

Affordable Housing Statement

Land off Bullens Green Lane, Colney Heath

Affordable Housing Statement

Outline planning application for residential development of up to 100 dwellings, including 45% affordable and 10% self-build, together with ancillary works

Land off Bullens Green Lane, Colney Heath

Canton Ltd

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OUR REF: M20/0509-01.RPT

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Appendices

Appendix 1 [FOI Correspondence \(4 June 2020, 3 July 2020, 9 July 2020, and 5 August 2020\)](#)

Appendix 2 [Affordability Indicators Summary](#)

Introduction

Section 1

- 1.1 **Tetlow King Planning** are instructed by **Canton Ltd** to examine the affordable housing sector within the St Albans City and District Council and Welwyn Hatfield Borough Council administrative areas in relation to their outline proposal for residential development on Land off Bullens Green Lane, Colney Heath.
- 1.2 Analysis has been provided for both local authorities due to the site falling approximately 50% within in each administrative area.
- 1.3 The proposed development is for up to 100 dwellings, of which 45% (up to 45 dwellings) are to be provided as affordable housing. This exceeds the requirements of policy 7A (30%) of the St Albans District Local Plan Review (1994); policy H7 (30%) of the Welwyn Hatfield District Plan (2005); and emerging policy SP7 (35%) of the emerging Welwyn Hatfield Borough Council Local Plan 2013-2032.
- 1.4 Providing a significant boost in the delivery of housing is a key priority of the Government's National Planning Policy Framework. Having a thriving active housing market that offers choice, flexibility and affordable housing is critical to our economic and social well-being.
- 1.5 Given the identified needs for affordable housing, and the substantial shortfall in delivery across both authorities, the proposal is considered to provide significant community benefits which are a strong material consideration in favour of the development.
- 1.6 The statement has sought to reply upon identical freedom of information requests (FOI's) to each authority. Unfortunately, St Albans have declined to provide a response. This is contrary to Welwyn Hatfield Borough Council who swiftly provided a response to all the questions. Notwithstanding, the lack of

response from St Albans Tetlow King Planning is able to conclude that there is a desperate need for more affordable housing in each authority.

1.7 This statement comprises five sections:

- Section 2 reviews relevant Development Plan policies from each authority and other material considerations relevant to the site;
- Section 3 provides analysis of affordable housing needs and delivery performance of each authority;
- Section 4 sets out a range of affordability indicators by authority; and
- Section 5 provides our conclusions and recommendations.

The Development Plan and Related Policies

Section 2

Introduction

- 2.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, applications should be determined in accordance with the Development Plan unless material consideration indicate otherwise.
- 2.2 The Development Plan policies and other material considerations relevant to this application are set out for each Local Authority area below.

The Development Plan

- 2.3 The Development Plan for St Albans City and District Council administrative area comprises the saved policies of the St Albans District Local Plan Review (1994).
- 2.4 Within the Welwyn Hatfield Borough Council administrative area, the development plan comprises the saved policies of the Welwyn Hatfield District Plan (2005).
- 2.5 Other material considerations include:
- the St Albans City and District Affordable Supplementary Planning Guidance (2004);
 - the Welwyn Hatfield Borough Council Planning Obligations Supplementary Planning Document (2012);
 - the NPPF (2019);
 - the PPG (on going updates);
 - the emerging St Albans City and District Local Plan 2020-2036;
 - the emerging Welwyn Hatfield Borough Council Local Plan 2013-2032; and
 - the emerging Colney Heath Neighbourhood Plan.

St Albans District Local Plan Review (1994)

- 2.6 The St Albans District Local Plan review was adopted in November 1994, covering the period 1981 to 1996. In 2007, a Direction was made saving specified policies of the Plan. The saved policies are therefore the remaining operational policies within the District until replaced by the emerging Local Plan.
- 2.7 Policy 2 of the Plan is concerned with the settlement strategy for the District. The policy classifies Colney Heath (where the application site is located) as a green belt settlement (ref. GBS.4).
- 2.8 New housing development in green belt settlements is dealt with by Policy 6 and states that:
- ‘Within the Green Belt settlements listed in Policy 2, housing development will not normally be permitted unless the dwellings are permitted to meet the local needs of agriculture, forestry, leisure and local services which cannot practically be met in a location outside the green belt.’*
- 2.9 The policy goes on to highlight that *‘affordable housing schemes in the green belt settlements will be assessed against Policy 8’*.
- 2.10 The Plan has two saved policies relating to affordable housing. The first is Policy 7a which is concerned with affordable housing in towns and specified settlements. The policy states that:
- ‘In the towns and specified settlements as defined in Policy 2, the Council will therefore normally seek to negotiate an element of affordable housing on sites over 0.4 hectares and on sites under this size where 15 or more dwellings are proposed.’*
- 2.11 The policy then goes on to set out a number of criteria planning applications will be assessed against. Given that the Colney Heath is not defined in Policy 2 as a town or specified settlement for development, but rather a green belt settlement, it is considered this policy is not applicable to the determination of this application.
- 2.12 The second affordable housing policy is Policy 8 which is concerned with affordable housing in the metropolitan green belt. The policy states that

permission for affordable housing for local needs will only be granted where the criteria set out are met.

- 2.13 This policy operates much like a modern rural exceptions policy requiring all dwellings provided on site to be affordable and kept as such in perpetuity. It is considered that this policy also does not apply to the application site as the proposed development is not exclusively for affordable housing.
- 2.14 It is therefore considered that the Plan is silent on affordable housing requirements for the application proposals as the proposed development is not solely affordable housing nor is it located in a specified town or settlement.

Welwyn Hatfield District Plan (2005)

- 2.15 The Welwyn Hatfield District Plan was adopted in 2005, covering the period 1991 to 2011. In April 2008, a Direction was made saving specified policies of the Plan. The saved policies are therefore the remaining operational policies within the District until replaced by the emerging Local Plan.
- 2.16 Chapter 9 of the plan is concerned with housing and notes in the introduction that *‘One of the main objectives of the District Plan is to provide a strategy for residential development to provide for the housing needs of the local community, including those in need of affordable and special needs housing.’*
- 2.17 Paragraph 9.5 sets out the Plans strategy and objectives for residential development. Objective ‘C’ is to *‘provide for housing for local people whether private, affordable or special needs housing and for all sectors of the community’*.
- 2.18 Policy H2 of the plan is concerned with the location of windfall residential development. The policy states that:

‘The development of sites for over 10 units or 0.25 ha that are not listed in Policy H1 will not be permitted if they would result in a significant oversupply of housing in the district.’
- 2.19 The policy then goes on to highlight a number of exceptions including if the development provides for local affordable housing needs or other clearly identified local housing needs.

2.20 Paragraph 9.37 goes on to note that the Council will expect a minimum of 30% of units on all eligible sites to be subsidised housing to meet local needs. This is a requirement on residential sites of 25 units or more, or on residential sites over 1ha in size.

2.21 The following paragraph continues that the ‘*Council will expect the affordable housing to incorporate a range of housing types and unit sizes to meet local need. For each eligible site, the Council will define a preferred mix for the affordable housing element.*’

2.22 Policy H7 is specifically concerned with affordable housing stating that:

Within the towns and specified settlements, the Council will expect all proposals for residential development on sites of 1ha or more, or with 25 units or more, to include the provision of affordable housing to meet the needs of local people who cannot afford to occupy dwellings generally available on the open market. The Council will therefore seek through negotiation a proportion of affordable housing, which as a minimum should comprise 30% subsidised housing, on each suitable site. The proportion, type and mix of affordable housing will be based on information in the latest housing needs survey and the criteria in Section 10 of Circular 6/98.

2.23 Whilst the application site itself is not within a town nor specified settlement and is therefore not technically beholden to Policy H7; the site would provide for local affordable housing needs and therefore complies with exceptions outlined in Policy H2 and consequently should meet the requirements set out in Policy H7.

2.24 Policy H8 of the Plan deals with dwelling type and tenure stating that:

The Council will expect new residential developments to incorporate a range of dwelling types and sizes, where appropriate. The Council will expect a mix of dwelling types in developments to reflect the shortfall of flats, bedsits and one- and two-bedroom properties in the district. Dwellings of different tenure should be mixed on site to avoid the creation of large areas of housing with similar characteristics.

Material Considerations

St Albans City and District Council Affordable Housing Supplementary Planning Guidance (2004)

- 2.25 The Albans City and District Council Affordable Housing Supplementary Planning Guidance (SPG) was adopted by the council in March 2004. The SPG sets out the council's negotiation position for the element of affordable housing to be delivered on suitable development sites.
- 2.26 The SPG provides supplementary guidance on the Council's main policy on Affordable Housing, Policy 7A of the District Plan, which is set out its Appendix B. The SPG notes at paragraph 1.10 the towns and specified settlements outlined in Policy 2 but also highlights that the SPG will *'also apply to open market housing developments that may be permitted in the Green Belt.'*
- 2.27 Chapter nine summarises the affordable housing requirements set out in the SPG and these are replicated below:
- *'The site size thresholds above which the Council currently seeks an element of affordable housing are 25 dwellings or 1 hectare. The Council will work to any amended thresholds that may be set in revised Government guidance.'*
 - *The percentage of affordable housing required will normally be 35%.*
 - *The council will negotiate a range of tenures for the affordable housing provision, but the majority of the provision is expected to be general needs rented (see section 5).*
 - *The Council prefers to see general needs rented housing delivered through an RSL.*
 - *The Council will seek the securing of the affordable housing for those in need "in perpetuity" i.e. for as long as there is a need for it in St Albans. This will be secured through a legal agreement attached to the planning permission or by planning conditions.*
 - *Developers are urged to contact the Planning Department prior to the submission of a planning application; the Planning Department will advise*

developers and refer them to the Housing Development Officer for discussion on sites where affordable housing is a requirement.

- *Affordable housing land should normally be transferred at nil cost to RSLs.'*

Welwyn Hatfield Borough Council Planning Obligations Supplementary Planning Document (2012)

- 2.28 The Welwyn Hatfield Borough Council Planning Obligations Supplementary Planning Document (SPD) was adopted by the council in February 2012. The SPD provides detailed guidance on the type and scale of planning obligations sought and sets out Welwyn Hatfield Borough Council's approach to securing planning obligations.
- 2.29 Sub heading 3.1 is concerned with affordable housing and paragraph 3.5 highlights that Policy H7 of the Welwyn Hatfield District Plan seeks the provision of a minimum of 30% affordable housing on all eligible sites.
- 2.30 Paragraph 3.6 notes that the provision of affordable housing will normally be sought through a section 106 agreement, and the council will expect details of the affordable housing to be provided as part of the development to be submitted as part of the planning application.
- 2.31 Paragraph 3.7 asserts that the council's affordable housing policy applies on residential sites of 25 units or more, or on residential sites over 1 hectare. Whilst the following paragraph sets out that *'Decisions about the type of affordable housing required, and the size and mix of tenures, should be informed by the latest housing needs surveys and assessments.'*

Emerging St Albans City and District Local Plan 2020-2036

- 2.32 The emerging St Albans City and District Local Plan was submitted to the Secretary of State in March 2019. Stage 1 hearing sessions held between 21 and 23 January 2020 on legal compliance, the Duty to Cooperate, the spatial strategy and matters relating to the Green Belt.
- 2.33 On 27 January 2020 the inspectors wrote to the council to raise their serious concerns in terms of legal compliance and soundness and to cancel the

subsequent hearing sessions arranged for February 2020. A second letter was sent on 14 April 2020 setting out these concerns in detail.

- 2.34 With regard to affordable housing provision, paragraph 91 of the letter states:

‘Although we understand that the Council has commissioned an updated Strategic Housing Market Assessment this has not yet been published. As a result, there is no up to date understanding of how many homes are needed and of what type, including the different sizes and types of affordable housing that may be required. Additionally, the Council rely on the brownfield register for its 10% smaller sites, but this is also not published. This list is not exhaustive, but it gives a flavour of the extent of missing documents that are critical to the examination of the Plan.’ (emphasis added).

- 2.35 Paragraph 93 concludes that:

As set out in our letter of the 27 January 2020 and above, we will not reach an absolute or final position until you have had chance to consider and respond to this letter. However, in light of our serious concerns regarding the DtC, we consider it a very strong likelihood that there will be no other option other than that the Plan is withdrawn from examination or we write a final report recommending its non-adoption because of a failure to meet the DtC. (emphasis added).

- 2.36 The council responded to the inspector’s letter on 2 July 2020, outlining its reasons for the inspectors to conclude that the main modification on the strategic rail freight interchange and, the Duty to Co-operate had been satisfied and that there were no other legal reasons for recommending that the plan is withdrawn at this stage.

- 2.37 At the time of writing the inspectors had not yet responded to the council’s letter and as such the emerging Local Plan should be afforded no weight in the determination of this application.

Emerging Welwyn Hatfield Borough Council Local Plan 2013-2032

- 2.38 The emerging Welwyn Hatfield Borough Council Local Plan was submitted to the Secretary of State in May 2017. Examination hearings commenced in

January 2018 however due to the COVID-19 (Coronavirus) pandemic all remaining stage 8 hearing sessions were postponed.

- 2.39 The postponed Stage 8 hearing sessions scheduled for May 2020 recommenced in July 2020 and will continue to be held throughout August 2020.
- 2.40 Emerging policy SP 7 is concerned with type and housing mix highlighting that as part of the overall housing target, a proportion of new homes built in the borough will be for affordable housing.
- 2.41 The policy goes on to require affordable housing provision on sites above 11 new dwellings or sites above 0.5 ha or more. The on-site delivery target varies by location, requiring 35% affordable housing provision on sites located in excluded villages (such as the application site).
- 2.42 Additionally, the policy requires at least 20% of all new dwellings on sites involving 5 or more new dwellings will be required to meet Building Regulations Part M4(2) standards for 'accessible and adaptable dwellings' (or as subsequently amended), the delivery of which should be distributed across market and affordable tenures.
- 2.43 It is also important to highlight that the inspectors post hearing advice note on the stage 6 hearing sessions (strategic matters) stated that:

'I consider that the evidence set out in the Strategic Housing Market Assessment Update 2017 together with that in subsequent review that was undertaken in the context of the 20016-sub national population and household projections, justifies a Full Objectively Assessed Housing Need (FOAHN) of 800 dwellings per year for the duration of the plan period and that this requirement is consistent with national policy'.

Emerging Colney Heath Neighbourhood Plan

- 2.44 The Colney Heath Neighbour Hood Plan area was designated on 27 February 2014 by the council's cabinet. There has been no progress since then and the neighbourhood planning process for the area appears to have stalled.

Summary

- 2.45 This section clearly highlights that within adopted and emerging policy, providing all forms of housing including affordable housing has long been established as, and remains a key priority for the Councils to address the housing crisis. The housing crisis continues to be and is of increasing importance at a national level.

Affordable Housing Needs and Past Delivery

Section 3

- 3.1 This section of the statement reviews the most recently produced Strategic Housing Market Assessment (SHMA) for each authority to determine affordable housing needs. It then identifies past delivery and goes on to compare the identified affordable housing needs against the delivery performance of each authority.

Affordable Housing Needs Evidence Base for St Albans

- 3.2 The most recently produced SHMA for the St Albans City and District Council administrative area the is the South West Hertfordshire SHMA (2016).
- 3.3 As previously highlighted at paragraph 2.34 of this statement, the Inspector to the emerging St Albans Local plan considered this SHMA to be dated, concluding there was no up to date assessment of housing need for the authority.
- 3.4 In the absence of an up to date assessment the 2016 SHMA is the most recent assessment of affordable housing need for the district and is therefore the figure applied in this Statement for St Albans.

South West Hertfordshire Strategic Housing Market Assessment (2016)

- 3.5 The SHMA was published in January 2016 and covers the period 2013 to 2036. The SHMA considers housing need over the period to inform strategic planning activities. This includes the need for different types of housing; and the housing needs of different groups within the population, such as older people and students.
- 3.6 The introduction to the SHMA highlights that:
- 'The SHMA does not set housing targets. It provides an assessment of the need for housing, making no judgements regarding future policy decisions which the Councils may take. Housing targets will be set through local plans. The SHMA*

provides an important input into setting targets for housing provision, but plan-making will also take into account factors such as the supply of land for new development, Green Belt, local infrastructure capacity and environmental constraints.' (emphasis added).

- 3.7 Table 39 of the SHMA sets out the annualised estimated affordable housing need for each authority and is replicated below at figure 3.1.

Figure 3.1: Estimated level of Affordable Housing Need per annum – by location

Area	Current need	Newly forming households	Existing households falling into need	Total need	Supply	Net need
Dacorum	30	609	308	947	581	366
Hertsmere	34	519	181	735	301	434
St Albans	33	663	161	858	241	617
Three Rivers	17	419	110	546	189	357
Watford	52	549	254	855	237	617
South West Herts	167	2,760	1,014	3,941	1,550	2,391

Source: 2016 SHMA -Table 39

- 3.8 The table identifies the affordable housing need in St Albans to be **617 dwellings per annum** over the period 2013 to 2036. This calculation of need uses a 30% gross income threshold for households.
- 3.9 Table 40 demonstrates estimated levels of affordable housing need at other variant income thresholds. The table finds that at a gross 25% income threshold (the recommended threshold in the 2007 SHMA guidance) the annual affordable housing need for St Albans increases to 764 affordable homes per annum over the period, an uplift of 24%.
- 3.10 The estimated level of affordable housing need per annum by type of affordable housing for each authority is set out in table 43. There is a net need for 102 intermediate affordable properties and 515 social/ affordable rented properties

per annum¹ in St Albans. This represents a tenure split of 17% intermediate properties and 83% social/ affordable rented properties per annum.

Past affordable housing delivery in St Albans compared to identified needs

- 3.11 Unfortunately, St Albans City and District Council has repeatedly declined to provide any data sought through a Freedom of Information request submitted to the council on 4 June 2020 and a subsequent internal review request sent on 9 July 2020. Full correspondence can be found at **Appendix 1**.
- 3.12 Therefore, where available, delivery data has been collated from Annual Monitoring Reports (AMR) publicly available to view on the council's website. This does however present a number of issues when comparing the data as it is unclear in some instances whether the reported figures are gross or net.
- 3.13 Additionally, there is no AMR publicly available to view online for the period 2016/17. As a result, the 2016/17 monitoring year has been omitted from the following analysis.
- 3.14 Notwithstanding these difficulties and deficiency's Tetlow King Planning are still above to review past delivery record as well as a number of other affordable housing indicators.
- 3.15 Figure 3.2 illustrates that since the start of the SHMA period in 2013 (excluding 2016/17), a total of 262 affordable homes have been compete in the St Albans administrative area. This is equivalent to just 52 affordable dwellings per annum.

¹ 102 + 515 = 617

Figure 3.2: Affordable housing delivery since the start of the SHMA period in 2013

Year	Total Housing Completions (Net - assumed)	Affordable Housing Completions (Net - assumed)	Affordable Housing delivery as a % of Total Completions
2013/14	375	-42	-11%
2014/15	313	70	22%
2015/16	369	97	26%
2016/17	'unknown'	'unknown'	'unknown'
2017/18	100	22*	22%
2018/19	731	115*	16%
Totals	1,888	262	14%

Source: St Albans AMRs (2019, 2018, 2016 errata sheet, 2015)

*Gross figures

- 3.16 Figure 3.3 illustrates affordable housing delivery compared to objectively assessed housing needs since the beginning SHMA period in 2013 (excluding 2016/17). When the SHMAs target of 617 net affordable homes per annum is considered against annual completions, there has been a chronic shortfall in delivery of some -2,823 affordable homes, representing a staggering -92% shortfall in affordable housing delivery.

Figure 3.3: Affordable housing delivery compared identified needs in the 2016 SHMA

Year	Affordable Housing Completions (Net)	2016 SHMA Net Annual Need	Shortfall in Affordable Housing Delivery	Shortfall Delivery as a % of Assessed Need
2013/14	-42	617	-659	-107%
2014/15	70	617	-547	-89%
2015/16	97	617	-520	-84%
2016/17	'unknown'	'n/a'	'unknown'	'unknown'
2017/18	22*	617	-595	-96%
2018/19	115*	617	-502	-81%
Totals	262	3,085	-2,823	-92%

Source: St Albans AMRs (2019, 2018, 2016 errata sheet, 2015), 2016 SHMA

*Gross figures

- 3.17 Furthermore, Figure 3.3 shows that not once has St Albans City and District Council met anywhere the 2016 SHMA affordable housing target of 617 net affordable homes. The table shows that there is a clear and pressing need to increase the delivery of affordable housing in the district to address identified needs and an increasing backlog.
- 3.18 It is important to note that gross affordable housing completions recorded in the tables fail to take account of any losses to stock, such as through the Right to Buy or through demolitions. The true picture of net affordable housing delivery in the district is therefore likely to be notably lower than -2,823 affordable homes since the start of the SHMA period.

Affordable Housing Needs Evidence Base for Welwyn Hatfield

- 3.19 Within the Welwyn Hatfield Borough Council administrative area, the most recently produced SHMA is the Welwyn Hatfield SHMA Update (2017). It is important to highlight this assessment of need has not been tested at Examination in Practice and should therefore be treated with caution.

Welwyn Hatfield Strategic Housing Market Assessment Update (2017)

- 3.20 The SHMA Update was published in May 2017 and covers the period 2015 to 2032. The 2017 Update SHMA comprises the third update to original SHMA for

Welwyn Hatfield produced in 2014. Each previous update considered newly released datasets and evidence influencing the OAN.

3.21 The 2017 update takes account of latest available datasets and guidance for assessing housing need in Welwyn Hatfield, as published in April 2017. The report also takes consideration of responses received during consultation on the pre-submission version of the Draft Local Plan where these related to the evidence base on housing needs.

3.22 Paragraph 20 of the SHMA Update states that:

‘Although this update has not reviewed the calculation of affordable housing needs in full, a discrete update has been applied to reflect the increased number of newly forming households anticipated under the updated demographic projection. This suggests that 818 affordable homes per annum will be needed in Welwyn Hatfield over the next five years, with 602 affordable homes needed annually thereafter.’ (emphasis added).

3.23 The paragraph continues that:

‘It is clear that meeting this need in full would require an overall level of housing provision far in excess of that needed to accommodate demographic growth in the population, support likely employment growth and respond to worsening market signals. The evidence of need in both these regards does not support a further quantifiable uplifting of the OAN in response to elevating levels of affordable housing provision.’

3.24 The paragraph concludes that:

‘It is considered that the successful affordable housing policies could, however, result in circa 160 affordable homes being delivered annually through provision of 793 dwellings per annum. This would significantly boost the recent level of affordable housing delivery and uplift the long-term average rate of delivery, responding to this evidenced high need.’ (emphasis added).

3.25 Given that 160 affordable homes per annum is a policy on calculation based on a Plan that has not been adopted using an evidence base that has not been tested, this statement does not seek to rely on this figure.

- 3.26 Instead it is considered that the affordable housing need for Welwyn Hatfield is **818 affordable homes per annum between 2015 and 2020**, with 602 affordable homes needed annually thereafter until 2032.

Past affordable housing delivery in for Welwyn Hatfield compared to identified needs

- 3.27 Figure 3.4 illustrates that since the start of the 2017 SHMA Update period in 2015, a total of 101 net affordable homes have been complete in the Welwyn Hatfield administrative area. This is equivalent to just 20 affordable homes per annum.

Figure 3.4: Net affordable housing delivery since the start of the 2017 SHMA Update period in 2015/16

Year	Total Housing Completions (Net)	Affordable Housing Completions (Gross)	Right to buy Sales	Affordable Housing Completions (Net)	Net Affordable Housing delivery as a % of Total Completions
2015/16	408	116	67	49	12%
2016/17	509	93	77	16	3%
2017/18	315	44	49	-5	-2%
2018/19	462	74	40	34	7%
2019/20	676	57	50	7	1%
Totals	2,370	384	283	101	4%

Source: Freedom of Information response (2 July 2020), 2017 SHMA Update

- 3.28 Figure 3.5 illustrates affordable housing delivery compared to objectively assessed housing needs since the beginning of the 2017 SHMA Update period in 2015. When the SHMA Updates target of 818 net affordable homes per annum is considered against annual completions, there has been a chronic shortfall in delivery of some 4,090 affordable homes, representing a staggering 98% shortfall in affordable housing delivery.

Figure 3.5: Net affordable housing delivery compared identified needs in the 2017 SHMA Update

Year	Affordable Housing Completions (Net)	2017 SHMA Update Net Annual Need	Shortfall in Affordable Housing Delivery	Shortfall Delivery as a % of Assessed Need
2015/16	49	818	-769	-94%
2016/17	16	818	-802	-98%
2017/18	-5	818	-823	-101%
2018/19	34	818	-784	-96%
2019/20	7	818	-811	-99%
Totals	101	4,090	-3,989	-98%

Source: Freedom of Information response (2 July 2020), 2017 SHMA Update

- 3.29 As with St Albans, figure 3.5 shows that not once has Welwyn Hatfield Borough Council met anywhere the 2017 SHMA Update affordable housing target of 818 net affordable homes. Even more concerning is the fact that in 2017/18 the council actually lost more homes than it delivered. The average delivery has been just 20 affordable homes per annum compared to a net need of 818. It is clear this council is failing to delivery sufficient affordable homes.
- 3.30 Once again, table demonstrates that there is a clear and pressing need to increase the delivery of affordable housing in the Borough to address identified needs and an increasing backlog.
- 3.31 Even though this Statement does not seek to rely upon the policy on figure of 160 net affordable homes per annum in the 2017 SHMA Update; figure 3.6 below demonstrates that even against this significantly lower need figure the picture remains the same. Yet again the council has not once since the start of the SHMA period has the council even met a third of this policy constrained affordable housing need figure.

Figure 3.6: Net affordable housing delivery compared identified needs in the Local Plan

Year	Affordable Housing Completions (Net)	2017 SHMA Update Net Annual Need	Shortfall in Affordable Housing Delivery	Shortfall Delivery as a % of Assessed Need
2015/16	49	160	-111	-69%
2016/17	16	160	-144	-90%
2017/18	-5	160	-165	-103%
2018/19	34	160	-126	-79%
2019/20	7	160	-153	-96%
Totals	101	800	-699	-87%

Source: Freedom of Information response (2 July 2020), 2017 SHMA Update

- 3.32 Yet again the council has not once since the start of the SHMA period has the council even met a third of this policy constrained affordable housing need figure. Evidently the council is actively failing some of its most vulnerable residents.

Conclusions on Affordable Housing Needs and Past Delivery

- 3.33 The above evidence demonstrates that across both the St Albans and Welwyn Hatfield administrative areas the councils' performance in delivering affordable housing falls significantly short of meet the needs residents.
- 3.34 Across St Albans District in the five-year period (excludes 2016/17) since the start of the 2016 SHMA in 2013/14 up to 2018/29 affordable housing delivery represented just 14% of overall housing delivery. Average delivery on a per annum basis over the same period have been just 52 affordable dwellings per annum.
- 3.35 When comparative analysis is undertaken with affordable housing delivery since the base date of the 2016 SHMA Update and the affordable housing needs identified by the SHMA, a shortfall of -2,823 affordable homes has accumulated in just five years (excluding 2016/17).
- 3.36 Within Welwyn Hatfield Brough, in the five-year period since the start of the 2017 SHMA Update period in 2015/16 net affordable housing delivery

represented just 4% of overall housing delivery. This is equivalent to just 20 affordable homes per annum.

- 3.37 Once again when comparative analysis is undertaken with net affordable housing delivery since the base date of the 2017 SHMA Update and the full affordable housing needs identified by the SHMA, a shortfall of -3,989 net affordable homes has accumulated in just five years.
- 3.38 The picture is just as bleak when comparison is made to the 2017 SHMA Update policy on figure of 160 affordable dwellings per annum over the period. In the five-year period since 2015/16 the council has over seen a shortfall of - 699 affordable dwellings.

Affordability Indicators

Section 4

Market Signals

- 4.1 The PPG recognises the importance of giving due consideration to market signals as part of understanding affordability in the context of Plan making.
- 4.2 This section sets out a range of affordability indicators for St Albans Council followed by the same indicators for Welwyn Hatfield Council.

Affordability Indicators for St Albans

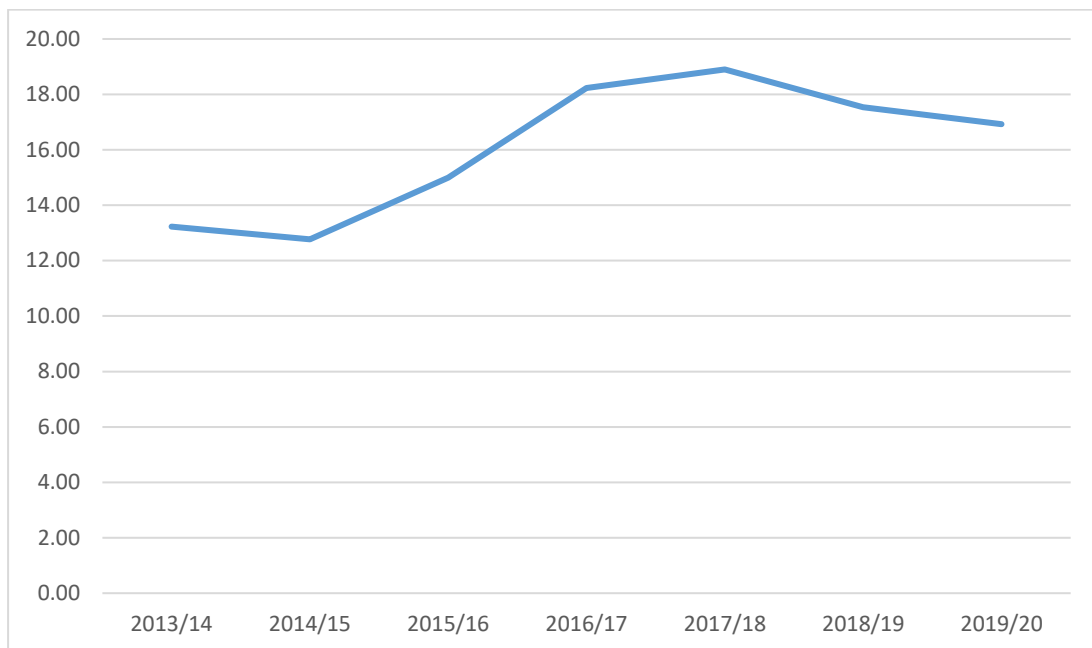
Average Affordability Ratio

- 4.3 The National Housing Federation (NHF) Home Truths report shows that in the period between 2013/14 and 2017/18 the average house price to average income ratio within the district increased from 10.5 to 13 which represents a 24% change.

Lower Quartile Affordability Ratio

- 4.4 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the situation is even worse. The lower quartile house price to incomes ratio in St Albans has increased by 24% from 13.23 in 2013/14 to 16.92 in 2019/20 as illustrated by figure 4.1 below.

Figure 4.1: Lower Quartile House Price to Income Ratio

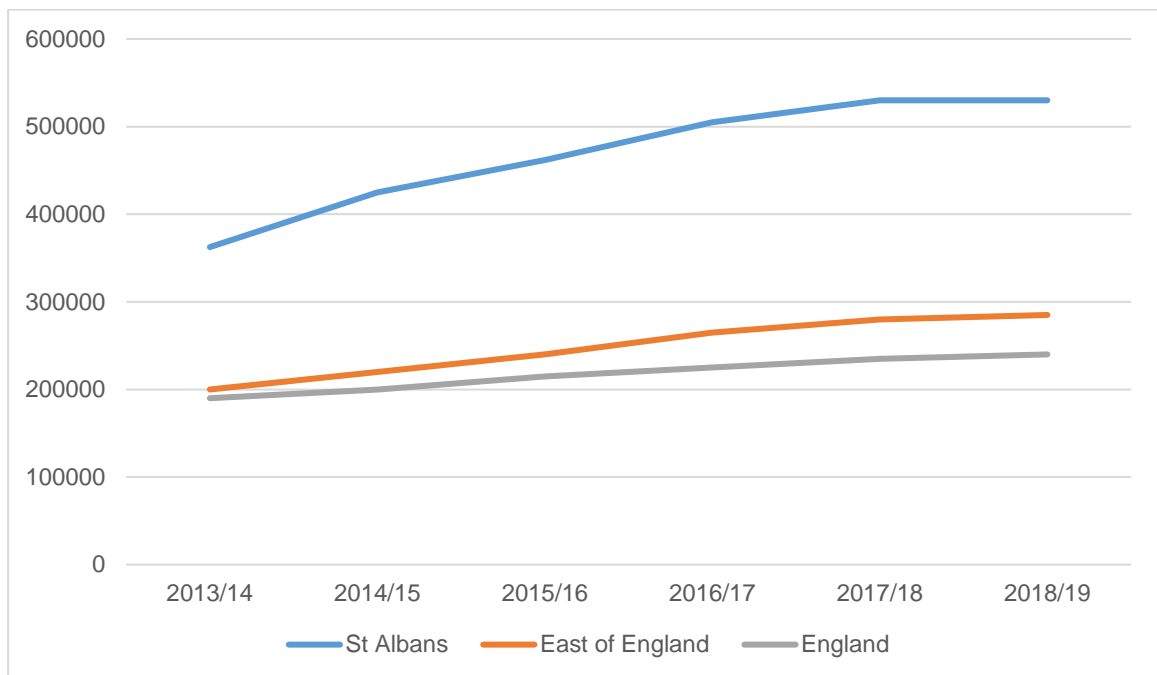


Source: ONS – Ratio of lower quartile house prices to lower quartile gross annual workplace-based earnings, Table 6c

House Prices

- 4.5 Over the period between 2013/14 and 2017/18 the NHF report an average house price increase of 39%, rising from £444,919 to £617,072, this has resulted in the income required to purchase an average priced home in the district with an 80% mortgage rising from £101,696 to £141,045 in the space of just five years.
- 4.6 By way of comparison, average earnings in the district saw an increase of just 12% from £42,448 to £47,554 over the same period.
- 4.7 Median house price data shows that in St Albans prices consistently exceed both the national and regional average with a 46% increase within the district since 2013/14 compared to 43% regionally and 26% nationally as shown at figure 4.2 below.

Figure 4.2: Median House Prices



Source: HPSSA Dataset 9

Private Rental Market

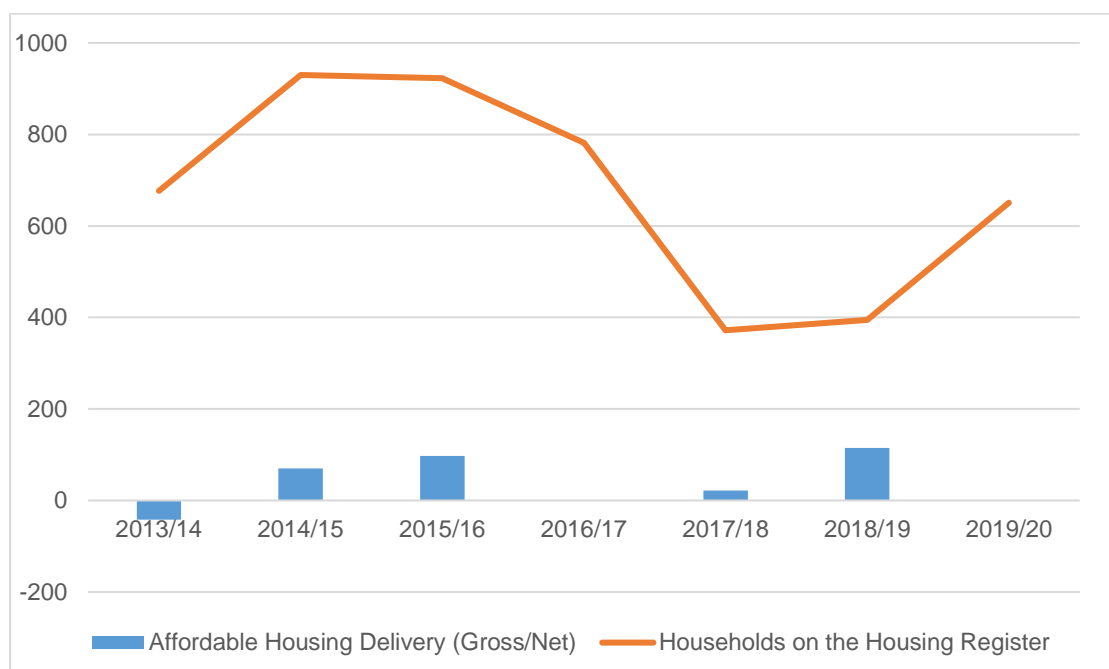
- 4.8 The picture for renters in St Albans is not much better with the NHF reporting that average monthly rents increased %13 from £1,171 pcm to £1,325 pcm between 2013/14 and 2017/18.
- 4.9 Valuation Office data indicates that in St Albans median private rents increased by 20% between 2013/14 and 2018/19 from £998 pcm to £1,200 pcm, outstripping the national average of 17%. Comparatively 2018/19 median private rents in St Albans are 51% higher than the average for the region and 73% than the rate of increase nationally.
- 4.10 The situation is even worse in the lower quartile private rental sector where VOA data indicates that rents have increased by 15% over the same period from £825 pcm to £950 pcm, which is higher than the national rate of increase of 13% from £465 to £525 and outstrips the regional increase of 25% from £500 to £625.

Housing Register

- 4.11 At 1 April 2019 there were a total of 2,808 households on the Council's Housing Register. Figure 4.3 below provides a comparative analysis of the number of

households on the Register and gross affordable housing delivery over the period since 2013/14.

Figure 4.3: Comparative Analysis of the Housing Register and Affordable Housing Delivery



Source: St Albans AMRs (2019, 2018, 2016 errata sheet, 2015), CLG Live Table 600

- 4.12 This demonstrates that affordable housing delivery has persistently fallen substantially short of meeting identified housing needs.

Affordability Indicators for Welwyn Hatfield

Average Affordability Ratio

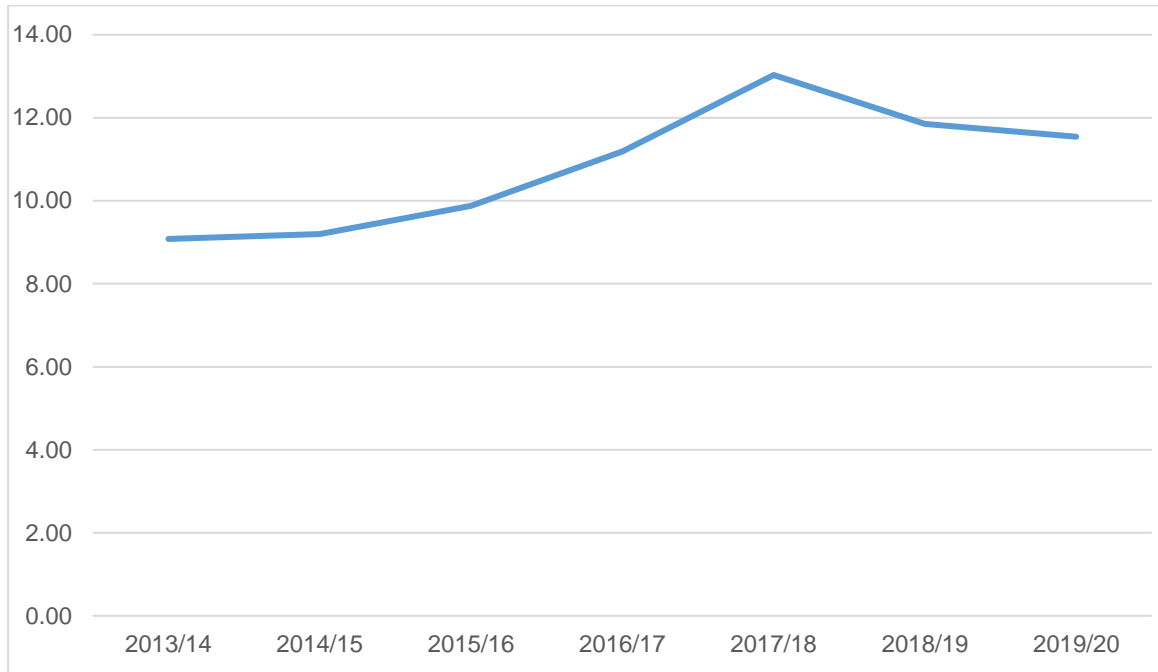
- 4.13 The National Housing Federation (NHF) Home Truths report shows that in the period between 2013/14 and 2017/18 the average house price to average income ratio within the borough increased from 11.9 to 15 which represents a 26% change.

Lower Quartile Affordability Ratio

- 4.14 For those seeking a lower quartile priced property (typically considered to be the 'more affordable' segment of the housing market), the situation is even worse. The lower quartile house price to incomes ratio in Welwyn Hatfield has

increased by 27% from 9.08 in 2013/14 to 11.54 in 2019/20 as illustrated by figure 4.4 below.

Figure 4.4: Lower Quartile House Price to Income Ratio

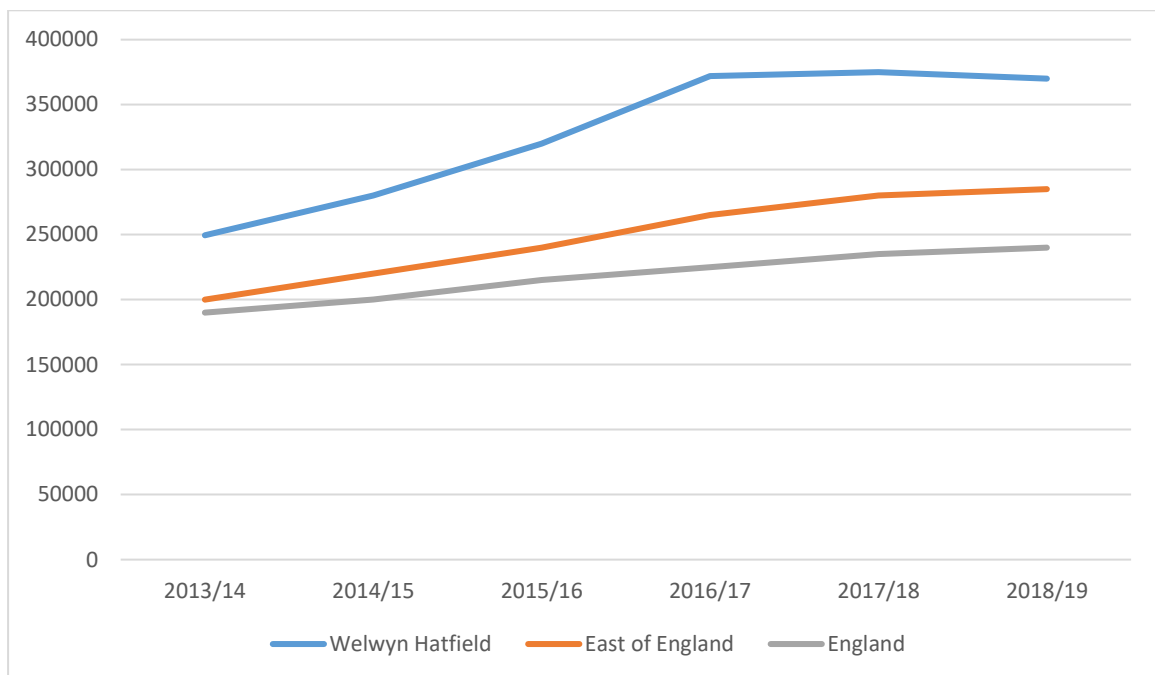


Source: ONS – Ratio of lower quartile house prices to lower quartile gross annual workplace-based earnings, Table 6c

House Prices

- 4.15 Over the period between 2013/14 and 2017/18 the NHF report an average house price increase of 42%, rising from £321,006 to £456,309, this has resulted in the income required to purchase an average priced home in the borough with an 80% mortgage rising from £73,373 to £104,299 in the space of just five years.
- 4.16 By way of comparison, average earnings in the borough saw an increase of just 7% from £27,035 to £28,822 over the same period.
- 4.17 Median house price data shows that in Welwyn Hatfield prices consistently exceed both the national and regional average with a 43% increase within the borough since 2013/14 compared to 43% regionally and 26% nationally as shown at figure 4.5 below.

Figure 4.5: Median House Prices



Source: HPSSA Dataset 9

Private Rental Market

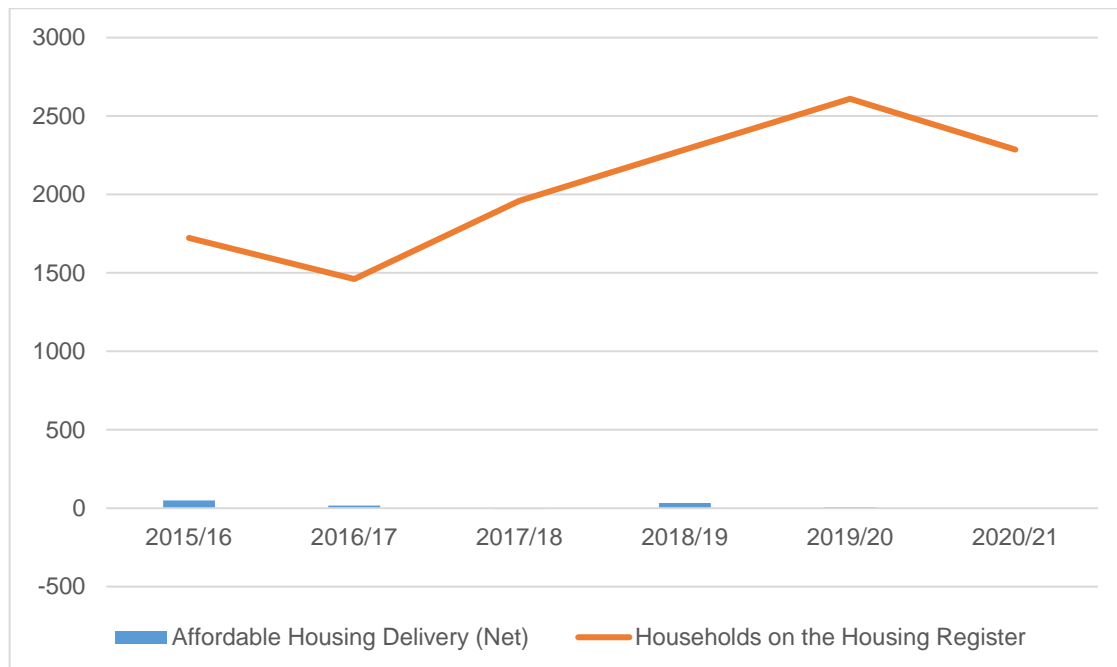
- 4.18 The picture for renters in St Albans is not much better with the NHF reporting that average monthly rents increased 4% from £1,103 pcm to £1,114 pcm between 2013/14 and 2017/18.
- 4.19 Valuation Office data indicates that in Welwyn Hatfield median private rents increased by 4% between 2013/14 and 2018/19 from £975 pcm to £1,010 pcm. Comparatively 2018/19 median private rents in Welwyn Hatfield are 27% higher than the average for the region and 45% than the rate of increase nationally.
- 4.20 The situation is even worse in the lower quartile private rental sector where VOA data indicates that rents have increased by 10% over the same period from £750 pcm to £825 pcm, which is double the national rate of increase of 5% from £500 to £525 and outstrips the regional rate of £625 in both 2013/14 and 2018/19.

Housing Register

- 4.21 At 1 April 2020 there were a total of 2,286 households on the Council's Housing Register. Figure 4.6 below provides a comparative analysis of the number of

households on the Register and gross affordable housing delivery over the period since 2013/14.

Figure 4.6: Comparative Analysis of the Housing Register and Net Affordable Housing Delivery



Source: Freedom of Information response (2 July 2020), CLG Live Table 600

- 4.22 This demonstrates that affordable housing delivery has persistently fallen substantially short of meeting identified housing needs.
- 4.23 As a result of changes introduced by the Localism Act 2011, Local Housing Authorities have been able to set their own Housing Register criteria from June 2012. For many authorities this has meant excluding applicants already on the list who no longer meet their new narrower criteria but who were still in need of affordable housing.
- 4.24 Following the freedoms introduced by the Localism Act, Welwyn Hatfield have published new Housing Allocations Policies in 2013 and 2020.
- 4.25 On 11 March 2016 *Inside Housing* reported that 159 English Councils have struck 237,793 people off their waiting lists and barred a further 42,994 new applicants since the Localism Act came into effect in June 2012. The Head of Policy at the Chartered Institute of Housing commented that the requirements

“generally aren’t good practice” as they can be “discriminatory depending on how long they’re applied”.

- 4.26 Such an approach does not reduce the need for affordable housing but instead makes it even harder for those unable to access open market housing to find a suitable place to live, with even more at risk of homelessness.
- 4.27 The research suggests a surge in people removed or barred from waiting lists, which is much higher than the 113,000 found by Inside Housing in April 2014. The article acknowledges however that there have been 775 occasions since 2012 where a decision to remove an applicant from the waiting list or refuse access has been reversed after it was contested.
- 4.28 This was also recognised in the House of Commons Briefing Paper: Allocating Social Housing (June 2017) which analysed the impact of new allocations policies. It highlighted that *“there has been a reduction in the numbers of applicants registering on local authority housing waiting lists following the introduction of revised housing allocation schemes under the Localism Act 2011”*.
- 4.29 The Briefing Paper found that the reasons for these reductions were that *“...English local authorities had used powers to limit access to social housing by amending their allocation policies...”* and *“...the requirements generally aren’t good practice”* as they can be *“discriminatory depending on how long they’re applied”*.
- 4.30 Indeed, there have been several legal challenges to local authority allocation schemes since the 2011 Act came into force and Councils were *“...reportedly reviewing their allocation policies...”* following a High Court judgement which held that a council’s allocation policy indirectly discriminated against women and disabled and older people.
- 4.31 Such an approach does not reduce the need for affordable housing but instead makes it even harder for those unable to access open market housing to find a suitable place to live, with even more at risk of homelessness.
- 4.32 The ability of Local Authorities to set their own qualification criteria in relation to Housing Registers was recognised by the Planning Inspector presiding over an

appeal at Oving Road, Chichester. In assessing the need for affordable housing in the District, and in determining the weight to be attached to the provision of affordable housing for the scheme which sought to provide 100 dwellings; the Inspector acknowledged that:

“The provision of 30% policy compliant affordable houses carries weight where the Council acknowledges that affordable housing delivery has fallen short of meeting the total assessed affordable housing need, notwithstanding a recent increase in delivery. With some 1,910 households on the Housing Register in need of affordable housing, in spite of stricter eligibility criteria being introduced in 2013 there is a considerable degree of unmet need for affordable housing in the District. Consequently, I attach substantial weight to this element of the proposal” (my emphasis).

- 4.33 It is important to note that the Housing Register is only part of the equation relating to housing need. The housing register does not constitute the full definition of affordable housing need as set out in the NPPF – Annex 2 definitions i.e. affordable rented, starter homes, discounted market sales housing and other affordable routes to home ownership including shared ownership, relevant equity loans, other low cost homes for sale and rent to buy, provided to eligible households whose needs are not met by the market.
- 4.34 There is no “Housing Register” for households who do not meet the council’s qualification criteria for social or affordable rented dwellings but still need assistance with their accommodation because they cannot afford a property on the open market. Intermediate housing is an important part of the affordable housing needs of the Borough, however there is no Housing Register for those needing an intermediate or shared ownership dwelling.
- 4.35 In short there remains a large group of households who fall within the gap of not being eligible to enter the housing register but who also cannot afford a market property and as such are in need of affordable housing. It is those in this widening affordability gap who, I suggest, are those who the Government intends to assist by increasing the range of affordable housing types in the new NPPF.

- 4.36 The Franklands Drive Secretary of State appeal decision in 2006 underlines how the Housing Register is a limited source for identifying the full current need for affordable housing. At paragraph 7.13 the Inspector drew an important distinction between the narrow statutory duty of the Housing Department in meeting priority housing need under the Housing Act, and the wider ambit of the planning system to meet the much broader need for affordable housing.
- 4.37 As such the number of households on the Housing register will only be an indication of those in priority need and whom the Housing Department have a duty to house. But it misses thousands of households who are in need of affordable housing, a large proportion of whom will either be living in overcrowded conditions with other households or turning to the private rented sector and paying unaffordable rents.

Temporary Accommodation

- 4.38 The extent of the affordable housing crisis within Welwyn Hatfield is such that at 1 April 2020 there were 98 households being housed in temporary accommodation within the Borough. A further 13 households were housed in temporary accommodation outside of the Borough at 1 April 2020. This represents a 7% increase from the 104 households housed in temporary accommodation within and outside the Borough at 1 April 2019².
- 4.39 Not only does this mean that those in need of affordable housing are being housed in temporary accommodation, which is unlikely to be suited to their needs, but for those housed in temporary accommodation outside of the Borough they are also located away from their support network. This would be particularly problematic for those with young children, especially single parent families.

Waiting times

- 4.40 In addition to which the wait to be housed in an affordable home within the Borough ranges from 11 months for a 1-bed affordable home through to an astonishing 24 months for a 4-bed affordable home. The waiting times for all

² The FOI response does not break down the 2019 figures between those housed in temporary accommodation within and outside the borough

affordable property sizes is set out at figure 4.7 below and presents further stark evidence of the acute affordable housing crisis afflicting Welwyn Hatfield Borough.

Figure 4.7: Housing Register Average Waiting Times

Size of Affordable Property	Average Waiting Time to be Housed at 1 April 2019	Average Waiting Time to be Housed at 1 April 2020	%age change
1-bedroom home	12 months	11 months	-8%
2-bedroom home	12 months	12 months	0%
3-bedroom home	10 months	10 months	0%
4-bedroom home	14 months	24 months	+71%
4+ bedroom home	29 months	No data available	n/a

Source: Freedom of Information response (2 July 2020)

Conclusions on Affordability Indicators

- 4.41 Analysis of market signals in St Albans and Welwyn Hatfield clearly demonstrate a trend of decreasing affordability across both local authority areas. A summary of the affordability indicators for each authority is available to view at **Appendix 2**.
- 4.42 What is increasingly clear is that both authorities require their respective Council's to take an aspirational approach in order to boost significantly the supply of housing, and affordable housing to address the acute affordability crises.

Conclusions and Recommendations

Section 5

- 5.1 The provision of affordable housing is a key part of the planning system. A community's need for affordable housing was first enshrined as a material consideration in PPG3 in 1992 and has continued to play an important role in subsequent national planning policy, including the National Planning Policy Framework.
- 5.2 Canton Ltd proposes the development of 100 dwellings at Land off Bullens Green Lane, Colney Heath. The proposed development will provide 45% (up to 45 dwellings) as affordable housing.
- 5.3 The analysis of the Development Plan, affordable housing delivery, and relevant housing market indicators in the preceding three sections of this report, clearly point towards the importance of delivering a high level of affordable housing in Hambleton. This section draws together the key issues and the reasons why the proposed development is necessary now to meet affordable housing needs.

Key issue 1: Meeting identified needs as soon as possible

- 5.4 Against the latest evidence of affordable housing need set out South West Hertfordshire SHMA (2016) and the Welwyn Hatfield Strategic Housing Market Assessment Update (2017); neither council will be able to meet its affordable housing requirements unless one accepts that the significant shortfalls in provision are cleared over the remaining SHMA periods. However, this approach means that the housing need will be met more slowly. It is important not to underestimate the serious economic and social impact that this can have on real people. Households in both authorities may find themselves stuck in unsuitable, overcrowded or expensive housing for longer than is necessary.
- 5.5 Given the recognised social and economic benefits of good housing (and conversely, the serious adverse effects of poor quality or inadequate housing),

it is Tetlow King Planning's position that **every effort should be made to meet affordable housing needs as soon as possible**, and ideally within the first five years. Put simply, the more affordable housing that is delivered now, the quicker that households in new and existing need can be housed, and the less time they will spend in unsuitable accommodation.

- 5.6 This is consistent with the approach taken to general purpose housing; Planning Practice Guidance recommends that when calculating five-year housing land supply, any shortfalls are met within the first five years unless otherwise agreed through a Local Plan that has been examined.
- 5.7 It is also consistent with the approach taken by Inspectors at Section 78 planning appeals. This includes Land at Fountain Lane, Davenham³ where the Inspector accorded significant weight to affordable housing as part of the package of social and economic benefits of the scheme (paragraph 42). This assessment was reached on the basis of meeting affordable housing needs over a five-year period, against which the Council was underperforming.
- 5.8 The appeal decision at Land at Foldgate Lane, Ludlow⁴ dealt with similar issues. Although the Inspector concluded that the relevant policies for the supply of housing were up-to-date at the time, it remained the case that weight to be accorded to the benefit of affordable housing was a matter for the decision taker. In that case, the proposed development exceeded affordable housing requirements (25% provision proposed, versus a 15% requirement) and the Inspector noted the Council was behind its trajectory in delivering affordable housing, again based on evidence that the need should be addressed within five years. The Inspector also noted the contribution to the overall national shortage of affordable housing as well as market housing. The Inspector therefore concluded affordable housing to be a significant benefit in favour of the scheme.
- 5.9 It must also be borne in mind that the Framework does not suggest that housing requirements and targets are somehow a 'ceiling' to delivery. Paragraph 59 of the Framework makes clear the Government's core objective of "*significantly*

³ Appeal reference APP/A0665/A/14/2226994

⁴ Appeal reference APP/L3245/W/15/3137161

boosting” the supply of housing and paragraph 60 subsequently explains that local housing needs assessments should identify “*the minimum number of homes needed*”.

- 5.10 At present, neither council is on course to achieve this with a shortfall of 2,823 (excluding 2016/17) dwellings to date in St Albans administrative area and a shortfall of some -3,989 affordable dwelling’s in Welwyn Hatfield administrative area. If both councils are to meet their identified needs within the next five years they would need to deliver 1,182 and 1,616 affordable homes per annum respectively. Those in need of affordable housing require it now and not diluted over a the remaining SHMA periods. Failing to deal with affordable housing in the swiftest possible way just leaves people languishing on the councils waiting lists.
- 5.11 Looking ahead, even if the existing backlog of affordable housing need is met, there will remain a newly arising affordable housing need which is greater than the expected rate of re-lets meaning the Councils will need to continue to boost affordable housing delivery into the future.

Key issue 2: Providing a mix of tenures

- 5.12 The proposed development will deliver a mix of affordable tenures to meet a variety of housing needs. The housing affordability indicators discussed at Section 3 of this Statement reveal that housing in both St Albans and Welwyn Hatfield is significantly more expensive than the regional average, both for those seeking to purchase and to rent. This has real implications for household finances. It also prevents those households in both private and affordable rented housing from accessing home ownership due to the large deposits needed to purchase homes in both authorities.
- 5.13 The proposed development will deliver up to 100 dwellings, of which 45% (up to 45 dwellings) are to be provided as affordable housing. This exceeds the requirements of policy 7A (30%) of the St Albans District Local Plan Review (1994); policy H7 (30%) of the Welwyn Hatfield District Plan (2005); and emerging policy SP7 (35%) of the emerging Welwyn Hatfield Borough Council Local Plan 2013-2032.

- 5.14 In this context, all 45 homes within the proposed development will help to meet identified affordable housing needs, as well as reducing the Council's sizeable housing register.

Key issue 3: Addressing the real-life impact of poor affordability

- 5.15 The provision of affordable housing to meet identified needs is not just a numerical exercise. Housing is a key part of ensuring a good quality of life for all and delivers real social and economic benefits. This underlines the importance of meeting affordable housing needs as soon as possible.
- 5.16 The Affordable Housing Commission, comprising fifteen commissioners from across the public, private and voluntary sectors, issued its full report at the end of March 2020. It explores the effects that poor housing can have on its occupants, with a particular focus on the reliance upon the private rented sector in housing those at the lower end of the housing market. Research by the Commission found that three in ten households are negatively affected by their housing situation.
- 5.17 The Commission's reports highlights the serious adverse effects that poor housing affordability and conditions have upon real households. The most common was found to be include worsening mental health for those affected. It also impacts upon the life choices that households must make; for example, parents may find their adult children staying at home for a lengthy or even indefinite period; and couples may delay having children themselves if they are unable to house them. Housing stress can push households into hardship, increasing reliance on foodbanks and household debts (e.g. overdrafts or credit cards). At its most extreme, households can find themselves homeless.
- 5.18 The Commission identifies a series of challenges for tenants in the private rented sector, and particularly the lower end of the market⁵. These include short / insecure tenancies, poor quality housing, and rising levels of overcrowding. It also identifies a cohort of 'frustrated first time buyers' who could afford to purchase but are prevented from doing so by the 'deposit barrier'⁶.

⁵ Affordable Housing Commission report (March 2020), pages 73 and 74

⁶ Affordable Housing Commission report (March 2020), section 14

- 5.19 The proposed development will alleviate these challenges by providing high quality affordable housing, operated by a responsible and experienced housing association. Occupants will benefit from lower rents than in the private rented sector, the benefits of living in a modern house suitable for their needs, in better condition and more energy efficient than existing stock. The provision of rent to buy and shared ownership homes will also help to meet the needs of households wishing to buy but ‘trapped’ in the private rented sector or occupying affordable rented housing that could be released to meet priority needs.

Conclusions

- 5.20 The grant of planning permission at this site will therefore enable up to 45 additional affordable homes to be delivered within the next five years, helping to meet the Council’s existing identified need sooner. Households needing affordable housing will also spend less time on the waiting list stuck in unsuitable accommodation. This will improve the lives of those real households who will benefit from the provision of high quality, affordable homes that meet their needs.
- 5.21 The proposed development will also mean the Councils will be better placed to address the most severe housing issues such as those households facing crisis through homelessness. The proposed affordable housing will come forward in a mix of tenures including affordable rented housing and affordable routes to home ownership, therefore helping to meet the needs of different parts of the housing market.
- 5.22 In summary, the proposed development will:
- Meet the Council’s identified affordable housing need as soon as possible;
 - Meet the needs of a wide range of households including those in priority need and those seeking to purchase but who are currently prevented from doing so;
 - Provide an affordable housing offer that exceeds both adopted and emerging policy requirements for both authorities;

- Deliver tangible benefits through better housing for real people in real need, now; and
- Help reduce the substantial waiting lists.

5.23 **Tetlow King Planning therefore recommends that the proposed development is approved**, to enable the prompt delivery of much-needed affordable housing.

Appendix 1

FOI Correspondence (4 June 2020, 3 July 2020, 9 July 2020 and 5 August 2020)

From: [Annie Gingell](#)
To: FOI@stalbens.gov.uk
Cc: [James Stacey](#); [Andy Moger](#)
Subject: Freedom of Information request
Date: 04 June 2020 10:16:37
Attachments: [image001.png](#)

Dear Sir/Madam,

Can you please provide the following data in line with the provisions of the Freedom of Information Act.

-
Housing Register
-

1. The total number of households on the Council's Housing Register at 1st April 2020.
2. The total number of households on the Council's Housing Register at 1st April 2020 specifying Colney Heath Ward as their preferred choice of location.
3. Of those households in question 3 above, how many meet the local connection criteria for being housed in Colney Heath Ward.
4. The average waiting times at 1 April 2018 and 1 April 2019 for the following types of affordable property in the St Albans Council region:
 - a. A shared accommodation affordable dwelling;
 - b. 1-bed affordable dwelling;
 - c. 2-bed affordable dwelling;
 - d. 3-bed affordable dwelling;
 - e. 4-bed affordable dwelling; and
 - f. A 4+ bed affordable dwelling.
5. The average waiting times at 1 April 2019 and 1 April 2020 for the following types of affordable property in the St Albans Council region:
 - g. A shared accommodation affordable dwelling;
 - h. 1-bed affordable dwelling;
 - i. 2-bed affordable dwelling;
 - j. 3-bed affordable dwelling;
 - k. 4-bed affordable dwelling; and
 - l. A 4+ bed affordable dwelling.
6. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed.

Social Housing Stock

7. The total number of social housing dwelling stock at 1st April 2019 in Colney Heath Ward.
8. The total number of social housing dwelling stock at 1st April 2020 in Colney Heath Ward.
9. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred.

Social Housing Lettings

10. The number of social housing lettings in the following periods in Colney Heath Ward:
 - a. 1 April 2017 and 1 April 2018;
 - b. 1 April 2018 and 1 April 2019; and
 - c. 1 April 2019 and 1 April 2020.

Housing Completions

11. The number of NET housing completions in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.
12. The number of NET affordable housing completions in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.
13. The number of NET housing completions in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20.

14. The number of NET affordable housing completions in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20.

Right to Buy

15. The number of social rented dwellings lost in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20 through:
- a. Right to Buy;
 - b. Preserved Right to Buy;
 - c. Voluntary Right to Buy; and
 - d. Right to Acquire
16. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.
17. The number of social rented dwellings lost in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20 through:
- a. Right to Buy;
 - b. Preserved Right to Buy;
 - c. Voluntary Right to Buy; and
 - d. Right to Acquire.
18. The number of Right to Buy replacements funded by receipts from Right to Buy sales in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20.

Temporary Accommodation

19. The number of households on the Housing Register housed in temporary accommodation within the St Albans Council region at 1st April 2019.

20. The number of households on the Housing Register housed in temporary accommodation outside the St Albans Council region at 1st April 2019.
21. The number of households on the Housing Register housed in temporary accommodation within the St Albans Council region at 1st April 2020.
22. The number of households on the Housing Register housed in temporary accommodation outside the St Albans Council region at 1st April 2020.

I look forward to hearing from you. If there are any issues with providing any of the data then please get in touch.

Annie Hamilton Gingell BSc (Hons) MSc

Planner

TETLOW KING PLANNING

Please read our statement on COVID-19 [here](#)

TK_logo



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From: [Eva Radkowska](#)
To: [Annie Gingell](#)
Subject: FOI Response Exemption - Template 22.4.20.doc
Date: 03 July 2020 11:04:24
Attachments: [FOI Response Exemption - Template 22.4.20.doc](#)

Dear Ms Gingell

Please now find attached a response to your recent FOI request which I trust will be clear.

Kind regards.

FOI Co-ordinator

St Albans District Council
Civic Centre
St Peters Street
St Albans
AL1 3JE

T: 01727 819494 Int ext. 2494
E: eva.radkowska@stalbans.gov.uk

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Our Ref: FOI/Gingell
Please ask for: FOI Team
Email: foi@stalbens.gov.uk
Direct Line: (01727) 819209
Date: 3 July 2020

BY EMAIL: Annie.Gingell@Tetlow-King.co.uk

Dear Ms Gingell

Freedom of Information Request Ref. No.

I write with regard to your request for information sent by email to St Albans City and District Council. Your email was received by the Council on 4 June 2020.

Under the Freedom of Information Act 2000, we are required to confirm what information we hold, and if we do hold the information, disclose the information, subject to exemptions or other provisions applying.

You requested:

Housing Register

1. The total number of households on the Council's Housing Register at 1st April 2020.
2. The total number of households on the Council's Housing Register at 1st April 2020 specifying Colney Heath Ward as their preferred choice of location.
3. Of those households in question 3 above, how many meet the local connection criteria for being housed in Colney Heath Ward.
4. The average waiting times at 1 April 2018 and 1 April 2019 for the following types of affordable property in the St Albans Council region:
 - a. A shared accommodation affordable dwelling;
 - b. 1-bed affordable dwelling;
 - c. 2-bed affordable dwelling;
 - d. 3-bed affordable dwelling;
 - e. 4-bed affordable dwelling; and
 - f. A 4+ bed affordable dwelling.
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 - i. 2-bed affordable dwelling;
 - j. 3-bed affordable dwelling;

- k. 4-bed affordable dwelling; and
 - l. A 4+ bed affordable dwelling.
6. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed.

Social Housing Stock

7. The total number of social housing dwelling stock at 1st April 2019 in Colney Heath Ward.
8. The total number of social housing dwelling stock at 1st April 2020 in Colney Heath Ward.
9. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred.

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11. The number of NET housing completions in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.
12. The number of NET affordable housing completions in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.
13. The number of NET housing completions in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20.
14. The number of NET affordable housing completions in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20.

Right to Buy

15. The number of social rented dwellings lost in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20 through:
- a. Right to Buy;
 - b. Preserved Right to Buy;
 - c. Voluntary Right to Buy; and
 - d. Right to Acquire

16. The number of Right to Buy replacements funded by receipts from Right to Buy sales in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.
17. The number of social rented dwellings lost in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20 through:
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Temporary Accommodation

19. The number of households on the Housing Register housed in temporary accommodation within the St Albans Council region at 1st April 2019.
20. The number of households on the Housing Register housed in temporary accommodation outside the St Albans Council region at 1st April 2019.
21. The number of households on the Housing Register housed in temporary accommodation within the St Albans Council region at 1st April 2020.
22. The number of households on the Housing Register housed in temporary accommodation outside the St Albans Council region at 1st April 2020.

Our response:

We can confirm that we do hold some information which is provided within this response.

We consider that exemptions apply to the information you have requested and we have explained this below:

Your request has been considered in accordance with the Freedom of Information Act 2000 ("the Act"), relevant ICO decision notices and Tribunal cases. We consider that section 12 of the Act applies to your request.

Section 12 (1) of the Act states the following:

12.— Exemption where cost of compliance exceeds appropriate limit.

(1) Section 1(1) does not oblige a public authority to comply with a request for information if the authority estimates that the cost of complying with the request would exceed the appropriate limit.

The cost limit for complying with a request for the Council is £450. ICO guidance states staff time should be rated as £25 per person per hour, regardless of their position. We consider that compliance with the request would exceed the compliance time limit of 18 hours.

Your request requires input from various officers in different departments due to the scope of each question. We have carried out a sampling exercise to assess the time it would take to comply with your request.

We have set out the estimates from this sampling exercise below.

Questions 1-6 relating to Housing Register

The relevant officer has advised it would take 30 minutes to calculate the number of householders on the Council's Housing Register as at 1st April 2020. Questions 2, 4 and 5 require a review of individual applications to extract this information due to the way the information is held. The relevant team has recently changed IT systems therefore they cannot generate a report of the time between the application and moving date for those properties previously offered.

The relevant officer has advised 223 properties have been allocated as at 19 June 2020 and it would take approximately 30 minutes per property to comply with this information.

It would therefore take over 112 hours to respond to this section of the request.

Questions 15- 18 relating to Right to Buy

The relevant officer has advised it would take between 832 hours to collate responses to this section of your request, due to the way this data is held.

Question 15 would require the officer to locate the data from various spreadsheets and government returns. The officer has advised some of this data may be difficult to access. They have advised it would take an average of 3 hours for each quarter and they hold 16 years of data therefore the estimated time is 192 hours.

Question 16 would require the officer to locate the data from various spreadsheets and match receipts against expenditure from other sources of information. The relevant officer has advised it would take an average of 4 hours for each quarter and they hold 16 years of data therefore the estimated time is 256 hours.

Question 17 would require the officer to locate the data from various spreadsheets and modifying the information in accordance with geographical location. They have advised it would take an average of 3.5 hours for each quarter and they hold 16 years of data therefore the estimated time is 224 hours.

Question 18 would require the officer to cross reference the information collated for the other questions in this section. They have advised it would take an average of 2.5 hours for each quarter and they hold 16 years of data therefore the estimated time is 160 hours. This estimate assumes the information for questions 15-17 has been collated and the relevant officer has advised responding to this question would take much longer without this.

The examples set out above demonstrate complying with the request exceeds the cost of compliance, therefore the exemption in section 12 of the Act applies to your request.

Advice and assistance

There is a duty for public authorities to provide reasonable advice and assistance under section 16 of the Act.

Due to the way the information is held, it is difficult to advise how your request can be reduced to fall within the remit for compliance.

In carrying out the sampling exercise, the relevant officers provided answers to some questions where the information was readily available. Although we are unable to selectively respond to questions when section 12 of the Act applies, we are providing you with the following information for assistance:

2. There generally isn't a local connection criterion to a Ward but to the Council as a District. A local connection has to be proved in order to be accepted onto the housing register. Specific developments may have a local lettings policy which prioritises specific attributes of the applicant i.e. working, lived in area etc. This information is available on the Council's webpage.
6. Details available in the allocations policy, available on the Council's website.
7. 151
8. 154
9. No

If you are dissatisfied with this response the Commissioner's Office recommends that you first refer the matter to the Council. You can do this by writing to foi@stalbans.gov.uk asking for an internal review of my decision. If you wish the Council to undertake an internal review, then you must write to the Council within 40 working days of the date of this letter. The Council will not consider any requests received after this date unless there are exceptional circumstances for the delay.

You have a right to appeal to the Information Commissioner's Office at the following address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely

FOI Coordinator
Corporate Services

From: [Annie Gingell](#)
To: [Eva Radkowska](#)
Cc: foi@stalbans.gov.uk; [James Stacey](#); [Andy Moger](#)
Subject: RE: FOI Response Exemption - Template 22.4.20.doc
Date: 09 July 2020 16:05:55
Attachments: [image001.png](#)
[3.FOI Response BCC - 6 June 2018.pdf](#)
[FOI Request \(FO-7082\).msg](#)

Dear Eva,

I wish to lodge a formal complaint regarding the council's response to my Freedom of Information (FOI) request dated 4 June 2020, which was received on 3 July 2020, stating that in order to provide the information requested the cost of compliance would exceed the statutory limits.

I would first like to highlight the fact that Tetlow King Planning have requested this data from over 70 local authorities across the country since 2014, only one of which has previously cited that the cost of compliance would exceed the appropriate limits. In this single instance out of 70+ cases, Birmingham City council estimated that it would take them 22 hours to fully answer the FOI request (see attached response), by comparison St Albans has quoted 1,055 hours to provide the same data. A substantial disparity of 1,033 hours. You should also be aware that an agreement was reached with Birmingham City Council whereby a second reduced FOI request was sent, and a full response was then received from Birmingham City Council within the statutory 20-working daytime limit.

Based on our prior experience to date it appears that in this particular instance St Albans Council has acted unreasonably and this is the principle reason for this formal complaint.

Based on the hours quoted in the council's response, when one assumes a typical working day of 7.5 hours, the council believes it would take in excess of 147 days to respond to just 22 questions, equating to more than 6 and a half days per question. For context, there are 262 working days in the calendar year for 2020 so the Council's position appears to be that it would take more than half a year to respond to this FOI request. This is made all the more peculiar when it is viewed in the context of 70+ other local authorities providing the very same information within 20-working days as required by the FOI Act. Given that the Council are required to provide most of the data requested to MHCLG as part of their central government returns and/or the data must be produced for the council's own Annual Monitoring Reports it is unclear how the Council has arrived at these time estimates.

For example, the council should record the number of housing and affordable housing completions within the authority area and this data should be readily available to the relevant officers. Similarly, the number of people on the housing register at 31 March/1 April forms a key component of the Council's central government returns each year (see MHCLG live table 600).

It is pertinent to note that the same FOI request sent to St Albans Council was also sent to Welwyn Hatfield Borough Council (immediately adjoining the St Albans local authority administrative area) on the same day. Welwyn Hatfield Borough Council have provided answers to all of the questions within the 20-working day statutory response period (see attached email).

Given all of the above, it seems reasonable to offer the council an opportunity to now reconsider

its position and provide a response to the initial request, or alternatively, to enter in to an active dialogue in respect of what information can be provided as was the case with Birmingham City Council, cited above.

I look forward to your response. Should you wish to discuss further then please contact James Stacey on 07852 919089 or Andrew Moger on 07884667892.

Kind regards,

Annie Hamilton Gingell BSc (Hons) MSc
Senior Planner
TETLOW KING PLANNING
Please read our statement on COVID-19 [here](#)

TK_logo



T: 0117 9561916 **M:** 07852 919089 **W:** tetlow-king.co.uk

This electronic transmission is intended only for the attention of the addressee. It may contain privileged and confidential information. If you have received this electronic transmission in error please notify us immediately by telephone, delete the transmission and destroy any hard copies. Tetlow King Planning Ltd has used all reasonable efforts to ensure that this message and any attachments are free from viruses.

From: Eva Radkowska <Eva.Radkowska@stalbans.gov.uk>
Sent: 03 July 2020 11:04
To: Annie Gingell <Annie.Gingell@tetlow-king.co.uk>
Subject: FOI Response Exemption - Template 22.4.20.doc

Dear Ms Gingell

Please now find attached a response to your recent FOI request which I trust will be clear.

Kind regards.

FOI Co-ordinator

St Albans District Council
Civic Centre
St Peters Street
St Albans
AL1 3JE

T: 01727 819494 Int ext. 2494
E: eva.radkowska@stalbans.gov.uk

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Please note for the time being during the Covid-19 pandemic, the Council will accept service by email.

The personal information you provide will be held in accordance with the General Data Protection Regulation (GDPR) and the Council's Data Protection Policy. You can find more information about how we will handle your personal information in our privacy notice: [Privacy Notice](#)

From: [Eva Radkowska](#)
To: [Annie Gingell](#)
Subject: Internal Review Response: Our Reference 000004515
Date: 05 August 2020 14:50:05



CORPORATE SERVICES
Head of Service - Simonne De Vall

Our Ref: 000004515
Please ask for: FOI Coordinator
Direct Dial: (01727) 819209
e-mail address: foi@stalbans.gov.uk
Date: 5 August 2020

Dear Ms Gingell

Freedom of Information Request – Internal Review 000004515

I write with regard to your request, received on 9 July 2020, for our response to be reviewed under the Freedom of Information Act (the Act) Internal Review procedure.

On the 4 June 2020 you requested information:

Can you please provide the following data in line with the provisions of the Freedom of Information Act.

Housing Register

1. The total number of households on the Council's Housing Register at 1st April 2020.
2. The total number of households on the Council's Housing Register at 1st April 2020 specifying Colney Heath Ward as their preferred choice of location.
3. Of those households in question 3 above, how many meet the local connection criteria for being housed in Colney Heath Ward.
4. The average waiting times at 1 April 2018 and 1 April 2019 for the following types of affordable property in the St Albans Council region:
 1. A shared accommodation affordable dwelling;
 2. 1-bed affordable dwelling;
 3. 2-bed affordable dwelling;
 4. 3-bed affordable dwelling;
 5. 4-bed affordable dwelling; and
 6. A 4+ bed affordable dwelling.
5. The average waiting times at 1 April 2019 and 1 April 2020 for the following types of affordable property in the St Albans Council region:
 1. A shared accommodation affordable dwelling;
 2. 1-bed affordable dwelling;
 3. 2-bed affordable dwelling;
 4. 3-bed affordable dwelling;
 5. 4-bed affordable dwelling; and
 6. A 4+ bed affordable dwelling.
6. Whether the Council has made any changes to its Housing Register Allocations Policy as a result of the provisions of the Localism Act and if so, when these occurred, and what they entailed.

Social Housing Stock

7. The total number of social housing dwelling stock at 1st April 2019 in Colney Heath Ward.
8. The total number of social housing dwelling stock at 1st April 2020 in Colney Heath Ward.

9. Whether all, or a part of, the Local Authority's social housing dwelling stock as been transferred to another organisation(s). If so, when did this occur and to whom (i.e. which housing association(s) or Arms-Length Management Organisation (ALMO)) was the stock transferred.

Social Housing Lettings

10. The number of social housing lettings in the following periods in Colney Heath Ward:

1. 1 April 2017 and 1 April 2018;
2. 1 April 2018 and 1 April 2019; and
3. 1 April 2019 and 1 April 2020.

Housing Completions

11. The number of NET housing completions in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.

12. The number of NET affordable housing completions in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20.

13. The number of NET housing completions in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20.

14. The number of NET affordable housing completions in Colney Heath Ward broken down on a per annum basis for the period between 2000/01 and 2019/20.

Right to Buy

15. The number of social rented dwellings lost in the St Albans Council region broken down on a per annum basis for the period between 2000/01 and 2019/20 through:

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Temporary Accommodation

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20. The number of households on the Housing Register housed in temporary accommodation outside the St Albans Council region at 1st April 2019.

21. The number of households on the Housing Register housed in temporary accommodation within the St Albans Council region at 1st April 2020.

22. The number of households on the Housing Register housed in temporary accommodation outside the St Albans Council region at 1st April 2020.

We responded to your request on 3 July 2020. You are unhappy with our response and you have stated:

I wish to lodge a formal complaint regarding the council's response to my Freedom of Information (FOI) request dated 4 June 2020, which was received on 3 July 2020, stating that in order to provide the information requested the cost of compliance would exceed the statutory limits.

I would first like to highlight the fact that Tetlow King Planning have requested this data from over 70 local authorities across the country since 2014, only one of which has previously cited that the cost of compliance would exceed the appropriate limits. In this single instance out of 70+ cases, Birmingham City council estimated that it would take them 22 hours to fully answer the FOI request (see attached response), by comparison St Albans has quoted 1,055 hours to provide the same data. A substantial disparity of 1,033 hours. You should also be aware that an agreement

was reached with Birmingham City Council whereby a second reduced FOI request was sent, and a full response was then received from Birmingham City Council within the statutory 20-working daytime limit.

Based on our prior experience to date it appears that in this particular instance St Albans Council has acted unreasonably and this is the principle reason for this formal complaint.

Based on the hours quoted in the council's response, when one assumes a typical working day of 7.5 hours, the council believes it would take in excess of 147 days to respond to just 22 questions, equating to more than 6 and a half days per question. For context, there are 262 working days in the calendar year for 2020 so the Council's position appears to be that it would take more than half a year to respond to this FOI request. This is made all the more peculiar when it is viewed in the context of 70+ other local authorities providing the very same information within 20-working days as required by the FOI Act. Given that the Council are required to provide most of the data requested to MHCLG as part of their central government returns and/or the data must be produced for the council's own Annual Monitoring Reports it is unclear how the Council has arrived at these time estimates.

For example, the council should record the number of housing and affordable housing completions within the authority area and this data should be readily available to the relevant officers. Similarly, the number of people on the housing register at 31 March/1 April forms a key component of the Council's central government returns each year (see MHCLG live table 600).

It is pertinent to note that the same FOI request sent to St Albans Council was also sent to Welwyn Hatfield Borough Council (immediately adjoining the St Albans local authority administrative area) on the same day. Welwyn Hatfield Borough Council have provided answers to all of the questions within the 20-working day statutory response period (see attached email).

Given all of the above, it seems reasonable to offer the council an opportunity to now reconsider its position and provide a response to the initial request, or alternatively, to enter in to an active dialogue in respect of what information can be provided as was the case with Birmingham City Council, cited above.

I look forward to your response. Should you wish to discuss further then please contact James Stacey on 07852 919089 or Andrew Moger on 07884667892.

In our original reply we stated Section 12 of the Act applied to your request.

Internal Review Response

We have considered your request for information, the Council's response to your request and your request for a review of this response. We have set out our findings below in response to each point raised in your request for an internal review.

Your request contained 22 main questions relating to 6 different topics. Due to the breadth of the questions, the questions were logged to 3 Council departments. Officers advised that they considered that complying with the request would exceed the time limit of 18 hours. A sampling exercise was carried out to gather an estimate of timescales for collating the information required to respond. This sampling exercise was carried out on a selection of questions from your request. As detailed in our original response, the sample was based on the Housing Register and Right to Buy topics.

We note your comments in relation to the Council's obligation to provide most of the data requested to MHCLG as part of their central government returns and/or for the council's own Annual Monitoring Reports.

We recognise that some of the information could have been provided within the time limit for compliance. However, ICO guidance provides that authorities must not selectively answer questions. In carrying out our sampling, officers did provide responses to some questions as the information was readily available. These responses were included in the 'Advice and assistance' section of our response as this information had been collated.

We understand other local authorities provided you with the information requested. Unfortunately, we cannot comment on the time estimates or responses provided by other authorities as each authority uses different systems.

The ICO's guidance states time estimates must be sensible and realistic based on the specific circumstances of the case. We note you consider it unclear how the Council arrived at these time estimates. The officers involved in the sampling exercise are best placed to estimate the time involved to extract the information requested because they understand the functionality of their systems.

We note your comments in relation to agreeing a reduced request with Birmingham City Council. Please be advised that the Council will consider a reduced request. Please let us know how you wish to refine the request. Your refined request will be logged as a new request and responded to within the statutory timeframe of 20 working days.

You have a right to appeal to the Information Commissioner's Office at the following address: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Yours sincerely



Head of Housing
HOUSING SERVICES

Your vote matters; don't lose it

The annual household registration canvass commences in July and every property within the district will receive an email or letter. If you're asked to respond, please do so as soon as possible. Details of how to do this will be provided.

Anyone who is not yet registered to vote will also need to register individually. Visit www.gov.uk/register-to-vote. Paper application forms will be sent upon request.

For further information visit www.stalbans.gov.uk/voting-and-elections or call 01727 819294

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To register, just go to www.stalbans.gov.uk/mystalbansdistrictaccount to access a personalised online account that gives you instant access to lots of useful council services, wherever you live in the District.

Appendix 2

Affordability Indicators Summary



Affordability Indicators Summary

Indicator	St Albans City and District Council	Welwyn Hatfield Borough Council
Average house price to average income ratio	13	15
Lower quartile house prices to income ratio	16.92	11.54
Average house price	£617,072	£456,309
Median house price	£530,000	£370,000
Average earnings	£47,554	£28,822
Income required for an 80% mortgage	£141,045	£104,299
Average private rents	£1,325 pcm	£1,114 pcm
Median private rents	£1,200 pcm	£1,010 pcm
Lower quartile private rents	£950 pcm	£825 pcm
Housing register	2,808 households at 1 April 2019	2,286 households at 1 April 2020
Temporary accommodation	Data not provided	At 1 April 2020 - 98 households in temporary accommodation within the Borough and 13 outside the Borough
Waiting times	Data not provided	At 1 April 2020 times range from 11 months for 1-bed to 24 months for a 4-bed affordable home.
Affordable Housing Delivery against identified needs	Accrued shortfall of -2,823 affordable dwellings since 2013/14 (excluding 2016/17)	Accrued shortfall of -3,989 affordable dwellings since 2015/16