



Planning Statement Addendum

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.

28 August 2026

Introduction

Since the application submission (on 31st July 2026), the National Planning Policy Framework (hereafter referred to as the NPPF) has been revised, and republished on 17th August 2026. Consequently, this version replaces the previous NPPF published in December 2024.

The updated NPPF now applies immediately for decision-making purposes and represents a material consideration in the determination of the application.

On that basis, this Planning Statement Addendum intends to address the key planning considerations assessed against the new NPPF. These key planning considerations include:

- Principle of Development Outside Settlements
- Green Belt and Grey Belt Assessment
- Compliance with the Golden Rules
- Flood Risk and Drainage

Principle of Development Outside Settlements

NPPF Policy S3 'Presumption in favour of sustainable development' states that decisions on development proposals should apply a presumption in favour of sustainable development outside settlements assessed against Policy S5 'Principle of development outside settlements'.

Policy S5(1)(j) states that development should be supported where it addresses an evidenced unmet need, including (but not limited to) the provision of housing where the local authority cannot demonstrate a five-year supply of deliverable housing sites, and where the development would be physically well-related to an existing settlement and of a scale capable of being accommodated by available infrastructure.

As set out in the original Planning Statement, both North Hertfordshire and Welwyn Hatfield are currently unable to demonstrate a five-year housing land supply. Published evidence indicates that North Hertfordshire can demonstrate approximately 2.6 years of supply, whilst Welwyn Hatfield can demonstrate approximately 2.5 years. Accordingly, there is a clear and evidenced unmet need for additional housing delivery within both authority areas.

Whilst Policy S5 does not define the term "well-related", the site lies approximately 1km south of Codicote and 0.9km north of Welwyn, placing it in close proximity to both settlements. Given these distances, together with the site's accessibility by walking and cycling, the proposal is considered to be physically well-related to existing settlements.

There are a number of public rights of way in the surrounding area, bus services nearby and Welwyn North railway station is accessible by cycle. The proposal therefore occupies a sustainable location which is physically and functionally related to existing settlements.

The proposal therefore satisfies the new NPPF's requirements of Policy S5(1)(j).

As the site is located within the Green Belt, Policy S5(5) confirms that the development must additionally be considered against Policies GB6, GB7 and GB8 of the Framework.

Green Belt and Grey Belt Assessment

NPPF Policy GB7(g) 'Development which is not inappropriate in the Green Belt' confirms that development is not inappropriate in the Green Belt where:

- the proposal utilises Grey Belt land;
- it would not fundamentally undermine the purposes of the remaining Green Belt;
- there is an evidenced unmet need;
- the site occupies a sustainable location; and
- major housing proposals comply with the Golden Rules.

Before assessing each point in turn, it is worth noting that the five purposes of the Green Belt remain unchanged.

- the proposal utilises Grey Belt land;

Since submission of the application, the Framework has amended the definition of Grey Belt. The previous definition excluded land where other protective designations identified in Footnote 7 provided a strong reason for refusing development. This exclusion has now been removed and Grey Belt is defined as:

For the purposes of plan-making and decision-making, 'grey belt' is defined as land in the Green Belt comprising previously developed land and/or any other land that, in either case, does not strongly contribute to any of purposes (a), (b), or (d) in policy GB2.

The site represents an appropriate and sustainable use of Grey Belt land. Whilst historically occupied by the former Big Cat Sanctuary and Farm Shop, the key consideration is that the site does not strongly contribute to Green Belt purposes (a), (b) or (d). As set out below, the site performs only a limited role in checking unrestricted sprawl, preventing the merging of neighbouring towns, or preserving the setting and special character of historic towns.

- 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. Accordingly, the proposal makes effective use of Grey Belt land whilst delivering the substantial public benefits sought by national planning policy.
- 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.

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.

- it would not fundamentally undermine the purposes of the remaining Green Belt;

The site comprises a former Big Cat Sanctuary, farm shop, bungalow, associated structures and extensive hardstanding. The site therefore comprises previously developed land and does not strongly contribute to Green Belt purposes (a) - (e), as set out in the original planning statement.

- there is an evidenced unmet need;

As set out above, North Hertfordshire and Welwyn Hatfield can only demonstrate approximately 2.6 years and 2.5 years of housing land supply respectively, evidencing a significant shortfall in housing delivery across both authority areas.

In addition to the need for market housing, there is a substantial and evidenced unmet need for affordable housing. The proposed development would deliver 55 affordable homes (50% affordable housing provision) at a time when both authorities face acute affordable housing pressures. Welwyn Hatfield's published evidence¹ identifies an annual affordable housing need of 818 affordable homes per annum, whilst North Hertfordshire's Strategic Housing Market Assessment² identifies a need for approximately 280 affordable homes per annum.

The delivery of 109 homes, including 55 affordable dwellings, would therefore make a meaningful and significant contribution towards meeting identified affordable housing needs, whilst also contributing towards wider housing delivery across both authority areas. This benefit attracts substantial weight in the planning balance and supports compliance with the Framework's Golden Rules

- the site occupies a sustainable location; and

¹ [Affordable Housing and housing developments – Welwyn Hatfield Borough Council](#)

² North Herts District and Stevenage Borough Councils: SHMA PART II UPDATE INCLUDING IMPACT OF FIRST HOMES 2023 Report of Findings November 2023

As set out in the assessment of Policy S5(1)(j), the site is sustainably located between Welwyn and Codicote, with convenient access to local services and facilities, bus services, public rights of way and Welwyn North railway station. The site is therefore well connected by a range of sustainable transport modes and represents a sustainable location for residential development.

- major housing proposals comply with the Golden Rules.

The Golden Rules are now set out in Policy GB8: 'The Golden Rules' and states that all the contributions set out in GB8(1) are to be met. Again, we address each part below:

(a)(ii) As Policy HO5(1)(a)(ii) is not yet in force, the Framework requires the provision of affordable housing at a level 15 percentage points above the highest affordable housing requirement that would otherwise apply, subject to a cap of 50%. The proposed development provides 55 affordable homes (50%) and therefore fully satisfies this requirement

55 affordable homes (50% affordable housing), significantly exceeding local policy requirements and meeting the NPPF expectation that major Green Belt development should provide at least 50% affordable housing unless viability considerations indicate otherwise. Affordable housing is integrated throughout the development and comprises a mix of affordable rent and shared ownership homes

(b) Necessary improvements to local or national infrastructure;

The proposal ensures that the impacts of development are appropriately mitigated through planning obligations secured via a Section 106 Agreement pursuant to the Town and Country Planning Act 1990 (as amended). These obligations will secure all necessary infrastructure and mitigation measures required to make the development acceptable in planning terms, including affordable housing, education, transport, healthcare, open space management and other site-specific requirements where justified. In addition, the Welwyn Hatfield element of the development will be liable for Community Infrastructure Levy (CIL) payments in accordance with the Council's adopted Charging Schedule. Together, these mechanisms will ensure that the development appropriately contributes towards the provision of local infrastructure and mitigation measures required to support the scheme, in accordance with the Framework.

(c) The provision of new green space, or improvements to existing green space, Provision of enhanced green infrastructure and public open space, including retained woodland, hedgerows, structural planting, ecological corridors, SuDS features and

publicly accessible open space. The scheme also delivers a measurable Biodiversity Net Gain and long-term environmental enhancements.

NPPF Policy GB8(2) states that substantial weight should be given to the importance of complying with the Golden Rules. The proposal demonstrably satisfies each component of Policy GB8. Compliance with the Golden Rules therefore attracts substantial weight in favour of the proposal and further reinforces the appropriateness of the development within the Green Belt.

Flood and Drainage

NPPF Policies F4 to F8 require development to be safe for its lifetime and not increase flood risk elsewhere.

The submitted Flood Risk Assessment demonstrates that, whilst a small part of the site is identified as Flood Zone 2 on the Environment Agency Flood Map for Planning, detailed Environment Agency hydraulic modelling confirms that flood extents do not encroach onto the development site and that the site is effectively located within Flood Zone 1. This approach is consistent with Annex F, which recognises that the Flood Map for Planning should not be considered in isolation and that regard should also be had to more detailed Environment Agency datasets and other flood risk evidence.

The layout directs development away from areas of surface water flood risk and incorporates a comprehensive Sustainable Drainage System (SuDS) strategy. The development will:

- retain existing overland flow routes;
- restrict discharge to greenfield runoff rates;
- reduce runoff during extreme storm events;
- accommodate appropriate climate change allowances; and
- avoid increasing flood risk on-site or elsewhere.

The FRA therefore demonstrates that the development can be delivered safely throughout its lifetime while effectively managing flood risk and surface water drainage. Accordingly, the proposal complies with Policies F4, F5, F7 and F8 of the Framework.

Conclusion

The proposal benefits from direct support under Policy S5 through addressing an evidenced unmet housing need in a sustainable location, satisfies Policy GB7(g) through the development of Grey Belt land, and complies with the Golden Rules under Policy GB8. Significant weight should therefore be afforded to the principle of residential development.