

affordable housing statement

Moor Mill Tanker Depot, Smug Oak Lane, Bricket Wood, St Albans AL2 3TZ

The demolition and removal of existing buildings and the construction of up to 16 dwellings with revised access arrangements.

On behalf of Smug Oak Lane Limited

Ref: SOL/154G/ahs

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Preliminaries

I have a BA (Hons) in Geography and an MSc in Urban and Rural Planning and I am a Chartered Member of the Royal Town Planning Institute.

The information and evidence in this Statement have been prepared and are given in accordance with the guidance of the RTPI and I confirm that the views expressed are my genuine professional opinions.

Brian Parker, January 2026



Introduction

1. This Affordable Housing Statement is submitted as part of an Outline Planning Application for up to 16 dwellings at Moor Mill Tanker Depot, Smug Oak Lane. It is submitted on the basis that the proposal is currently a 'major development' as defined in the current National Planning Policy Framework (December 2024) and, consequently, 50% of the dwellings must be affordable housing to comply with Paragraphs 155d, 156 and 157.
2. The Statement considers the affordable housing provided by the scheme in the context of national and local policy.

Planning Policy Context

National policy context

3. The NPPF sets out the Government's policy on housing, with affordable housing an essential component.
4. Paragraph 61 states:

"To support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay."

5. Paragraph 63 states:

"... the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies ..."

6. Paragraph 64 states:

"Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required²⁹ (including the minimum proportion of Social Rent homes required), and expect it to be met on-site unless:

a) off-site provision or an appropriate financial contribution in lieu can be robustly justified; and

b) the agreed approach contributes to the objective of creating mixed and balanced communities."

NB - footnote 29 references Annex 2 of the Glossary

7. Annex 2 of the NPPF states that Affordable Housing is

“housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); and which complies with one or more of the following definitions ...”.

8. Those definitions comprise: Social Rent; Other Affordable Housing for Rent; Discounted Market Sales Housing; and Other affordable routes to home ownership.

9. Paragraph 65 states:

“Provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas (where policies may set out a lower threshold of 5 units or fewer). To support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount³⁰”.

NB – footnote 30 explains this requirement does not apply to applications subject to the ‘Golden Rules’ in Paragraphs 156-157.

10. Paragraph 66 of the NPPF states:

“Where major development involving the provision of housing is proposed, planning policies and decisions should expect that the mix of affordable housing required meets identified local needs, across Social Rent, other affordable housing for rent and affordable home ownership tenures.”

11. Paragraphs 156-157 require major developments in the Green Belt to deliver an affordable housing contribution:

“... 15 percentage points above the highest existing affordable housing requirement which would otherwise apply to the development, subject to a cap of 50%. In the absence of a pre-existing requirement for affordable housing, a 50% affordable housing contribution should apply by default.”

12. Nothing in the NPPF explains or suggests that some types of affordable housing are more worthy or important than others. This principle that all types of affordable housing are equal was confirmed by the Minister for Housing and Homelessness on behalf of the Secretary of State when accepting the Recommendations of Inspector Michael Boniface MSc MRTPI (Refs: 5/2022/3194; APP/B1930/W/22/3312277) who wrote at Paragraph 592:

“... the Framework does not rank different types of affordable housing or suggest that some types are less important than others.”

13. Furthermore, the Planning Practice Guidance¹ explains that:

“All households whose needs are not met by the market can be considered in affordable housing need.”

¹ ‘What types of households are considered to be in affordable housing need?’ Paragraph: 018 Reference ID: 2a-018-20190220

14. In December 2025, a consultation version of the NPPF was published. Changes are proposed to how the scale of proposals is to be assessed, with a new concept of “medium” scale if – as here – the number of dwellings to be built is between 10 and 49. Proposals which qualify as “medium” maybe subject to/entitled to different requirements/rights, including in respect of affordable housing.
15. Whilst at the time of submission, the consultation NPPF should carry no weight, if a new official version is published prior to the Decision, it would carry weight and the Applicant is content to discuss the implications of any changes with the Council.

Local policy context

16. There is no affordable housing policy for major sites in the Green Belt in the current Development Plan. This was confirmed at a meeting of the Planning Referrals Committee on 26th July 2021, when Officers publicly explained that Policy 8 “Affordable Housing in the Green Belt” is a rural exceptions policy restricted to specific villages and so does not apply to major sites in the Green Belt.
17. The Council’s 2004 Affordable Housing Supplementary Planning Guidance (“the SPG”) did not (and cannot) set Policy². However, it is a material consideration in decision-making and it set an affordable housing contribution target of 35% on large sites in the Green Belt. Importantly, it did not seek to rank or prefer one type of affordable housing over another.
18. Draft Policy HOU2 of the Emerging Local Plan proposes affordable housing requirements on schemes of 10 or more homes or where the site is 0.5 hectares or more. It proposes an affordable housing tenure mix of 60% Rented Affordable Housing and 40% Affordable Home Ownership. Because it is subject to significant unresolved objections and because the Plan will be subject to a Main Modifications consultation, expected sometime in 2026, little weight should be given to this Draft Policy in accordance with Paragraph 49 of the NPPF.

Affordable Housing Evidence

19. The latest evidence of affordable housing need in St Albans is the South West Herts Local Housing Needs Assessment Update by Icen Projects Limited, March 2024. Table 7.32 “Overall Annual Affordable Housing Need” identifies an overall affordable housing need for the District of 802 dwellings. This comprises 449 Rented Affordable Housing and 353 Affordable Home Ownership, which equate to 56% and 44% of the overall need, respectively.
20. 802 affordable homes per annum equates to 91% of the Emerging Local Plan’s annual target of 885 dwellings. However, Policy HOU2 seeks a maximum of 40% affordable housing from major schemes: lower even than that

² The PPG “**What is the role of supplementary planning documents?**” confirms that SPDs (as SPGs were previously known) “... cannot introduce new planning policies into the development plan”. Ref: Paragraph: 008 Reference ID: 61-008-20190315

required by the Golden Rules. Thus, it is clear that the Council is planning not to meet the affordable housing need of thousands of households.

Affordable Housing Proposal

21. Whilst the eventual mix will be subject to discussion with the Council (and any changes to national policy), the proposal is to deliver 8 no. Discounted Market Housing Homes, i.e. at least 50% as required by national policy.
22. To conform with the definition in Annex 2 of the NPPF, the eight affordable homes will be sold at a discount of at least 20% below local market value. It is envisaged that provisions will be included in the Section 106 Agreement to ensure the housing remains at a discount for future households.

Conclusion

23. Paragraphs 155d, 156 and 157 of the NPPF require 50% of major schemes in the Green Belt to be affordable.
24. In the absence of an adopted policy for the tenure mix, in the knowledge that the next Local Plan is planning not to meet the need for Home Ownership housing and in the wake of the Secretary of State confirming that no type of affordable housing is more important than another, the delivery of 8 Discounted Market Sales Housing is fully compliant with national policy.

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