

Our ref: SHP

19th January 2004

Cheryl Connelly Lead Inspector
Audit Commission
Inspection Service

Dear Cheryl

Following the publication of our draft CPA report here is our response in the format requested to help you take on board our points i.e.,

A – responses where we dispute the score – on 4 themes

B – factual errors and

C – improvements to wording and additional comments – in appendix 1. We also include an Appendix 2 with new evidence.

We start with a summary to make it clear what our key points are, before we get into the detail.

Overall Summary

- We are more concerned about accuracy of the report than the points, although think these can be revised upwards in places.
- We welcome much of the report is positive and acknowledges that we have moved on.
- We are alarmed about the false reference to hospital legality – our biggest issue with the report.
- We think the picture painted by the housing report is far too harsh – with the same (and only?) real criticism relating to lack of up to date housing strategy, boringly repeated throughout.
- There is little or no reference to the planning context for delivering housing – which provide real limitations to delivery affordable housing. Likewise the impact that the removal of LASHG is neither set out.
- The 'historical' issue in ambition – harking back to previous management.
- The issue about non-priorities – while at the same time acknowledging our healthy financial position.
- Some major factual errors – 72 days, not 72 weeks for B and B (still poor but not 'exceptionally' so)

While we are disappointed to have missed the top badge by a whisker, we are particularly keen now to get the report accurate. But we also hope to convince you to award some extra points in a number of places too, and offer new evidence in support of our arguments. Indeed our report does not look out of place against the other district councils that have got an excellent score!

There are two critical areas we want the Commission to address very closely. These are the **hospital legality issue**, which we know is simply incorrect, and the **housing report** which is overly negative. We explore both further here and I cannot stress enough our concerns about these two matters. Our Leader Martin Jennings has written to you separately on the hospital issue.

While we concentrate our response on the things we suggest need to be changed, we do welcome that much of the report is positive, draws on evidence presented on site and is upbeat in what it says about the Council and how far we have progressed since the pathfinding inspection. We have warmly welcomed the CPA process and the benefits it has brought us in motivating change, improving self-awareness and prompting a re-look at what we need to do to drive us forward. We are also very positive about the quality and thoroughness of the inspection team. Indeed our track record in acting on valid recommendations and responding to weaknesses is evident in the top score you have awarded us in the learning section. So while our comments concentrate on convincing you to put right a number of areas for our final report, they come from this positive background of full engagement in the process.

At the end of the letter we set out our desires for future inspection. Kristine Goodman says we will have to go through another inspection during the next financial year. If this is to be the case then a light touch check against our progress, timed when the other Worcestershire districts go through CPA, would be our preference and aid local comparison. However we will drive improvement whatever the Commission decide and take full responsibility for our own improvement.

Section A – our response where we dispute the theme scores

There are a number of themes where we think we deserve more marks. These are each looked at in turn below

1. Ambition – scored 3 in the draft report, we deserve a 4 on this because,

In the table on page 25 under this theme, there is only 1 weakness noted, relating to **historical leadership on housing**. Given the judgement should be a reflection of our current position then the use of the word 'historically' is not appropriate. Indeed the guidance states 'evidence of ambitions for improving local quality of life over the longer term (5-10 years).' We have also shared, through interviews and the housing progress report, the actions we have taken to demonstrate how far we have moved on post pathfinding.

Para.27 in the main report expands on this housing weakness and indeed is right to recognise that housing has moved up our local agenda. Are we being penalised for housing not always having been high up our list of priorities? Doesn't this conflict with the Commission's desire to see changing priorities? (We expand on this under 'prioritisation.')

Suggested wording that is accurate would be *"while housing was not a key priority for the Council following LSVT in 1994, this has now changed to meet local and national priorities with new investment in the service, a change of management and closer working with RSL partners."*

Our financial investment into the service supports this. I enclose new evidence (**Ref.1**) in Appendix 2 to demonstrate that our budgetary position has more than doubled, between 2000/1 and for 2004/5. This point is also relevant to investment – another theme where we would like the Commission to reassess scoring.

The report states that, “affordable housing has become a problem for the district”, however it fails to set out the wider regional and national context for this, such as the consequences of removal of LASHG and a restrictive regional planning framework. Indeed we should get the credit for being proactive with a member scrutiny team set up to examine opportunities to maximise delivery of affordable homes, against these very real constraints. Indeed at the last Council meeting on Jan 8th, the Housing Portfolio holder proposed a resolution that all of the new houses we need to allocate land for by 2011 should be affordable. While this demonstrates just how far housing has moved up the political agenda at Wychavon, what is frustrating is that we of course cannot do this under existing planning legislation. Recognising these points we feel we are justified a 4 for this theme.

2. Prioritisation – draft score of 3, we feel we deserve a 4 because,

A recurring problem for us is convincing the Commission that our exceptionally healthy financial management and capacity means that we have not had to make cuts to statutory services. We stated this clearly in our self-assessment. While we know this isn't commonplace, we are proud of this fact and thus dispute the weaknesses in the draft summary table on page 25 that we have limited evidence of moving resources out of non-priority areas, given we set out examples to show how we move money around through our virement process.

Members also make choices on budget programme options yearly – this also shows what is not a priority. The final on-site feedback on 5th November included the point that the ‘council clear about their non-priorities’ as a strength, yet this is now viewed as a weakness in the draft report, with ‘council not identified non priorities’! The new evidence of how we are investing significant extra resources into housing to reflect that this has moved significantly up our agenda (stated above) we hope finally convinces you. The draft report does contradict itself. It actually acknowledges the “low profile activity” of housing in para.44 – yet we are criticised for it being so at a time when it was lower on the national agenda.

In para.35, on the one hand we are commended for our strong financial position, yet criticised for not having to shift resources, other than within budgets. We will not accept criticism for strong financial management and good use of existing budgets to move money around within the overall budget.

Alternative wording could be, ‘through prudent management the council has excellent financial capacity and resources so it has not had to disinvest to fund priorities. It also operates effective devolved financial management so managers can vire between budgets and a business case based programme option process so that members make decisions about how new areas of spend and activity fit with strategic priorities’.

The only other weakness of this theme relates to housing. Our leading members have advised us that it is rather tedious reading the same point over and over again in the report. We do ask the Commission to acknowledge that having the right up to date information base is essential in good strategy development – accepting that this base could have been updated sooner. The other weakness on housing grants is incorrect. This money is not revenue but capital so the community has not lost out and the reasons for underspends relate to invoice processing capacity within Care and Repair, a legacy we are now dealing with.

3. Investment – currently scored 3, we deserve a 4 because,

The table on page 27 sets out three weaknesses. The first is about lack of **strategic investment in housing**. We have invested new money to build service capacity and put in place a new head of service – recognised in para.99. Contrary to para.102, we have also invested in strategic level consultation with key partners too. Discussions have covered affordable homes delivery, energy efficiency, decent homes and the way forward.

Accurate wording for this paragraph should be *"The council has invested in the housing service at a strategic level through engaging key partners to help the council develop an improved housing strategy. For example chief executives of the two main RSLs have held productive meetings with the Board, another with key officers from the service, finance, planning and strategy and with the housing scrutiny team too."*

The second draft weakness in the table is **risk management**, expanded upon in para.103 (and also para.64). While we have now amended service planning guidance for 2004/5 to not only make the risks explicit but also to summarise actions to minimise risks, it is incorrect to state that this isn't done in our risk registers – which contain greater detail. These are in action plan format and set out clearly how we can mitigate against identified risks. I enclose an example (**Ref.2**) of this in Appendix 2 in case you missed this while on site.

On the last weakness for this section on **member capacity** this is incorrect and should be deleted. Indeed we have increased investment in Member development in this financial year in recognition of the importance of Member capacity, particularly with the enhanced needs of a new council. We have retained this increased level for the next financial year too.

Para.104 also states that councillor take up was limited and that we have not investigated the reasons for this. Again this is not true. We have for example carried out surveys to assess councillor needs and plan training on this basis. Relative to our South Worcestershire neighbours we have a much higher attendance at jointly run sessions, so the attendance point needs to sit in a wider context. And our plans to increase Member attendance on courses are in place too. A good example is our appointed training co-ordinators for all political groups and a training points system is in place to encourage attendance. We also have nominated understudies for Board members.

The last sentence on scrutiny in para.104 needs to be deleted since we have specifically run training for Overview and Scrutiny members. Wychavon, in the regional capacity work being promoted by Government and co-ordinated through the West Midlands LGA, is being cited as a good example of member development. It was unfortunate that the arranged interview with our Support Services Manager to explore these issues further was cancelled. This would have helped clarify the good work we are doing rather than having to respond to these incorrect points now. I include further details on member development (**Ref.3**) in Appendix 2.

Page 25 summary table – The weakness on capacity for effective challenge needs to be more explicit.

4. Future Plans – currently scored 3, we feel we deserve a 4 because,

Both of your recorded weaknesses in the summary table page 27 are not correct and are new additions post the site feedback on 5th November. On the **waste issue** (para.123)

within the County context of contractual uncertainty we have progressed our waste and recycling work more than any other Worcestershire district and since this is a relative judgement this needs to be acknowledged. In fact we were the first district in Worcestershire to pilot backdoor recycling to residents back in 1996. We shared our draft recycling plan and consultation draft of the county wide Waste Management Strategy with you and our public space self-assessment summarised all the work we're doing on waste. Since our inspection there have been more developments on waste minimisation. For example, we have recently been successful in a joint bid with other local councils to offer heavily subsidised composters to every household in Herefordshire and Worcestershire. Every household will receive details of the scheme in March. In light of this development, we can review our free garden waste collection. From April, we will be able to offer residents a bookable, free collection of white goods through a Worcestershire wide scheme working with the community furniture recycling network. We can provide more evidence on all of these, do ask.

We note that Worcestershire's CPA waste management sub score is only 2, yet given the need to obviously work closely in two tier areas on this key issue, we have done as much as we can to be proactive. Our comparative position thus needs to be recognised in the final version. We do accept that since we were done 'on our own' inspectors would not have had this comparative picture to judge our waste performance against. This also contradicts the report – para.187 – which states our 'performance on waste management is improving' which is accurate.

The **hospital project issue** and the statement that, "the council does not always consider the legal implications" (para.124) is the biggest issue for us and is completely untrue. While we have an early opinion expressed by KPMG on this issue we have now shared the written evidence to the contrary from legal advisors (dated September 2003) with Kristine, and are attaching a copy (**Ref.4**) in Appendix 2, so you can make your own independent view. Inspectors really should have raised this crucial issue on site – this was rather too big a surprise and I can't emphasise enough the concern we have about how this has been handled in the report. The attached letter sets out in detail the legal powers for this work and indeed previously enabled the Council to take forward the supermarket project. We note that pathfinding inspection gave us a 4 on public space investment due to a large extent the innovation in the supermarket development. We should be credited for our use of the well-being powers in relation to the hospital development.

While this evidence clearly gives us the basis to proceed with the hospital, we are still at an early stage of development having only secured the formal agreement of the Strategic Health Authority to progress the hospital through this route for the Primary Care Trust. We are well aware that further and more detailed risk assessment work will be needed as the scheme progresses, indeed a full report will be compiled when we get to planning application stage in March and as normal processes proceed, e.g. tenders. No party is 'exposed' financially or otherwise to the project yet. The only area where we have committed expenditure of £250K is for the up front development costs and these were agreed in public at Council on 16 December 2003. We have negotiated with the PCT who have agreed to share abortive costs in the unlikely event of the project not proceeding.

If these two weaknesses are removed, we see no reason why we should not be awarded a 4 for this theme. With hindsight we underscored ourselves here too.

The two other weaknesses highlighted in the report in paragraphs 122 and 123 also need amending on **DDA** and **Housing Strategy** and we offer some alternative words. We believe our thorough approach to the DDA would stand up to robust challenge in the civil courts where DDA will be enforced. We have carried out audits on all our buildings and have a clear programme for implementation, ahead of many local councils.

Alternative wording that better describes our position is, "Wychavon has carried out a thorough and robust review of all buildings and made a substantial investment in priority areas to comply with DDA requirements".

On housing, given so few Councils have actually received the housing fit for purpose standard this seems a picky statement and has not been included in other CPA reports and should be omitted from ours. We do recognise we need to update our housing strategy however. That's why we are looking at the recent results of the updated housing needs information, recently shared also with the Member Scrutiny team. We are also updating our stock condition survey and using this updated intelligence to inform and develop an improved strategy. Surely inspectors would agree that this is the right way round, strategy needs to be based on up to date information, rather than attempt a new strategy without this sound basis? The report needs to credit the strategic framework for housing set out in the Council's 5 year strategy and draft promises for 2004/5 – a copy of these is included **(Ref.5)** in Appendix 2.

We suggest the following alternative wording "The current housing strategy is ranked 'average' by GOWM. The Council has strengthened the prominence of housing in its new 5 year strategy, developed draft promises for 2004/5 and has recently updated it's housing needs intelligence and is investing in updating its stock condition information. It will use this up to date information to develop a revised housing strategy."

There does appear an element of confusion throughout the report in relation to planning and the affordable housing debate generally. To clarify the Council's adopted planning guidance for affordable housing seeks up to 30% of any qualifying site to be affordable. Since this was introduced a couple of years ago we have seen the proportion of units on such sites increasing. But development is not as simple as you imply. Affordable housing is only one material consideration when determining complex planning applications. We are also in a straight jacket as far as housing supply goes. The regional and structure plan guidance only allows us to allocate 785 units up to 2011 and we are therefore very constrained by this in view of using the planning system to deliver. We don't get any credit for our rural regeneration strategies or our work with the Rural Housing Enabler to try and circumvent this and get some more new affordable units in the rural area.

B – Factual errors (numbers refer to paragraphs)

12 – the ethnicity is 1.2% - 2001 Census figures

42 – our review of plans did **not** include service plans so did not identify services with a low effectiveness – not within the remit of the study

52 – Having money and being debt free – doesn't make sense. There is no link.

69 – 72% of the National PIs were above average (not 73%), 51% in top quartile (not 45%), and 10% in the bottom quartile (not 11%). Private unfit dwelling PI made fit or demolished was above average, not bottom quartile.

71 – Revenues service also has Chartermark – not just Benefits.

82 – 65% improved and 35% worse or no change. However it's worth noting that the one indicator where there was no change was top quartile.

92 – 72 DAYS, not 72 weeks. So yes bottom quartile but delete reference therefore to "exceptionally poor".

97 – 2 SMT (senior management team) officers, not councillors

117 – we have achieved 85% against the E Government target, not 75%.

144 – Senior Planning Officer seconded to Housing Services (not other way round)

155 – 72 days, 10 weeks – see 92

168 – the LSPs are based on the three centres of population but also cover the surrounding rural areas

210 – it's the Wychavon Youth Strategy Group, not Sports Strategy Group

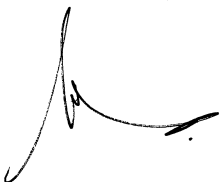
Finally on the future inspection issue we raised at the start of this letter. We have pulled out the key themes that could be the focus for a light touch check on our progress, if we need to be inspected again during the year as Kristine tells us. We will build these into our action plan, and many strengthen themes from our current improvement plan set out in our Annual Report. Your views on these at this stage would be useful.

- **Member development and scrutiny progress** – driving skills and capacity of our members and scrutiny in particular; additional training on performance management and providing a more effective challenge to the Board
- **Housing Strategy and on the ground delivery** – we will have a new strategy in place by then and will have made further improvements.
- **Waste management** – particularly progress on recycling and minimisation.
- **Hospital Plans** – and the more detailed work on risks as both parties commit themselves to the project.
- **Risk management** generally – through the service planning process and improved risk registers.

Do please call if you need any further detail or still feel you are missing vital information, there's always more we can dig out!

We look forward to receiving our revised report with scores to reflect our new evidence and comments.

With kind regards



Sid Pritchard
Managing Director



Fiona Narburgh
Head of Strategy & Communications

APPENDIX 1: WITH THE DETAIL

C – improvements to wording and additional comments (numbers refer to paragraphs)

4 - Performance monitoring is not new – we've done quarterly monitoring for several years, we just do it better and clearer now.

5 - '...tax increase affordable, at 2.5% for the last 3 years'

8 - While the lack of up to date strategy we accept, the service to customers is not poor (did you speak to customers to find out?)

13 - After the low employment bit add, 'but income levels are below average with a high proportion of part-time work' especially in rural areas

14 - It may be useful to insert after "predominantly conservative based", "as required by political balance regulations". As written, the paragraph gives the impression that there is an option of having greater representation from the minority parties on O & S which, legally, there is not

15 - At end add, 'due to widening the categories of applicants falling within priority need following the change in Homelessness legislation in July 2003

17 - Needs a summary explanation as to why inspectors disagree Wychavon is excellent – if because we haven't updated our housing strategy then say so!

24 - Hospital should be included here as good example too.

26 - Instead of 'not yet delivering' insert "and the council has already agreed an action plan and amended it's third priority to 'reaching out to everyone' with goals to drive it's inclusion ambitions as part of the agreed 5 year strategy"

27 - Clearly identified as not a priority at the time and policy/budgets reflect that.

'Affordable housing has become a problem for the district' – this statement should be balanced against matters outside of the Council's control, insert "until relatively recently" after "has not until" in first sentence. For the last sentence add "this should be balanced against matters outside the Council's control, for example:

- the loss of LASHG regime has impacted upon the Council's ability to subsidise new affordable housing development, without major financial consequences for the Council
- the general rise in house prices relative to local average incomes."

Conflicts with 29 – effective homelessness strategy.

29 & 30 – The three priorities are underpinned by promises which directly respond to public concerns identified through various forms of consultation – not primarily from the community forums. Community forums are (in the real world!) Council led, but are partnership events.

31 - Add at end "This also determines where savings/funding should be made and thus helps with prioritisation"

33 - Please add that we produce a monthly 'ASPIRE' staff newsletter too.

34 - We have – see para.1.2.1 in self-assessment (rather than the list we provided too), e.g. prioritise statutory and universal services and get these right and use the MORI data of what is viewed as important to many (do ask to see the full MORI report if haven't got this) – it provides a robust way to prioritise.

We have also clarified above that housing wasn't a priority but has now moved up our agenda in response to local surveys and Government change in policy.

35 - Please delete as contradictory – please recognise that we don't need to, because of our financial position. We prefer to increase income to fund new things – the recent increases in car parking charges for example.

36 - Add , "however there has been a recent housing needs survey"

See Elaine's point (tie in with above)

41 - Delete 'own' as Wychavon Leisure is independent.

42 - Typical! Please credit this bit of work and list some examples of ones that are effective – e.g. community plan, e-Government strategy. Delete health and safety strategy as the review did not cover this.

43 - add, "because the portfolio holder had very recently made a full statement to Council explaining the problems and actions to address within the housing service"

44 - Last sentence – after 'this resulted in a poor housing service, add "however recent improvements include removing the backlog of housing applications"

50 - It is relevant to include the low number of long-term sick. Something we have no control over?

51 - Add 'and succession/ restructuring arrangements are currently being implemented at top team level'

52 - Add at end, "and £254,000 of planning delivery grant for top performance."

54 - Replace last sentence with, " Members will be considering recommendations from the partnership review soon"

55 - Add supporting people group too.

57 - Points system etc as explained above.

59 - Make it clear this is one example – we list lots of other ways we do PM in self-assessment like through Land and Property Group.

61 - At end add, "and to Members"

66 - At end add, "the 5 year strategy commits the Council to developing service charters for the next financial year, making service standards explicit"

71 - Delete last sentence about 3 people sick. Include ISO 9001 for building consultancy and environmental health

74 – Building Control review is very old – carried out in 2000, with final report dated 2001, so borderline with the 3 year rule. It was not mentioned on site – if it was we would have told you that the improvement plan has been fully implemented and now the service is a regional top performer, rather more than simply ‘noticeable improvements’ We now have a Building Consultancy Service of which we are very proud.

77 - Waste reflects local priority, but we do contribute to waste minimisation – see Public Space self-assessment.

79 - Like Hadzor Hall, the former Worcestershire Hotel site will also provide a mix of tenure as the affordable housing element. 4 will be for social rent, and 12 shared ownership. By providing a mix of tenure, and house types we are providing housing choices for people with different needs and aspirations, and do not accept AC’s assertion that we are not meeting the needs of the community.

The AC suggests that we are below our target of 30%. Our previous local plan policy did not specify the percentage of affordable housing required, but in fact delivered in the order of 10%. We now negotiate on the basis of up to 30%, (rather than a blanket target of 30%). We are required by government policy (Circular 6/98 para.10) to take into account the economics of provision, and whether the provision of affordable housing would prejudice the realisation of other planning objectives that need to be given priority in the development of the site. Additionally, it is important to recognise that on occasions we may agree an amount less than 30% if it results in a better overall house type mix, taking into account the needs of the particular location.

The 30% policy was introduced via our SPG, which was approved in November 2002. Looking at planning approvals post November 2002, the average is actually just under 20% on qualifying sites, and represents a considerable improvement on past performance – see new evidence table (**Ref.6**) in Appendix 2. Affordable housing on Section 106 sites that have actually been delivered in the past year has been on sites that had been approved before the change in our policy.

80 - The shortage of affordable homes reflects the fact that Wychavon is an attractive place to live and work, and demand is therefore high. The shortage of affordable homes is also due in part to the loss of former council homes through the Right to Buy.

91 - Recorded 61 additional affordable homes financially complete in the first 6 months of 2003/04 compared to annual target of 120 additional affordable homes. Performance has in part been affected by the Government’s decision to withdraw ability to recycle LASHG and the Housing Corporation’s decision to withdraw funding for those schemes where first payment not drawn down within three months of grant confirmation. Additionally, there have been unexpected delays in the development programme of the private developers – these aspects are outside the control of either the Council or the relevant Housing Associations. Estimated that a total of 90 units of affordable housing will still be delivered this financial year

S.106 development has not yet met the 30% threshold target – policy only in place since November 2002 and schemes take time to come forward. From Planning Permission approvals since policy adopted, have achieved average of just under 20% on S.106 sites.

100 - now 5 years done (28th October 2003)

110 - delete ‘small’ – largest in Worcestershire and 113k pop is not small.

112 - delete ‘started’ – this is not new.

118 – link this to para 54.

119 - now completed

125 – explain 'high risk of service failure' or delete as not the case.

127 - but can't within Regional and Structure Planning framework. We need to allocate land for 785 new homes by 2011.

131 - We have been working with RSL partners to look at BME issues in relation to housing within the district and ways in which we may improve monitoring. We support the plans by EPHA to undertake specific research in this area and have been involved in encouraging other RSL partners to participate. EPHA has previously worked with the Housing Corporation to undertake research into the needs of travellers within the district.

The lack of robust information on the need for key worker accommodation has been recognised and is a proposed target within the draft Housing Strategy
There is a recognition of the need to strengthen our influence over regional agenda, in partnership with others, and this will be taken forward via the new Housing Strategy.

132 – delete last sentence – repeated too many times.

132/134 - This is not true. Consultation on BVR included RSL partners in relation to operation of the Common Housing Register, visit to Hereford City Council, interviewed LSVT RSL Partners, application tracking exercise, face to face interviews with people on the waiting list to see it from their perspective as well as questionnaire to customers/stakeholders etc

135 – Not true. Wychavon D C was instrumental in developing the sub regional Housing Strategy with other Worcestershire districts, Shropshire and Telford. A lot of cross-authority work does take place. Chief Housing Officers Group, Supporting People, Enabling Group attended by Housing Corporation, workshop with Stratford on Avon in relation to Affordable Housing Issues etc.

It is however accepted that we need to form alliance with other similar authority areas to lobby for regional funding, and to influence housing and planning strategies at Regional level for our priorities as rural authorities.

137 - Average score from GOWM needs to be included. Repeats comments yet again. Padding? Is housing strategy the only criticism?

141 - See comments on para.125.

145 - Point needs to make it clear this relates only to housing.

146 - 5 year strategy sets out aspirations for housing. Member led scrutiny team should be acknowledged here too.

149 - Grant activity is targeted via the Housing Grants & Renewal Policy – targets low income households, vulnerable households, properties at the lower value end of the market in relation to repairs, adaptations, empty homes back into use, energy efficiency, private landlords, aiding early hospital discharge and preventing admissions. See page 53 (page 7) of our self-assessment

Underspend on grants – see comments in respect of 36

150 - Government rule changes, land/construction costs should be mentioned.

152 - SPG need time to impact. Up to 30%.

153 – see 91 comment. Housing Corp not mentioned.

154 - National problem thus Prescott's intervention.

156 - Define failure. What area?

159 - As of November 2003, since stock transfer, 925 new affordable homes have been delivered via the LASHG programme. In addition, new affordable homes have been funded via ADP and a further 12 units as part of planning obligations with no public subsidy. See the attached report (**Ref. 7**) to our 25 November Executive Board on affordable housing in Appendix 2.

162 - Through the O&S meetings, we have engaged with a variety of partners ie RSL partners, Rural Housing Enabler, Developers, Estate Agents.

163 - The comments ignore the new financial reality that we are now in post removal of LASHG regime, and as a result of the Regional Housing and Planning strategies. The AC should recognise that central government has reduced considerably our ability to address the housing needs of the people of Wychavon. (see page 8 or 54 of our self-assessment).

170 - Change to "because of AWM programme coming to an end, the Council has committed it's own resources to the partnerships" and delete comment about funding being uncertain.

174 - Suggest including the £7Million for Canal project, with our contribution £1million.

189 - County contract problems need to be acknowledged

212 - And an Arts Officer!

215 - And £600k for Sports pitch as Pershore High School.

217 - Remove word 'fairly' and 'reasonably' – makes it unclear.

219 - Also in Arts activities. We involve those people that have contact with children in child protection procedures and adopt a sensible, pragmatic approach.

APPENDIX 2: NEW EVIDENCE LIST

Ref.1	Housing Services Net Expenditure 2000/01 to 2002/03 and budgets 2003/04 and 2004/05
Ref.2	Extract from risk register – Planning Services
Ref.3	Further details on Councillor development
Ref.4	Letter about legal position of Pershore Hospital development
Ref.5	5 Year Strategy & draft 2004/05 promises from Executive Board Report on 16 December 2003
Ref.6	Table of Planning Applications of Mixed Housing Sites approved after 21 November 2002
Ref.7	New Affordable Housing since Stock Transfer – 25 November 2003 report to Executive Board