

**Affordable Housing
Supplementary Planning
Document**

Statement of Consultation

July 2014



Wyre Forest District Council

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1. Introduction

1.1 This consultation statement sets out details of the consultation undertaken in accordance with Regulation 13 of the Town and Country Planning (Local Planning) (England) Regulations 2012. The statement sets out who was consulted, when, and how, and summarises the representations received and how they have influenced the Supplementary Planning Document (SPD).

2. Name and Purpose of the SPD

Name

2.1 Affordable Housing Supplementary Planning Document (SPD)

Purpose

2.2 The aim of this SPD is to help to meet housing needs and create mixed, balanced and sustainable communities by maximising the delivery of affordable housing. The SPD sets out how the District Council's affordable housing policies should be interpreted. This will provide certainty and clarity for those bringing forward development within the District. Wyre Forest District Council's Development Plan is made up of the Adopted Core Strategy (2010), the Site Allocations and Policies Local Plan (2013) and the Kidderminster Central Area Action Plan (2013). The following District Council planning policies relate to the delivery of affordable housing:

- Adopted Core Strategy - CP04 – Providing Affordable Housing
- Site Allocations and Policies Local Plan – SAL.DPL2 – Rural Housing
- Site Allocations and Policies Local Plan - SAL.DPL3 – Financial Viability

2.3 The Affordable Housing SPD has been prepared to provide more detailed guidance on the District Council's expectations for the delivery of affordable housing in accordance with these policies. It explains how developers, landowners and Registered Providers (RPs) should interpret the District's affordable housing policies.

2.4 The District Council adopted a Planning Obligations SPD in February 2007. This document sets out detailed guidance on developer contributions in relation to a number of topics including affordable housing. The Affordable Housing SPD replaces Section 4 of the Planning Obligations SPD. The Council also published an Affordable Housing Toolkit in April 2011. The Affordable Housing SPD also replaces the toolkit.

3. Who was consulted on the SPD?

3.1 The consultation was targeted towards those organisations and individuals with an interest in affordable housing. Appendix 1 lists those organisations consulted and this includes statutory consultees set out within Regulation 4 of The Town and Country Planning (Local

Planning) (England) Regulations 2012. A collaborative approach has been taken to preparing the SPD. Colleagues within Housing Services, as well as other Council departments, have been directly involved with the preparation of the SPD.

4. How Were People Consulted?

4.1 The consultation period ran from 3rd April to 16th May 2014. A draft SPD was prepared made available on the District Council's web-site and in the Wyre Forest Customer Service Centre, Kidderminster as well as at Kidderminster, Stourport-on-Severn and Bewdley libraries. Notification letters were sent to those parties set out at Appendix A to arrive in time for the start of the consultation. The draft SPD was also made available on the District Council's consultation portal to allow representations to be made electronically. A press release was prepared to mark the start of the consultation and this was shared on the District Council's Facebook and Twitter accounts.

5. Summary of Responses

5.1 A total of 43 representations were received from 12 respondents. Of these, 9 responses were from organisations and 3 were from individuals.

5.2 All of the responses were either in support of the SPD or raised comments in relation to its proposed content. No objections to the SPD were received.

5.3 Summaries of all representations received and the District Council's response to each one can be found in Appendix B.

6. Summary of the Main Issues Raised

6.1 The table at Appendix B sets out a summary of the representations received.

7. How have those Issues been addressed in the SPD?

7.1 The table at Appendix B sets out how each of the comments made has been considered within the Draft SPD.

Appendix A: List of Consultees

Specific Consultees

Wyre Forest District Parish/Town Councils

Bewdley Town Council
Broome Parish Council
Chaddesley Corbett Parish Council
Churchill and Blakedown Parish Council
Kidderminster Charter Trustees
Kidderminster Foreign Parish Council
Rock Parish Council
Rushock Parish Council
Stone Parish Council
Stourport-on-Severn Town Council
Upper Arley Parish Council
Wolverley & Cookley Parish Council

Adjacent Parish Councils

Abberley Parish Council
Astley & Dunley Parish Council
Bayton Parish Council
Belbroughton Parish Council
Clent Parish Council
Clebury Mortimer Parish Council
Dodford with Grafton Parish Council
Elmbridge Parish Council
Elmley Lovett Parish Council
Hagley Parish Council
Hartlebury Parish Council
Highley Parish Council
Kinlet Parish Council
Kinver Parish Council
Milson & Neen Sollars Parish Council
Pensax Parish Council
Upton Warren Parish Council

Other Specific Consultees

British Telecom
Bromsgrove District Council
Central Networks
Dudley Metropolitan Borough Council
English Heritage
Environment Agency
Greater Birmingham and Solihull Local Enterprise Partnership
Hereford & Worcester Ambulance Service
Hereford & Worcester Fire & Rescue Service
Highways Agency
Homes & Communities Agency
Malvern Hills District Council

Mobile Operators Association
National Grid
Natural England
Network Rail
Office of Rail Regulation
Oil and Pipelines Agency (The)
Severn Trent Water Ltd
Shropshire Council
South Staffordshire District Council
South Staffordshire Water Plc
South Worcestershire Development Plan
Staffordshire County Council
Staffordshire Police Authority
The Coal Authority
The Planning Inspectorate
Transco West Midlands Local Distribution Zone
West Mercia Constabulary
Western Power Distribution
Worcestershire County Council
Worcestershire Local Enterprise Partnership
Wychavon District Council

General Consultees

Organisations registered in the Planning Policy database including:

- agents
- developers
- education and youth groups
- housing interest groups
- land owners
- local interest groups
- registered providers
- service providers

Organisations/Individuals that made responses relating to housing at the various consultation stages for:

- Core Strategy
- Site Allocations & Policies Local Plan
- Kidderminster Central Area Action Plan

Appendix B: Consultation on Draft SPD - Summary of Representations Made and Officer Responses

Name	ID	Summary	Officer Response
Bond Mr D	DAHSPD1	Suggests the land owned by Chester Road Land Society as a potential location for affordable housing.	Comments are noted however, the SPD can not allocate land for development; it can only set out detailed guidance to support the implementation of existing planning policies. The land owner will need to put their suggestion forward for the next Strategic Housing Land Availability Assessment call for sites later this year.
Phillips J	DAHSPD2	Suggests that new affordable housing developments (except flats) should be conditioned to have their allocated parking provided within the curtilage of the property to prevent visitors using or blocking allocated parking spaces.	Comments are noted. The Affordable Housing SPD will not set out detailed parking requirements as this is a matter for the County Council to address through their Local Transport Plan and through their comments on individual planning applications. Current guidance on the location and design of parking for residential developments is set out within the County Council's Highways Design Guide.
Wyre Forest District Council	DAHSPD3	I understand that in the design chapter reference has been made to the Council's Core Strategy CP01. I would welcome reference to CP02 (Water Management) too as this addresses SuDS requirements for new developments more specifically.	An additional cross reference to policy CP02 of the Adopted Core Strategy will be included within the SPD.
Worcestershire Regulatory Services	DAHSPD4	In respect of contaminated land we have no further comments.	Comments are noted.

Name	ID	Summary	Officer Response
Worcestershire Regulatory Services	DAHSPD5	Recommends that a number of sustainable options including EV charging points, secure cycle facilities, low nitrogen oxide boilers and travel plans are included within new developments.	Comments are noted. The SPD includes a cross-reference back to Adopted Core Strategy policy CP01 which sets out the requirements for sustainable design.
Hurcott Land Owners	DAHSPD6	Promotes land bounded by Birmingham Road, Hurcott Lane and Hurcott Road, of approximately 40 acres, for residential development.	Comments are noted, however the SPD can not allocate land for development, it can only provide more detail to support the implementation of existing policies. The land owner will need to put their suggestion forward for the next Strategic Housing Land Availability Assessment call for sites later this year.
Environment Agency	DAHSPD7	Supports the existing cross reference to policy CP01 but suggests additional cross references to policy SAL.CC7 (Water Management), and the emerging Design Quality SPD and Sustainability Checklist.	Comments are noted and support is welcomed. An additional cross reference to SAL.CC7 will be included. The District Council is no longer intending to prepare a sustainability checklist with issues being picked up through a review of the Design Quality SPD and the national Housing Standards Review instead. A cross reference to relevant design policies will be included.
English Heritage	DAHSPD8	Suggests that wording is included in Chapter 8: Design and Construction to ensure that where affordable houses are considered, the impact on heritage assets, their significance and settings, design and the historic fabric of buildings is considered in accordance with the NPPF and Local Plan policies.	Comments are noted. A reference to the relevant design policies has been included.
Homes & Communities Agency	DAHSPD9	The Homes and Communities Agency (HCA) is the owner of land at the Former Lea Castle Hospital Site, Kidderminster.	Comments are noted. However, it is considered that paragraph 5.9 of the Draft SPD provides clear examples of what are considered to be “exceptional circumstances” for off site provision of affordable

Name	ID	Summary	Officer Response
		<p>The site is subject to Policy SAL.PDS1 of the Site Allocations and Policies Local Plan. The policy states that, as a minimum, the District Council will require development proposals to "make a financial contribution to the provision of affordable housing off-site in accordance with the adopted Core Strategy Policy CP04". Policy CP04 of the Core Strategy does not explicitly refer to offsite affordable housing provision, referring instead to the Council securing a smaller contribution towards affordable housing where the typical level of affordable housing provision is proven to undermine the viability of development. However, Policy SAL.PDS1 is nevertheless clear that such offsite affordable housing provision will be considered favourably as part of the development of the Former Lea Castle Hospital Site.</p> <p>The Draft Affordable Housing SPD (that is the subject of this consultation) states that affordable housing can only be provided off-site in 'exceptional circumstances'. Such circumstances are not clearly defined (though paragraph 5.4 suggests that off-site provision will be allowed where on-site provision is not feasible or viable). However, in the context of the wording of adopted Policy SAL.PDS1, such 'exceptional circumstances' must apply to, and therefore include, the development of the Lea Castle Hospital site.</p> <p>The HCA is therefore of the view that the Affordable</p>	<p>housing and that it should not specify specific sites to which this would apply.</p> <p>Policy SAL.PDS1 of the Site Allocations and Policies Local Plan sets out the policy framework for acceptable uses for the future redevelopment of the Former Lea Castle Hospital site. The emphasis is clearly focussed on a mixed use development, which allows for C3 dwelling uses as part of the mix to enable the development of the site.</p> <p>Paragraph 5.9 of the Draft SPD states: "Examples of circumstances where it may not be possible to provide affordable housing on site include sites where it would be difficult to achieve a mixed scheme and sites with particular site and layout constraints."</p> <p>For clarification purposes it is considered that the word "use" could be inserted to read "Where it would be difficult to achieve a mixed use scheme."</p>

Name	ID	Summary	Officer Response
		<p>Housing SPD should clearly reference the potential for the delivery of off-site affordable housing where other site specific policies apply. However it should also provide that on-site delivery is an option for developers should this be considered a more viable approach.</p>	
West Midlands HARP Planning Consortium	DAHSPD10	<p>In paragraph 5.2 the Council have stated need for more affordable housing to meet their current deficit but have still advanced a lower target. We acknowledge the rationale behind the lower figure and agree that the higher target is unachievable, but the Council need to proactively pursue any means to increase this housing figure and consideration needs to be given to suggestion that may promote more affordable housing.</p>	<p>Comments are noted. The target for affordable housing within the District and the threshold and percentage requirements are firmly established within existing adopted planning policies. However, the target is not a maximum figure and the District Council supports the delivery of sites which provide higher levels of affordable housing including those delivering 100% affordable housing.</p> <p>2013/14 saw a large increase in the delivery of affordable housing schemes across the District with 163 new affordable dwellings completed.</p>
West Midlands HARP Planning Consortium	DAHSPD11	<p>Following the need for a more unrestrained pipeline of affordable housing a more liberal rural exception policy would be advisable. We disagree with the Councils limitation of 20% in terms of allowing cross subsidy market housing, we would advise that the Council changes the wording so a majority of homes on the rural exception scheme are affordable, viability pending. This may allow particularly burdensome sites to come forward, which would otherwise be undeliverable.</p>	<p>Comments are noted. The allowance for market housing to cross subsidise rural exceptions sites is established within the NPPF. The Site Allocations and Policies Local Plan establishes that in such cases a maximum of 20% of the dwellings provided should be market housing and these must be supported by robust viability appraisal. This policy was tested and subject to scrutiny by a Planning Inspector during the Examination In Public in early 2013 and was found to be sound. The SPD can not amend this existing position.</p>

Name	ID	Summary	Officer Response
West Midlands HARP Planning Consortium	DAHSPD12	We would also question the wisdom of restricting rural exception sites to nine dwellings. Rather than enforcing an arbitrary figure to restrict affordable housing delivery there should be proportionality in allowing larger settlements to cater for greater development.	Comments are noted. The Site Allocations and Policies Local Plan establishes the need for rural exception sites to be small scale developments. The SPD provides greater clarity on this by defining it within the terms of minor and major planning applications.
West Midlands HARP Planning Consortium	DAHSPD13	We would also take this opportunity to highlight to the Council potential central government legislation that will see the affordable housing threshold set at 10 dwellings. Though we are unsure of the exact status of this legislation at present it may be prudent to do some exploratory work on this target and the effect it may have on the delivery of affordable housing over the plan period.	Comments are noted. The District Council's affordable housing thresholds are established within the Adopted Core Strategy. The legislation referred to would have an impact on this; however, it is not yet clear whether or not it will come into force and the timescales for implementing it should it be progressed. Therefore, the SPD assumes that current planning policies will remain in force and provides detailed guidance for their implementation. The District Council submitted comments to central Government on the consultation regarding the potential impact on the delivery of affordable housing within the District.
Worcester City Council	DAHSPD14	Could signpost Appendix C which repeats the policies.	Include a signpost to Appendix C.
Worcester City Council	DAHSPD15	Downsizing is not a continuous process - as households change through their lifecycle. Some have needs for larger accommodation as families form and grow.	Comments are noted, however for clarification purposes, paragraph 2.9 refers specifically to the increase in households wishing to downsize as a result of the changes brought about by the Welfare reform Act.

Name	ID	Summary	Officer Response
Worcester City Council	DAHSPD16	Para 2.12 - and 5.4 What are the implications of government approach regarding precluding seeking affordable dwellings on sites of less than 10 dwellings (eg for the implementation of policy at Bewdley and the rural areas (App 3 (where the threshold is lower at 6 dwellings.))	<p>Comments are noted. It is not yet, and may not become, Government policy to preclude a requirement for affordable housing on sites of fewer than 10 dwellings. Indeed the District Council has submitted a consultation response to Central Government with regard to the potential impacts on affordable housing delivery on smaller scale sites.</p> <p>The District Council's adopted policy is to seek affordable housing on sites of 6 dwellings or more within Bewdley and the rural areas. The Affordable Housing SPD can not change the affordable housing thresholds which are in place. Any Government changes will need to be addressed through the plan review which is scheduled to commence with an Issues and Options consultation in Summer 2015.</p>
Worcester City Council	DAHSPD17	Smaller sites could still deliver affordable housing eg if put forward as rural exceptions, Right to Build, developed by Registered Providers as 100% affordable housing.	Comments are noted, paragraph 2.13 and 2.14 will be merged to clarify that sites below the threshold may still provide affordable housing, particularly in the rural areas where there is a specific focus on delivering affordable housing.
Worcester City Council	DAHSPD18	Suggests that the last two sentences of paragraph 2.16 could be expressed in a positive way.	Comments are noted and the wording will be revised accordingly.
Worcester City Council	DAHSPD19	Suggests that the background evidence set out in Chapter 3 is not required and cross references should be provided to the District Council's evidence base instead. Suggests that updates to evidence base	Comments are noted, however, it is considered that the evidence set out within the SPD sets out valuable context to the District's local circumstances and therefore, it will be retained within the document.

Name	ID	Summary	Officer Response
		should be placed in a separate evidence base document to which the SPD can then refer.	
Worcester City Council	DAHSPD20	Para 3.19 is potentially confusing, as Policy CP04 does not set a target of 30% of the Plan's housing provision requirement should be affordable housing. CP04 is to seek 30% affordable housing on the qualifying sites (ie those above the policy threshold).	Comments are noted, however, paragraph 7.10 of the Adopted Core Strategy establishes a target of 60 affordable dwellings per annum which is approximately 30% of the overall housing target. Therefore, it is considered that the wording of paragraph 3.19 is appropriate.
Worcester City Council	DAHSPD21	Is there a relevant density policy In a DPD? - if so this could be quoted; if not is the Council relying on NPPF?	Comments are noted. A reference to policy CP05 of the Adopted Core Strategy and Design Quality Supplementary Planning Document will be included.
Worcester City Council	DAHSPD22	Para 5.6 refers to Tenure Mapping - where can the reader find this evidence?	Tenure mapping can be found on the District Council's web-site.
Worcester City Council	DAHSPD23	Table 5.0.2 - this is evidence (and it would benefit from indicating the date of the information, and the information source).	Comments are noted. The sources are set out within the footnotes on page 18.
Worcester City Council	DAHSPD24	First 2 bullet points could be expressed to indicate more strongly that generally flats and smaller scale sites are still expected to deliver affordable housing on-site, and that it is only exceptionally that off-site contributions will be appropriate.	Comments are noted however, the preceding paragraphs are clear that off-site provision is for exceptional circumstances only. The bullet points set out examples of where this may be the case.

Name	ID	Summary	Officer Response
Worcester City Council	DAHSPD25	Could also make clear that the use of the payments would be in accordance with the uses specified in the Legal Agreement (S106). This paragraph could helpfully signpost the model S106 Agreement clauses set out in Appendix B of the draft SPD.	Comments are noted. The wording will be amended accordingly and a cross-reference to Appendix B will be inserted.
Worcester City Council	DAHSPD26	Para 1.9 refers to the Planning Obligations SPD, but it would be helpful to include an additional sentence at the end of the paragraph to remind the reader that there could be other planning obligations sought in addition to that for affordable housing, and to signpost the Planning Obligations SPD.	Comments are noted. An extra sentence will be inserted to clarify this.
Worcester City Council	DAHSPD27	Considers that this section should give details of the information which the District Council will require in relation to viability.	Comments are noted however this information is set out within Appendix C to the Site Allocations and Policies Local Plan, a cross reference to this is already included within paragraph 6.1.
Worcester City Council	DAHSPD28	What is the evidence to justify the 20% limit of enabling market development?	The 20% figure is set out within paragraph 4.26 of the Site Allocations and Policies Local Plan and was fully tested at examination during early 2013 and found sound by the Planning Inspector.
Worcester City Council	DAHSPD29	<p>Further guidance on rural exceptions would be helpful</p> <ul style="list-style-type: none"> • Need to give further guidance on local occupancy ie what is meant by "current residents" , "existing family" and employment connections" (as referred to in the definition or rural exception) • Need to set out what the Council means by 	The definitions around local connection are set out within the Allocations Policy and Local Connection Policy and as these documents can be updated on a more regular basis it is not considered appropriate to include the definitions within the SPD itself. A cross reference to the Site Allocations and Policies Local Plan will be included within paragraph 5.19.

Name	ID	Summary	Officer Response
		affordable housing being available in perpetuity (as referred to in the definition of rural exception)	Perpetuity would be defined within each individual legal agreement with the developer and may vary slightly depending on the location and type of affordable housing.
Worcester City Council	DAHSPD30	The sentence "additionally, where exception sites are solely for the provision of affordable housing the policy also makes provision for some limited enabling market housing to make the development viable" is unclear. Whilst exception sites are intended solely for affordable housing, the policy allows in exceptional circumstances for the provision for some limited enabling market housing on site to make the development viable.	Comments are noted. However, policy SAL.DPL2 of the Site Allocations and Policies DPD makes provision for housing to meet an identified local need to come forward on exception sites. There may be instances where the housing is market housing to meet a specific need identified within the Local Housing Needs Survey, examples of this may be small starter homes or homes suitable for elderly people wishing to downsize. Within this context, it is considered that the sentence referred to is sufficiently clear.
Worcester City Council	DAHSPD31	Chapter 5 could usefully refer to and expand on the following a) the potential for Neighbourhood Plans to provide further policy and proposals regarding affordable housing sites. b) the opportunities from Community Right to Build to deliver affordable housing.	Comments are noted. Insert an additional sub-section within chapter 5 to draw attention to the potential for Neighbourhood Plans and Community Right to Build Orders to deliver affordable housing.
Worcester City Council	DAHSPD32	HCA grants - grants may be available if there is additionality.	Whilst it is noted that HCA grants may be available in certain circumstances on s106 this would be unlikely except on a very small number of sites and would not

Name	ID	Summary	Officer Response
			be something which the District Council would actively pursue due to the requirement of grant funded sites to be affordable rent rather than social rent.
Worcester City Council	DAHSPD33	This is evidence. Need to state the source and date of this evidence, and indicate where the evidence from any review of this data will be published.	Noted and agreed. The source will be cited within the final version of the SPD.
Worcester City Council	DAHSPD34	What is the source of these standards, could they be subject to change?	These standards are the minimum requirements for new homes in receipt of HCA grant funding. The standards have been amended in response to the Housing Standards Review and the updated standards have been included within the SPD.
Worcester City Council	DAHSPD35	<p>Is there guidance on housing mix eg</p> <ul style="list-style-type: none"> • Dwelling size, tenure, type (houses , flats), • Mix within a site <p>Will development be "tenure blind"?</p> <p>Does the Core strategy include a policy on design? - if so the SPD should signpost this policy.</p>	<p>Comments are noted. The exact dwelling mix would be agreed with developers on a case-by-case basis as it will vary depending on the need identified. Additional wording will be inserted within paragraphs 5.6-5.7 to further clarify this.</p> <p>Paragraph 8.1 is already considered to be sufficiently clear in relation to the requirement for development to be tenure blind.</p>
Churchill and Blakedown Parish Council	DAHSPD36	Churchill and Blakedown Parish Council broadly supports the policy principles behind the Draft Affordable Housing SPD.	Comments are noted and support is welcomed.

Name	ID	Summary	Officer Response
Churchill and Blakedown Parish Council	DAHSPD37	<p>Raises concern that Churchill and Blakedown Parish falls within postcode sector DY10 3 which is identified as Kidderminster within Table 3.0.2 but is rural in terms of planning policy. Suggests that waiting list figures should be separated out.</p> <p>Also raises concern that households can be included in more than one waiting list if they have no preference on location and this can distort need. Refers to the recent development of 19 affordable housing units within Blakedown and suggests that there is no more deliverable space within the Parish given its Green Belt location.</p>	<p>Unfortunately, waiting list data is not easily available at Parish or ward level, therefore, a caveat has been included within the document to state that the figures are indicative.</p> <p>The allocations system enables the applicant to identify a specific parish they wish to be rehoused in and whether they have a local connection to that parish. More people can specify wanting to live in that area but wouldn't be considered without the connection as per our Local Connection Policy. It is unlikely that all needs will have been met by the recent development but a Housing Needs Survey will be undertaken during 2014/15 to identify any new need arising.</p>
Churchill and Blakedown Parish Council	DAHSPD38	Reiterates the need for an updated Housing Needs Survey to be undertaken for Churchill and Blakedown Parish to inform the emerging Neighbourhood Plan for the Parish.	Comments are noted. These issues will be considered as a part of the Neighbourhood Planning process. A housing needs survey is required to inform the development of neighbourhood specific planning policies.
Churchill and Blakedown Parish Council	DAHSPD39	Raises concern that the District's Local Letting Policy is only applied to the first letting of a new build property which does not protect locally connected people sufficiently. The Parish Council requests clarification as to how the Local Lettings Policy will be applied within the Parish.	The local connection policy relates to new build lets but a Local Letting Plan can be developed with the Registered Provider that would specify what happens to subsequent lets as long as it is included in s106 agreement but this can not be applied retrospectively unless the RP agrees. We would not use it where it affected the ability of Registered Providers to access funding from financial institutions.

Name	ID	Summary	Officer Response
Churchill and Blakedown Parish Council	DAHSPD40	<p>The Parish Council is concerned about the apparent trend towards previously rented housing being sold off as shared ownership as a matter of course where the property requires refurbishment following the end of a long-term tenancy. Suggests the SPD's purpose is to increase affordable housing units, yet shared ownership is complex and less attractive. Refers to the fact that not all of the new shared ownership units recently completed within the parish have been sold and suggests that any further conversion to shared ownership within the Parish should be discontinued but where it does occur the full Local Lettings Policy should apply (including the perpetuation of the local connection for subsequent shared ownership).</p>	<p>All of the Registered Providers have disposal and conversion strategies in place and have to do so in order to access HCA funding for new build. The District Council is unable to influence these strategies as the organisations are separate entities but support disposal and conversion where funds are then invested in the provision of additional units where the design and build standard is likely to be of a higher quality. Shared ownership is a tenure the Council support and recognise the need for (around 30% of households in need require this type of tenure in Wyre Forest).</p> <p>As mentioned above conditions around disposals of existing stock can not be applied retrospectively but our Registered Providers do seek to sell where possible to households with a local connection.</p>
Churchill and Blakedown Parish Council	DAHSPD41	<p>All future Shared Ownership leases in Churchill and Blakedown, including on any previously rented properties, should be HCA Rural Restricted Leases, so that they remain in the social housing arena in perpetuity, even when staircased to 100%. The full Local Lettings Policy should apply to Shared Ownership. If it is not possible to find suitably qualifying purchasers within a reasonable period (say 6 months as per the operation of the Local Lettings Policy), any property intended for Shared Ownership should first revert to full rental under the Local Lettings Policy, before ignoring Local Lettings Policy and selling to an unconnected person, on the grounds</p>	<p>It has not been acceptable to the Council to use the HCA rural restricted leases without imposing some additional conditions and it is likely we would continue to do this.</p> <p>It would not be possible to move from shared ownership to rented due to restrictions imposed by funders and this being economically unviable.</p>

Name	ID	Summary	Officer Response
		that the demand for Shared Ownership in the Parish is satisfied.	
Churchill and Blakedown Parish Council	DAHSPD42	In summary, (a) Wyre Forest Local lettings Policy should be revised to ensure subsequent lets and Shared Ownership are fully included, and (b) current rural rented housing stock should be ring-fenced to meet the local need. In the absence of any more deliverable sites in our Parish for development following the Blakedown Nurseries site, any affordable housing obligation in the Parish should be commuted to off-site contributions for other areas until other identified local housing needs are satisfied.	Comments are noted. Please see feedback to the individual detailed comments.
Severn Trent Water Ltd	DAHSPD43	We will endeavour to work closely with Wyre Forest District Council to identify any water issues that may cause concern in your area. Even though the sewerage infrastructure is in place we would need to model the impact of any additional development to ensure that we prevent any future capacity issues, however at this stage we will need a degree of certainty that the development sites are going ahead before we can commit to this.	Comments are noted and support is welcomed. Severn Trent Water will continue to be consulted on development proposals.