriate, enhance the significance and setting of heritage assets, whilst recognising that proposals must be assessed having regard to their wider planning benefits.

Heritage - Assessment

- 11.8. The Heritage Statement identifies that the proposals principle impact is in relation to 44 Codicote Road (hereafter referred to as ‘Spinners Cottage’), a Grade II listed building.

- 11.9. The application site adjoins Spinners Cottage on three sides and the principal heritage consideration therefore relates to the impact of the development upon the setting of the listed building.
- 11.10. The Heritage Statement notes that the setting of Spinners Cottage has evolved considerably throughout the twentieth century as a result of surrounding development and changes in land use.
- 11.11. The proposed layout has been designed to minimise impacts upon Spinners Cottage by maintaining open space along parts of the Codicote Road frontage, providing landscaped separation and retaining appropriate distances between proposed dwellings and the listed building.
- 11.12. The Heritage Statement concludes that the demolition of the existing buildings would not harm the significance of Spinner Cottage, as these structures do not make a positive contribution to its setting.
- 11.13. Whilst the proposals would introduce a more residential character to parts of the site, the development has been arranged such that the setting and appreciation of Spinner Cottage would be retained.
- 11.14. The Heritage Statement concludes that the proposed development would result in harm to the setting of Spinners Cottage. However, that harm is assessed as falling at the lower end of the spectrum of less than substantial harm and would not prevent the asset from being understood, appreciated or experienced as a designated heritage asset.
- 11.15. In accordance with Section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990, considerable importance and weight has been given to the desirability of preserving the setting of the listed building. Great weight must also be afforded to heritage conservation in accordance with the NPPF.
- 11.16. Against this harm must be weighed the public benefits of the proposal, including:
- Delivery of 109 new homes;
 - Provision of 55 affordable homes;

- Contribution towards housing needs at a time when both authorities are unable to demonstrate a five-year housing land supply;
- Regeneration and redevelopment of a previously developed site;
- Economic benefits arising during construction and occupation; and
- Environmental benefits associated with biodiversity enhancement and sustainable development measures.

11.17. Having regard to the findings of the Heritage Statement, the statutory duty under Section 66(1), the provisions of Chapter 16 of the NPPF and the wider public benefits of the proposal, it is considered that the low level of less than substantial harm is decisively outweighed by the significant social, economic and environmental benefits arising from the development.

12.1. Ecology, Biodiversity and Landscape

- 12.2. This section of the Statement assesses the ecological landscape impact for the Proposed Development against the relevant policy context.

Policy Context

- 12.3. Chapter 15 of the NPPF seeks to conserve and enhance the natural environment. Development should protect valued landscapes, ecological networks and biodiversity assets, whilst securing biodiversity net gain and applying the mitigation hierarchy to avoid unacceptable ecological harm.
- 12.4.** The NPPF affords strong protection to designated landscapes, designated biodiversity sites and irreplaceable habitats. Development should avoid significant harm to these assets and support opportunities for habitat restoration and enhancement.
- 12.5. North Hertfordshire Local Plan Policies SP12 and NE2 and Welwyn Hatfield Local Plan Policy SADM16 similarly seek to protect and enhance landscape character, green infrastructure, biodiversity and ecological networks, whilst requiring appropriate mitigation, long-term management and measurable biodiversity gains.

Ecology and BNG Assessment

- 12.6. A Preliminary Ecological Appraisal has been undertaken in support of the application. The assessment identifies no overriding ecological constraints that would preclude development of the site. The proposals have been designed to retain and enhance key ecological features, including areas of woodland, trees and hedgerows, whilst incorporating new landscape planting and habitat enhancements throughout the site.
- 12.7. A Biodiversity Net Gain Assessment has been undertaken in support of the application. The assessment confirms that the proposed development would deliver a Biodiversity Net Gain of 10.10%, exceeding the statutory requirement for a minimum 10% gain.

- 12.8. Having regard to the submitted ecological and landscape evidence, the proposed development is capable of conserving and enhancing biodiversity interests, maintaining ecological connectivity and complying with the requirements of the NPPF, North Hertfordshire Local Plan Policies SP12 and NE2, and Welwyn Hatfield Local Plan Policy SADM16.

Landscape Assessment

- 12.9. The application is supported by a Landscape and Visual Appraisal ("LVA") prepared by Arthian Ltd. The assessment considers the effects of the proposed development on landscape character, visual amenity and the wider landscape setting through a combination of desk-based analysis, ZTV modelling and field surveys undertaken in May 2026.
- 12.10. The LVA confirms that the site is not located within a National Landscape, National Park or other statutory landscape designation and concludes that the site and surrounding area do not constitute a valued landscape for the purposes of the NPPF.
- 12.11. The proposals have been designed to retain the majority of existing mature boundary vegetation and incorporate substantial new planting, including structural landscaping, native hedgerows, street trees and areas of public open space. These measures assist in integrating the development into its surroundings and strengthening the site's green infrastructure network.
- 12.12. The assessment demonstrates that visibility of the site is generally limited by topography, woodland and existing development. Visual effects are principally confined to Codicote Road, a small number of neighbouring properties and a limited section of Public Footpath Codicote 023. Elsewhere, including Danesbury Park, Footpath Codicote 044, Kimpton Road and St Albans Road, the development would not give rise to material visual effects.
- 12.13. In landscape terms, the LVA concludes that effects on the site itself would be moderate adverse during the early years following construction, reducing over time as landscaping matures. Effects on the wider Danesbury Settled

Slopes and Codicote Bottom Arable Valley Landscape Character Areas are assessed as minor adverse at worst and remain localised.

- 12.14. The LVA concludes that the site has capacity to accommodate the proposed development without giving rise to overriding adverse landscape or visual effects and that the proposals will become increasingly integrated into the landscape as the planting strategy establishes.
- 12.15. The proposed development therefore accords with the objectives of Chapter 15 of the NPPF, North Hertfordshire Local Plan Policies SP12 and NE2, and Welwyn Hatfield Local Plan Policy SADM16 by protecting landscape character, reinforcing green infrastructure and delivering a comprehensive landscape strategy to support the long-term integration of the development within its surroundings.

13.1. Transport

- 13.2. This section of the Statement sets out the approach to the transport strategy including trip generation/highways impacts, car and cycle parking provision and servicing and waste arrangements of the Proposed Development, against policy standards.

Transport - Policy Context

- 13.3. NPPF paragraphs 110, 113 and 116 seek to ensure that development is located and designed to promote sustainable travel, provides appropriate parking provision and would not give rise to severe impacts on the transport network or highway safety.
- 13.4. North Hertfordshire Local Plan Policies SP6, T1 and T2 and Welwyn Hatfield Local Plan Policies SADM2, SADM3 and SADM12 require development to provide safe and suitable access arrangements, promote sustainable travel, accommodate parking demand appropriately and avoid unacceptable impacts on the operation of the highway network.

Highways Assessment

- 13.5. The application is supported by a Transport Assessment prepared by RGP which considers the accessibility of the site, highway conditions, traffic generation, parking provision and servicing arrangements.
- 13.6. The site benefits from an existing access onto Codicote Road (B656), which provides connections to Welwyn, Codicote and the wider highway network.
- 13.7. The Transport Assessment includes a review of highway conditions, traffic flows and personal injury collision records. The assessment concludes that the proposed development can be accommodated safely and would not result in unacceptable impacts on highway safety or the operation of the local highway network.
- 13.8. Accordingly, there are no transport or highway capacity reasons why planning permission should be withheld.

Access Assessment

- 13.9. The proposals include improvements to pedestrian connectivity, including new footways associated with the site access, reinstatement of redundant vehicle crossings and improved crossing opportunities along Codicote Road.
- 13.10. Existing public transport services and pedestrian connections will be complemented by a Travel Plan designed to encourage sustainable travel choices amongst future residents.
- 13.11. Collectively, these measures enhance accessibility and support walking, cycling and public transport use

Car parking Assessment

- 13.12. The development provides 233 car parking spaces comprising 198 allocated spaces, 25 visitor spaces and 10 accessible spaces serving M4(3) dwellings.
- 13.13. The parking strategy has been prepared having regard to the parking standards of both local planning authorities and is considered sufficient to accommodate anticipated resident and visitor demand.
- 13.14. Electric vehicle charging infrastructure will be provided throughout the development

Cycle parking Assessment

- 13.15. A total of 208 cycle parking spaces are proposed. Secure and convenient cycle storage will be provided throughout the development in accordance with adopted standards.
- 13.16. Together with the site's connections to walking routes, public transport and the Travel Plan measures, the cycle parking provision supports opportunities for active and sustainable travel.

Delivery and Servicing Assessment

- 13.17. Swept path analysis demonstrates that refuse, servicing and emergency vehicles can safely access, manoeuvre within and exit the site. Appropriate

turning facilities have been incorporated into the layout and servicing arrangements have been designed in accordance with the requirements of the relevant authorities.

Summary Assessment

- 13.18. The Transport Assessment demonstrates that the proposed development can be accommodated safely on the local highway network and would not result in severe impacts on highway safety or operation..
- 13.19. The scheme provides safe access arrangements, appropriate parking provision, opportunities for walking, cycling and public transport use, and suitable servicing arrangements. The development is therefore considered to accord with the transport objectives of the NPPF and the relevant policies of the North Hertfordshire and Welwyn Hatfield Development Plans.
- 13.20. Accordingly, the development is considered to comply with the objectives of NPPF paragraphs 110, 113 and 116, North Hertfordshire Local Plan Policies SP6, T1 and T2, and Welwyn Hatfield Local Plan Policies SADM2, SADM3 and SADM12. There are therefore no transport or highway-related reasons why planning permission should not be granted.

14.1. Energy and Sustainability

- 14.2. This section of the Statement assesses the proposed energy and sustainability strategy for the Proposed Developments against policy standards.

Policy Context

- 14.3. The NPPF seeks to support the transition to a low-carbon future and requires development to reduce greenhouse gas emissions, incorporate renewable and low-carbon technologies and adapt to the effects of climate change.
- 14.4. North Hertfordshire Local Plan Policies D1 and SP9 and Welwyn Hatfield Local Plan Policy SADM13 require development to minimise energy consumption, maximise opportunities for renewable energy generation, promote sustainable design and construction, and achieve high standards of water efficiency.
- 14.5. The application is supported by an Energy Statement and Sustainability Statement prepared by XCO2, which demonstrate how the proposed development responds to these requirements.
- 14.6. The application is supported by an Energy Statement and Sustainability Statement prepared by XCO2 which demonstrate how the proposed development has been designed to minimise energy consumption, reduce carbon emissions, adapt to climate change and promote sustainable living in accordance with national and local policy objectives. The sustainability strategy has been prepared specifically to address the requirements of both North Hertfordshire District Council and Welwyn Hatfield Borough Council, reflecting the site's cross-boundary location

Energy Assessment

- 14.7. The Energy Statement demonstrates that the scheme has been developed in accordance with the recognised energy hierarchy of:
- Use Less Energy;

- Supply Energy Efficiently; and
 - Use Renewable Energy.
- 14.8. The scheme incorporates a fabric-first approach including enhanced insulation, improved glazing, reduced air permeability, low-energy lighting and mechanical ventilation with heat recovery. These measures reduce energy demand and improve performance beyond minimum Building Regulations requirements.
- 14.9. Renewable energy generation is provided through roof-mounted photovoltaic panels across the development, with approximately 208kWp of installed capacity.
- 14.10. Overall, the submitted Energy Statement demonstrates that the proposals are capable of delivering a reduction in regulated carbon emissions of approximately 25.7% when compared with a compliant Part L 2021 baseline.
- 14.11. In addition to reducing carbon emissions, the development has been designed to respond to the anticipated effects of climate change. Measures including building orientation, glazing design, natural ventilation and overheating mitigation have been incorporated into the design process.
- 14.12. The wider landscape strategy contributes to climate resilience through the retention of mature trees, new planting, public open space and green infrastructure, which assist with urban cooling, biodiversity enhancement and adaptation to future climatic conditions.

Water Efficiency

- 14.13. All dwellings will be designed to achieve water consumption levels below 105 litres per person per day through the use of water-efficient fittings and appliances. This exceeds the requirements of Welwyn Hatfield Local Plan Policy SADM13.
- 14.14. The development also incorporates wider sustainability measures including responsible sourcing of materials, waste reduction initiatives, facilities for recycling and the adoption of low embodied carbon materials where practicable.

Sustainable Transport and Low Emission Travel

- 14.15. The sustainability strategy also supports lower-carbon travel through the provision of cycle parking, electric vehicle charging infrastructure, improved pedestrian connections and a Travel Plan designed to encourage sustainable travel behaviour.

Summary

- 14.16. Overall, the proposed development demonstrates an integrated approach to sustainability. The scheme incorporates enhanced energy efficiency measures, renewable energy generation, water efficiency measures, climate resilience principles, sustainable drainage infrastructure, biodiversity enhancements and sustainable travel initiatives.
- 14.17. Collectively, these measures are expected to deliver a 25.7% reduction in regulated carbon emissions compared with a compliant Building Regulations baseline, whilst creating a resilient and sustainable residential environment. The proposals therefore accord with the sustainability objectives of the NPPF, North Hertfordshire Local Plan Policies D1 and SP9 and Welwyn Hatfield Local Plan Policy SADM13.

15.1. Flooding and Drainage

- 15.2. This section of the Statement outlines the flooding and drainage proposals against the planning policy requirements and standards.

Policy Context

- 15.3. Chapter 14 of the NPPF sets out the sequential approach to planning new development and flood risk. The NPPF seeks to guide development to areas of low flood risk, ideally to Flood Zone 1. Paragraph 173 states that when determining any planning applications, LPAs should ensure that flood risk is not increased elsewhere and where appropriate, applications should be supported by a site-specific flood-risk assessment.
- 15.4. Further, paragraph 175 sets out that major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate.
- 15.5. North Herts Local Plan Policy NE7 seeks to ensure that development is directed away from areas at risk of flooding wherever possible and that flood risk is appropriately managed throughout the lifetime of a development. Proposals in areas of flood risk must be supported by a Flood Risk Assessment and, where relevant, demonstrate compliance with the Sequential and Exception Tests.
- 15.6. Development should be designed to reduce flood risk, avoid increasing flooding elsewhere, and incorporate flood-resistant and resilient design measures. The policy also requires the protection of overland flow routes and functional floodplains, while ensuring that any flood mitigation measures respect and, where possible, enhance environmental, landscape, heritage and recreational interests.
- 15.7. Policy NE8 requires development proposals to incorporate the most appropriate Sustainable Drainage Systems (SuDS) to manage surface water runoff and reduce flood risk. Drainage measures should, where practicable, mimic natural drainage processes and deliver wider benefits, including

enhanced biodiversity, improved water quality and increased amenity value. Proposals are also expected to follow the SuDS hierarchy, prioritising sustainable drainage solutions over conventional drainage approaches where feasible.

- 15.8. Welwyn Hatfield Local Plan Policy SADM14 seeks to ensure that development appropriately manages flood risk and surface water through the use of sustainable drainage and careful site design. Development in areas at risk of flooding must be informed by up-to-date flood risk information and, where required, be supported by a Flood Risk Assessment prepared in accordance with national guidance and the Council's Strategic Flood Risk Assessment. Proposals should protect and enhance existing watercourses, floodplains and overland flow routes, maintain opportunities for natural drainage, and avoid increasing flood risk elsewhere.
- 15.9. Major development and schemes in areas of surface water flood risk are required to incorporate Sustainable Drainage Systems (SuDS) from the earliest stages of design, prioritising multifunctional solutions that improve biodiversity, water quality, visual amenity and flood resilience, while ensuring their long-term maintenance and management.

Flood Assessment

- 15.10. The application is supported by a site-specific Flood Risk Assessment ("FRA") prepared by Hardy Tunstall Engineering Ltd. The FRA assesses flood risk from all potential sources including fluvial, surface water, groundwater, sewer, reservoir and other artificial sources, together with the implications of climate change and the proposed drainage strategy.
- 15.11. The application site extends to approximately 4.04 hectares and comprises a former farm shop, associated buildings, hardstanding areas and open land. Ground levels fall significantly across the site from approximately 85.8m AOD in the north-west to approximately 68.2m AOD along the southern boundary.

- 15.12. Whilst the Environment Agency Flood Map for Planning indicates that a small portion of the southern part of the site lies within Flood Zone 2, the FRA incorporates detailed Environment Agency Product 6 hydraulic model data derived from the 2019 River Mimram model. This modelling demonstrates that fluvial flood extents do not reach the site, including the 1% Annual Exceedance Probability ("AEP") event with the Upper 59% climate change allowance applied. The highest modelled flood level is 67.41m AOD, which remains approximately 0.79 metres below the lowest site level.
- 15.13. The FRA concludes that the Environment Agency Product 6 model data provides the most accurate and up-to-date assessment of fluvial flood risk and demonstrates that the application site is effectively located within Flood Zone 1. Accordingly, fluvial flood risk to the site is considered low and no floodplain compensation measures are required..
- 15.14. The principal flood risk consideration is therefore surface water flooding. The FRA identifies a small area of surface water risk within the south-eastern corner of the site associated with an existing overland flow route from Codicote Road towards Old Nursery Way. Importantly, the proposed development has been designed in direct response to this constraint, with all proposed dwellings located outside the identified surface water flood risk areas and the site layout informed by existing drainage patterns and overland flow routes.
- 15.15. As mitigation, all residential properties will be provided with finished floor levels set at least 600mm above the predicted maximum surface water flood level. The FRA identifies a conservative maximum flood level of 68.750m AOD and confirms a minimum finished floor level of 69.350m AOD across the development. Furthermore, access arrangements and landform proposals have been designed to maintain existing flow routes and avoid any material increase in flood risk elsewhere.
- 15.16. The FRA concludes that the proposed development can be delivered safely for its lifetime, including appropriate climate change allowances, without increasing flood risk elsewhere. The proposals therefore accord with the

objectives of Chapter 14 of the NPPF together with Policies NE7, NE8 and SADM14, which seek to ensure that development appropriately assesses, manages and mitigates flood risk.

Surface Water Drainage and SuDS Assessment

- 15.17. In addition to assessing flood risk, the FRA incorporates a comprehensive drainage strategy founded upon Sustainable Drainage System ("SuDS") principles. The strategy has been developed in accordance with the requirements of the NPPF, North Hertfordshire Local Plan Policy NE8 and Welwyn Hatfield Local Plan Policy SADM14.
- 15.18. The proposed drainage strategy will restrict surface water discharge to the site's greenfield runoff rate (QBar) of 6.8 litres per second. The strategy incorporates attenuation storage and flow controls to ensure that runoff from the developed site is managed sustainably and that peak rates of discharge are reduced compared with existing conditions. The FRA confirms that the proposals will achieve an approximate 64% reduction in runoff rates during extreme storm events.
- 15.19. Hydraulic modelling demonstrates that the drainage network can accommodate the 1 in 100 year rainfall event including a 40% climate change allowance. The FRA confirms that the proposed drainage network will operate without causing flooding during the design event and that sufficient attenuation capacity is available across the site..
- 15.20. The development has been designed to retain the existing direction of overland flows, with exceedance flows continuing to discharge southwards and south-eastwards in accordance with existing site characteristics. The proposals therefore ensure that flood risk is not displaced onto neighbouring land and that the development does not increase flood risk elsewhere.
- 15.21. The proposed drainage approach therefore accords with the objectives of Policy NE8 and Policy SADM14 by incorporating a sustainable drainage

solution that manages runoff effectively, supports climate resilience and contributes to the delivery of a safe and sustainable form of development

Sequential Approach

- 15.22. The proposed residential development constitutes "More Vulnerable" development for the purposes of national flood risk policy. However, the FRA demonstrates that all proposed built development has been located outside areas at risk from fluvial flooding and outside identified areas of surface water flood risk. The development layout has therefore been informed by a sequential approach at the site level, directing residential development towards the parts of the site at lowest risk from flooding.
- 15.23. Whilst the Flood Map for Planning identifies a limited area of Flood Zone 2 within the site boundary, the Environment Agency Product 6 hydraulic modelling demonstrates that flood levels do not encroach onto the development site. The FRA therefore concludes that fluvial flood risk is low and that the principal flood risk consideration is surface water flooding, which has informed both the layout and drainage design.
- 15.24. The FRA concludes that all built development is located outside areas vulnerable to flooding from all sources, taking account of climate change allowances, and that finished floor levels have been designed with a minimum 600mm freeboard above the maximum predicted flood level. Future occupiers will therefore benefit from safe access and egress and the development will remain safe throughout its lifetime.
- 15.25. In these circumstances, it is considered that the requirements of paragraph 175 of the NPPF are satisfied and that the proposed development has been appropriately designed in response to flood risk constraints. No Exception Test is required.

Summary

- 15.26. The application is supported by a robust Flood Risk Assessment and Drainage Strategy which demonstrates that the site can be developed safely without increasing flood risk elsewhere. Whilst a small part of the site remains identified as Flood Zone 2 on the Flood Map for Planning, detailed Environment Agency hydraulic modelling confirms that fluvial flood extents do not reach the application site, including when appropriate climate change allowances are applied. As such, fluvial flood risk is considered low and the site is effectively within Flood Zone 1.
- 15.27. The principal flood risk consideration relates to a limited area of surface water flood risk within the south-eastern corner of the site. However, the development has been specifically designed to respond to this constraint through the siting of development outside flood risk areas, retention of overland flow paths, provision of minimum finished floor levels of 69.350m AOD and the incorporation of a comprehensive SuDS-led drainage strategy.
- 15.28. The FRA confirms that flood risk from rivers, groundwater, sewers and artificial sources remains low, that discharge rates will be restricted to greenfield runoff rates, and that the development will not increase flood risk either on-site or elsewhere. The proposal is therefore fully consistent with the objectives of Chapter 14 of the NPPF, North Hertfordshire Local Plan Policies NE7 and NE8, and Welwyn Hatfield Local Plan Policy SADM14.

16.1. Other Technical Considerations

- 16.2. In addition to the principal planning matters assessed elsewhere in this Statement, a suite of technical assessments has been undertaken to consider archaeology, noise and air quality. These assessments demonstrate that there are no technical constraints which would preclude the proposed development and that any identified impacts can be appropriately mitigated through planning conditions where necessary.

Archaeology

- 16.3. An archaeological assessment has been undertaken which identifies the site as having moderate archaeological potential. However, no overriding archaeological constraints have been identified which would prevent the redevelopment of the site. Any requirement for archaeological investigation, monitoring or a watching brief can be secured through appropriately worded planning conditions.

Noise

- 16.4. The submitted Noise Impact Assessment concludes that the proposed development is capable of providing acceptable living conditions for future residents. Internal and external amenity areas, including private gardens, can achieve the relevant standards. Where necessary, detailed acoustic mitigation measures can be secured through the detailed design process.

Air Quality

- 16.5. The Air Quality Assessment concludes that the operational impacts of the proposed development would be negligible and not significant. The site is therefore considered suitable for residential use and no specific operational mitigation measures are required.

Summary

- 16.6. The supporting technical evidence demonstrates that there are no archaeological, noise or air quality constraints that would prevent the development of the site. Where necessary, mitigation and monitoring measures can be secured through planning conditions. Accordingly, these matters do not provide a basis upon which planning permission should be refused.

17.1. Planning Obligations and Community Infrastructure Levy (CIL)

- 18.2. This section of the Statement sets out the proposed planning obligations and Community Infrastructure Levy (CIL) payments.
- 18.3. Planning obligations may be secured through a Section 106 Agreement where they are necessary to make development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind to its impacts.
- 18.4. Paragraph 55 of the NPPF supports that planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.
- 18.5. Paragraph 56 of the NPPF sets out that planning conditions should be kept to a minimum and only imposed where they are necessary, relevant to planning and to the development to be permitted, enforceable, precise and reasonable in all other respects. The text goes on to state that agreeing conditions is beneficial to all parties involved in the process and can speed up decision making. Conditions that are required to be discharged before development commences should be avoided unless there is clear justification.

Community Infrastructure Levy (CIL)

- 18.6. North Hertfordshire District Council does not currently operate a Community Infrastructure Levy (CIL) regime. Infrastructure contributions are therefore secured through site-specific Section 106 obligations where justified.
- 18.7. Welwyn Hatfield Borough Council operates a Community Infrastructure Levy (CIL) charging regime. The element of the development falling within the Borough will therefore be liable for any applicable CIL payments in accordance with the adopted Charging Schedule.
- 18.8. Both Councils, together with Hertfordshire County Council where appropriate, may seek planning obligations to mitigate the impacts of

development in accordance with adopted policies, guidance and the statutory tests for planning obligations.

Heads of Terms:

- 18.9. The Applicant is willing to enter into a Section 106 Agreement to secure those planning obligations reasonably required to mitigate the impacts of the development and make it acceptable in planning terms. This may include, where justified, affordable housing, education, transport, healthcare, community infrastructure, open space management and other site-specific measures.
- 18.10. Any planning obligations will be agreed through the planning application process and will be subject to the statutory tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended).

18.1. The Planning Balance

- 18.2. As set out within this Planning Statement, the Applicant considers that the proposed development accords with the objectives of the National Planning Policy Framework when read as a whole and represents a sustainable form of development. The proposal seeks full planning permission for the redevelopment of the former Big Cat Sanctuary and Farm Shop site to provide 109 dwellings, including 55 affordable homes, together with access, parking, landscaping, public open space, biodiversity enhancements, drainage infrastructure and associated works. The scheme will secure the regeneration of an underutilised site and deliver a comprehensive residential development within a sustainable location in close proximity to both Codicote and Welwyn.
- 18.3. The site is located within the Metropolitan Green Belt. However, the evidence presented within this Statement demonstrates that the site falls within the definition of Grey Belt as set out within Annex 2 of the NPPF. Whilst parts of the site comprise previously developed land, the critical consideration is that the site does not strongly contribute to Green Belt purposes (a), (b) or (d) identified in paragraph 143 of the Framework. The proposal also satisfies the tests contained within paragraphs 155 and 156 of the NPPF, including the delivery of housing to meet a demonstrable unmet need in a sustainable location together with the provision of 50% affordable housing. The principle of development therefore benefits from strong support within national planning policy.
- 18.4. In addition, neither North Hertfordshire District Council nor Welwyn Hatfield Borough Council are currently able to demonstrate a five-year housing land supply, with published evidence indicating approximately 2.6 years and 2.5 years of supply respectively. The policies most important for determining the application are therefore out-of-date for the purposes of paragraph 11(d) of the NPPF and the presumption in favour of sustainable development is engaged. In these circumstances, planning permission should be granted

unless any adverse impacts would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole.

- 18.5. It is considered that the proposed development does not give rise to significant policy conflict. Nevertheless, should the Local Planning Authority identify any conflict, such conflict would be limited in nature and should be afforded reduced weight in the context of the acute housing land supply shortfalls affecting both authority areas and the strong national policy support for Grey Belt development. Any identified conflict principally relates to the site's location within the Green Belt and the limited heritage impacts associated with the setting of the Grade II listed Spinners Cottage.
- 18.6. The Green Belt conflict should be afforded limited weight. The site is definitionally Grey Belt, does not strongly contribute to the relevant Green Belt purposes and complies with the requirements of paragraphs 155 and 156 of the Framework. The proposal would not fundamentally undermine the purposes or integrity of the wider Green Belt and would deliver substantial public benefits in accordance with the Government's revised approach to Grey Belt development.
- 18.7. Similarly, the heritage impact should attract limited weight. The submitted Heritage Statement concludes that the proposal would result in less than substantial harm at the lower end of the spectrum to the setting of the Grade II listed Spinners Cottage. The extent of harm has been minimised through the design and layout of the scheme, including the provision of landscaped separation, the retention of open areas and the careful disposition of development around the listed building. In accordance with paragraph 215 of the NPPF, this limited harm must be weighed against the public benefits of the proposal..
- 18.8. Against any limited policy conflict, the proposal would deliver substantial planning benefits. These include:
- The delivery of 109 new dwellings at a time when both local planning authorities are experiencing significant housing land supply shortfalls. This

would make a meaningful contribution towards addressing identified housing needs across the housing market area.

This should be afforded significant positive weight.

- The provision of 55 affordable homes (50%), significantly exceeding local policy requirements and meeting the Government's expectations for residential development on Grey Belt land.

This should be afforded significant positive weight.

- The delivery of housing within a sustainable location, with convenient access to Codicote, Welwyn, public transport services, walking and cycling routes, local facilities and Welwyn North railway station.

This should be afforded significant positive weight.

- The effective redevelopment of Grey Belt land, including the regeneration of an underutilised former Big Cat Sanctuary and Farm Shop site. **This should be afforded significant positive weight.**
- The delivery of a landscape-led development incorporating public open space, structural planting, ecological corridors, retained woodland, tree protection measures and a comprehensive green infrastructure network.

This should be afforded moderate positive weight.

- The retention and enhancement of important ecological features, including woodland, hedgerows and habitat corridors, together with the delivery of biodiversity enhancements and measurable 10.10% Biodiversity Net Gain.

This should be afforded moderate positive weight.

- The creation of a high-quality residential environment, incorporating a well-considered layout, attractive architectural approach, accessible movement network, natural surveillance and a range of dwelling types and tenures.

This should be afforded moderate positive weight.

- The provision of sustainable transport measures, including pedestrian and cycle connectivity improvements, electric vehicle charging infrastructure, cycle parking and Travel Plan measures designed to encourage modal shift.

This should be afforded moderate positive weight.

- A comprehensive flood risk and drainage strategy, including Sustainable Drainage Systems, management of overland flow routes and measures ensuring the development can be delivered safely without increasing flood risk elsewhere.

This should be afforded moderate positive weight.

- The incorporation of energy efficiency and sustainability measures, including a fabric-first approach, rooftop photovoltaic panels, water efficiency measures, climate resilience measures and low-carbon design principles.

This should be afforded moderate positive weight.

- Economic benefits arising from construction activity, future resident expenditure and increased support for local services, facilities and businesses, together with employment opportunities generated during the construction and occupation phases of development.

This should be afforded moderate positive weight.

18.9. The benefits of the proposed development are substantial. The scheme would deliver a significant number of market and affordable homes, make an important contribution towards addressing acute housing needs, redevelop Grey Belt land in a sustainable location, provide biodiversity enhancements, improved landscape quality, sustainable drainage infrastructure, public open space and wider social, economic and environmental benefits.

18.10. Accordingly, even if limited areas of policy conflict were identified, these should be afforded reduced weight having regard to the site's Grey Belt status, the substantial housing and affordable housing benefits arising from the scheme, and the fact that the presumption in favour of sustainable development is engaged. Any adverse impacts would not significantly and demonstrably outweigh the benefits of the proposal when assessed against the policies of the NPPF as a whole.

18.11. The proposed development therefore benefits from the presumption in favour of sustainable development, accords with the objectives of the

National Planning Policy Framework and is supported by material considerations which strongly indicate that planning permission should be granted.

19.1. Summary and Conclusions

- 19.2. The application seeks planning permission for the redevelopment of a previously developed site comprising the former Big Cat Sanctuary and associated buildings for 109 dwellings, including 55 affordable homes, public open space, landscaping and associated infrastructure.
- 19.3. A comprehensive package of technical assessments has been prepared in support of the application. These demonstrate that there are no technical constraints which would prevent the development of the site and that any impacts can be appropriately mitigated through design measures and planning conditions.
- 19.4. The application site is definitionally Grey Belt and the proposed development accords with the requirements of national policy relating to Grey Belt land. In addition, both North Hertfordshire District Council and Welwyn Hatfield Borough Council are currently unable to demonstrate a five-year housing land supply, such that the presumption in favour of sustainable development is engaged. The scheme would deliver substantial benefits, including the delivery of 109 new dwellings, 50% affordable housing, significant biodiversity and landscape enhancements, public open space, sustainable transport measures and the regeneration of an underutilised site in a sustainable location. The only identified harm relates to a limited degree of less than substantial harm to the setting of the nearby Grade II listed building. Applying the statutory heritage balance and paragraph 215 of the Framework, this harm is decisively outweighed by the significant public benefits arising from the proposal. Accordingly, the development benefits from the presumption in favour of sustainable development and planning permission should be granted.
- 19.5. Having regard to the Development Plan as a whole, the National Planning Policy Framework and all other material considerations, the proposed development represents sustainable development and planning permission should therefore be granted.

