
improving living in scotland



**RESPONSE TO ABERDEEN CITY COUNCIL
DRAFT SUPPLEMENTARY GUIDANCE**

30 January 2017

ABOUT HOMES FOR SCOTLAND

Homes for Scotland is **the** voice of the home building industry.

With a membership of some 200 organisations together providing 95% of new homes built for sale in Scotland each year as well as a significant proportion of affordable housing, we are committed to improving the quality of living in Scotland by providing this and future generations with warm, sustainable homes in places people *want* to live.

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PROCESS

Homes for Scotland represents members on a wide range of issues affecting their ability to deliver much needed homes.

Our views are endorsed by committees and advisory groups utilising the skills and expertise of key representatives drawn from member companies.

This response has been discussed and agreed by the Homes for Scotland Grampian Home Builders' Committee.

1. PLANNING OBLIGATIONS

Section 2 – Introduction to Topic

- 1.1 Homes for Scotland support's the planning authority's aspirations within the first paragraph of Section 3 to "avoid deterring development by making reasonable demands..." as we recognise the need to encourage the delivery of new homes, acting as a facilitator for development rather than a blocker. However, it is not possible, from reading this draft Supplementary Guidance, to calculate planning obligations for a potential development, and it is therefore not possible to determine whether, cumulatively, the Council's demands will be "unreasonable". Greater clarity on the definition of "unreasonable demands" would be useful, as would the provision of a robust evidence base for all costs. We suggest that more up-front information would be useful to the home building industry to calculate costs up-front. Para 3.3 does suggest that "upfront identification of likely contribution requirements should be sought to input to development appraisals", but the draft guidance does not set out how this might be sought. If it is not possible to set out all costs at the outset within the Supplementary Guidance and Action Programme, we would like to see wording to encourage and support earliest possible engagement with the planning authority, and a commitment from the authority to engage with the developer to identify likely contributions at this stage.
- 1.2 Homes for Scotland and our Members have engaged with Aberdeen City Council in the preparation of a S75 Legal Agreement template in 2016. We note that there is no reference to this template in the draft Guidance. If the planning authority expects the template to be used for all Section 75 agreements, we suggest that this template should be referred to within the Supplementary Guidance. We would also suggest that this also makes reference to the fact that the template is a starting point for all Section 75 negotiations and that each application will be taken on its own merits.
- 1.3 We dispute the statement in the final paragraph of page 1 of the draft guidance which states that the "burden of additional infrastructure, facilities and services that are related to the development are absorbed by the landowner and developer, and not by the Council or other public service provider". We are disappointed to see that the Council does not accept any shared responsibility for the delivery of development and services in Aberdeen. The home building industry accepts the need to contribute towards infrastructure, facilities and services directly relevant to the proposed development

Section 3 – Developer Contributions

- 1.4 In section 3.1, we do not agree with the Council's proposed method of management of funds. We consider that contributions should be held separately for each development, and ring fenced to ensure that monies are only used for the intended purposes and can be returned if they are not spent within the relevant timescales.
- 1.5 We challenge the increase in the timescales for the Council to spend money gained through the legal agreement process from 5 to 7 years of the date of final payment for phased S75 agreement developments in section 3.1 para 3. A 5 year period has been standard as part of the currently adopted Supplementary Guidance, and if it is not spent within this time, it is returned to the developer. An increase to 7 years from final payment seems too long a timescale given that the Council will have been collecting payments for a number of years up to the point of final payment on larger sites. We question whether this will be justifiable in terms of Circular 3/2012.
- 1.6 We also query the addition of an “additional administrative cost” to be funded through 9% annual interest to cover monitoring and management of developer obligation funds. We suggest this is removed, and the interest accrued on developer obligation funds should be used towards the cost of the required infrastructure.
- 1.7 Homes for Scotland supports the statement within para 2 of section 3.2 that planning conditions should be used "wherever possible" in the first instance, before considering the use of planning obligations. We are content that the applicant should be responsible for their own legal costs, but do not consider that an additional cost should be incurred for preparing and registering the Planning Obligation – this should be part of the planning application fee.
- 1.8 We are concerned about the use of BCIS for indexation (as set out in section 3.3, para 5) where CPI/RPI are the generally accepted approaches. The BCIS index is not publically available, and has a cost implication. It also does not align with house price increases, and is a volatile index that increases and decreases. We question how this will operate if not all parties have access to the BCIS index which is not publicly available as it has a cost implication.

Section 4 – Obligations

- 1.9 In terms of Section 4, Table 1, Homes for Scotland questions the legitimacy of healthcare contributions as part of the suite of developer obligations sought for new housing developments. We also suggest that Regional SUDS is deleted from this table to ensure that there is no suggestion that this is obligatory. Further details on these obligations is set out below.

- 1.10 In Section 4, Table 2, we disagree with the inclusion of the "Supported Bus Services" as a type of mitigation. We do not believe that the home building industry should be required to fund a new bus service or to underwrite a new service for an agreed period of time. Bus companies as commercial businesses should bear the cost of setting up a new bus service which will, in time, make a profit for the business through paid use of the service. Furthermore, in Table 2 we dispute the inclusion of payments per residential unit for bus permits and car club provision, which could add an additional £1,000 per residential unit to the legal agreement cost. We would like to see evidence provided to support the addition of these costs to the suite of developer obligations. It should be noted that, through the delivery of new homes, developers are creating a customer base for bus and car club operators, and therefore should not be required to subsidise any private business operation.
- 1.11 While Homes for Scotland welcomes the principle of regional SUDS, we query the clarity of the developer obligations here. We suggest that text is amended or added to be clear that contributions towards regional SUDS will only be required if a developer opts for that means of mitigation, rather than on-site provision. Paragraph 4.3.2 already states that developers have a choice to opt in to a regional SUDS. Regional SUDS should also be deleted as a type of obligation within Table 1 on page 4 to ensure it is not seen as an obligatory contribution.
- 1.12 Homes for Scotland suggests that Pages 12 and 13 are not clear as to the land value cost – “where a contribution is required for new build provision a proportionate land value element will also be sought as this forms part of the overall project cost”. Our members have concerns that this could be read as the entire site being transferred at nil cost. This should not be the case, and a proportion of the cost must be met by the Council. While the development will add pupils to the new school, the school will also serve existing areas as well for the majority of schools. The home building industry requires certainty that the value of land provided to the Council will be offset against the required financial contribution for education proportionally to the impact of development.
- 1.13 We request a justification for the size of land required for schools, set out in Page 13. We note that a land requirement has not been provided for a 1,000 pupil capacity secondary school, although Page 12 gives a required mitigation of a new build (1,000 pupil; capacity) secondary school and relevant rate per pupil. Where there is a requirement for land to be provided that is “serviced at the developer’s expense” we suggest that it is made clear that this will only be services to the boundary of the site, and no more.
- 1.14 We also note that the figure per pupil for schools has increased considerably. We request that the justification for this is clearly set out within a Technical

Advice Note or within this guidance to reassure applicants as to the reason for this increase.

- 1.15 With regard to 4.5 Healthcare Facilities, Homes for Scotland does not agree in principle with the inclusion of healthcare provision as part of developer obligations. As private businesses, it is not for the developer to subsidise these healthcare businesses. Healthcare is funded by central government through taxation and it is inappropriate to expect the NHS to be subsidised by the development industry. We suggest that if these contributions are to continue, that a mechanism is built in to allow for a refund of monies from the private medical practices to the public sector (NHS) should they be sold in the future, to prevent these private businesses benefitting from finding specifically designed to support healthcare facilities in that area.

General Comments

- 1.16 Homes for Scotland is concerned about the scale of developer obligations across Scotland where the cumulative effect of all individual obligations results in unacceptably high totals which threaten the viability of some developments. We consider that the scale of contributions should be reviewed in Aberdeen City to provide a robust evidence base and clear justification for costs, as required by Circular 3/2012. This information is required to provide transparency to the process and certainty to developers. The Local Development Plan and its Supplementary Guidance aims to deliver more homes in Aberdeen, and promote economic growth. It can only do this if those investing in the north east have certainty over the scale of costs associated with the delivery of a development.

2. AFFORDABLE HOUSING

Introduction to Topic

- 2.1 Homes for Scotland encourages early engagement between the planning authority and applicant to negotiate and agree affordable housing contributions. We are happy to be engaged with Aberdeen City Council on the Affordable Housing Forum, and see the meetings as a useful engagement between the home building industry and the Council, and a positive example of the public and private sector working collaboratively together to support the delivery of affordable housing.
- 2.2 We are pleased to see mention of over provision or banking of affordable housing mentioned within the Supplementary Guidance as a direct result of positive engagement between ourselves and the planning authority. We would like to see additional wording added to the Supplementary Guidance to encourage and support "affordable housing credits" as a means of delivering affordable housing. We refer to the internal guidance used by Perth and Kinross Council planners (attached for reference at Appendix 1) which details the affordable housing credit process. Perhaps some text from this note could be repurposed for use in this guidance to provide further detail on this as an option, whilst still allowing flexibility. We suggest that a more positive form of wording could be used in the final paragraph of Section 3 which is the first time the over provision or banking is mentioned in the guidance to set it out more positively as an option.

Section 3 – Affordable Housing Provision

- 2.3 We welcome the scope for off-site provision of affordable housing within Section 3. Homes for Scotland Member feedback has been positive on this type of provision, and suggests that there may be increased opportunities for Registered Social landlords through this delivery mechanism as the site is sourced by the private sector and is delivered in partnership with the private sector. We suggest the wording in the draft guidance is amended to reflect this.
- 2.4 We query the use of "and then" in the list of delivery methods of affordable housing, suggesting it is a cascade method. We note that On-site provision is the preferred method but do not consider there should be a cascade method for the remaining delivery methods and suggest more clarification is needed here.
- 2.5 With regard to the requirement to have an agreement in writing in advance of the submission of a planning application to change the required contribution for an application through the overprovision/banking method could be more flexible to allow for opportunities to be taken through the course of the planning application process.

Section 4 – Possible Categories of Affordable Housing

- 2.5 Homes for Scotland does not agree with the use of sub-market areas at all for Aberdeen City, as Aberdeen City itself lies within one larger housing market area, and we do not deem it appropriate to divide the area into sub-market areas. There has been no consultation on these sub-market areas and these areas do not form part of the Strategic Development Plan.
- 2.6 Homes for Scotland does not agree that there should be a “preferred hierarchy” set out within section 4.1 of the guidance. The tenure of affordable housing should be decided on a site by site basis, taking into consideration the individual characteristics of that site, and local need. We acknowledge the current challenges in securing funding for the delivery of affordable housing, and recognise the role of the private home building industry in supporting delivery of affordable homes through delivery of market housing. We do not support the sequential approach to the methodology for securing affordable housing contributions, and feel that this is at odds with the need to overcome current challenges to securing funding for the delivery of affordable housing.
- 2.7 In the final paragraph of section 4.4, we query the assumption that planning obligations will be always be planned into the development. Through the planning obligations supplementary guidance it is not always clear upfront what the costs will be for the suite of developer obligations. We query this paragraph in terms of its potential impact on the delivery of affordable homes.
- 2.8 We suggest that clarification is added to paragraph 4.5 to be clear that this Developer Viability Statement is only required where a challenge on the grounds of viability is being made.
- 2.9 Homes for Scotland considers that a text should be added to paragraph 4.6 to note that it is not only in the instance that affordable housing is not viable on site, but also in the instance when there is a greater benefit to the Council in having affordable housing units delivered elsewhere. For example, more affordable housing units may be able to be provided elsewhere within Aberdeen (not on a sub-market basis).
- 2.10 Within the numbered criteria of paragraph 4.6 we again reiterate our comments on sub-markets under number 2. We suggest that there may be merit in affordable housing provision beyond the single sub-market area, and that any limitations to a sub-market area may have implications for deliverability of affordable homes across Aberdeen City. Under number 4, we do not consider that it is always feasible for the site to be transferred to the RSL or Council prior to the delivery of any units on the primary site, and there should be flexibility built in here.

- 2.10 In Section 4.7 we do not consider that the over provision and banking should be tied to sub-market areas, and suggest that developer obligations secured from a specific development can be spent on a city wide basis, and therefore the same flexibility should be applied for the provision of affordable housing. We do not consider that there should be a time limit (as set out in point 4 of this paragraph).
- 2.11 With regard to commuted sum payments within section 4.8, we welcome the suggestion that these will be reviewed on a 5 yearly basis, rather than an annual basis, and we suggest that wording is added to be clear that any change will be subject to consultation through the Local Development Plan and Supplementary Guidance review process.
- 2.12 However, we are concerned about the increase, through this guidance at section 4.8, to the commuted sum payments being sought. This issue has been raised by Homes for Scotland and its members through the Aberdeen City Affordable Housing Forum. We request that a robust evidence base is provided to support any increase in commuted sums that is supported by the Local Development Plan policy. We are concerned that this will slow down, and even prevent the delivery of all tenures of housing.
- 2.13 Homes for Scotland, through its Grampian Home Builders' Committee, would like to come to an agreement with Aberdeen City Council on the level of commuted sums to support the delivery of development. The current commuted sum arrangement was agreed following discussion with the home building industry, housing associations and the planning gain teams and is based on the assessed market value for land for affordable housing. This was based on comparable evidence of actual affordable land transactions. We accept that the actual sums of money should be reviewed on a regular basis, but we do not accept that there is evidence to support the introduction of a new methodology for calculating the funds. We recommend that if this is not amended by Aberdeen City Council that this is scrutinised fully through the Examination process.
- 2.14 Homes for Scotland does not agree with the RICS methodology for valuing affordable housing land. The residual valuation methodology is not appropriate in such transactions, and is far too onerous. We want to be supporting and facilitating the delivery of affordable housing, and this methodology does not do this.
- 2.15 In paragraph 6.2, we dispute the requirement for 25% affordable housing for accommodation for the elderly and suggest this is removed from the guidance as a requirement. This is housing to meet a specific need, much like student accommodation and relieves demand on affordable housing.

3. TRANSPORT AND ACCESSIBILITY

- 3.1 Homes for Scotland considers, in the first instance, that this draft guidance is too detailed and that much of the detail would be more appropriate in a Technical Advice Note (TAN) rather than as Supplementary Guidance.
- 3.2 We consider the guidance to be confusing at Section 3.1 where there seems to be reference to allocation of sites, rather than the Development Management process of determining applications for development. There is little that can be done at the Development Management stage if an application comes forward on an allocated site which is not within 400m of public transport. It should be for the planning authority and wider departments of the local authority to assess this in the allocation of a site for inclusion within the Local Development Plan, rather than for Supplementary Guidance to expect a developer to be able to influence this. What happens if public transport is not available within 400m of an allocated site?
- 3.3 We suggest that the requirement in Section 3.2 for all new developments to install appropriate electric vehicle charging infrastructure to be excessive and unclear. We do not consider that this infrastructure would be widely used. If the Council considers it to be necessary, we would like to see the authority's evidence base, and statistics from current electric vehicle infrastructure in place.
- 3.4 As highlighted within our response to the Developer Obligations draft guidance, Homes for Scotland does not support requirements for developers to contribute towards the costs of a Car Club. As a commercial business which will benefit from the new development of homes, we do not consider it to be the developer's responsibility to contribute towards this business, or to provide free memberships and promotions to new residents.
- 3.5 Homes for Scotland supports the flexibility in section 3.4 on low car or no car development in certain circumstances where evidence can be provided to show that car ownership and use will be low. However, we suggest that the list of bullets on Page 5 should have some accompanying text to make it clear that any of these factors could justify low or no parking in a new housing development, and that it is not considered that all will be required to be met.
- 3.6 On page 14, we note that the parking standards have changed for dwellings, but no evidence has been provided to justify this change. For example, the requirement for residential dwellings in the inner city has increased from 1.75 to 2 spaces. Housing association / social housing in the outer city has increased from 0.8 to 1 space per unit. We query this increase, and ask that an explanation is provided.

- 3.7 In section 5.6 on cycle parking standards, we query the requirement to provide “appropriate facilities” off-site within 50m of the development where there is no room for facilities to be provided on-site. This will not always be possible if the developer does not have access to land off-site. We consider this requirement to be impractical and suggest it is removed.

4. LANDSCAPE

- 4.1 Homes for Scotland considers that the requirement for 50% of external space in private courts to be used as amenity space (paragraph 4.1) is overly onerous, and largely unworkable. The requirement should be more flexible and responsive to the individual site characteristics on a case by case basis. We suggest that text is amended to state that amenity space is to be provided, but the detail will be dealt with by planners either through the pre-application stage or after submission of the planning application.
- 4.2 We also suggest that garden sizes prescribed in the draft guidance should have some flexibility. The guidance must be able to respond to different scenarios which may occur – for example, a house over 2 storeys requires at least 11 metres garden space, but there may be an occasion where there is a townhouse over 3 storeys but is narrower and smaller in floorspace than a large 2 storey house. This example shows that a blanket approach does not work, and it should be for the planning officer to determine the suitability of this space relevant to the site’s circumstances.
- 4.3 We note that the guidance also makes provision for the requirement of additional space. We do not agree with these provisions, and would again request a degree of flexibility. For example, if purchasers of a house wish to have a shed in their garden, it is up to them to locate that shed within the garden space provided. Similarly, the developer should not be penalised for a purchaser desiring a conservatory – this should be taken into account by the buyer when purchasing the property. This section is too detailed, and not workable in practice.

5. GREENSPACE NETWORK AND OPEN SPACE

- 5.1 Homes for Scotland suggests that reference to the Council’s preferred approach for the management and maintenance of open space being Council adoption on Page 16 is deleted from the draft Guidance. Our Members’ experience is that this does not happen and the Council’s landscape team does not encourage it. On the few occasions it has happened, customer experience has been poor as the maintenance standards have not matched that of the customers’ expectations.

6. RESOURCES FOR NEW DEVELOPMENTS

- 6.1 Homes for Scotland does not have detailed comments to make on this Supplementary Guidance. We note that the draft guidance is very detailed and suggest that much of the detail would be more appropriate in a Technical Advice Note (TAN) rather than as Supplementary Guidance.

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APPENDIX 1 – PERTH & KINROSS PROCEDURE NOTE

AFFORDABLE HOUSING CREDITS

DRAFT PROCEDURE & GUIDANCE NOTE – Apr 09

The Affordable Housing Guide approved by the Enterprise & Infrastructure Committee in August 2007 allows consideration of proposals for affordable housing credits i.e. where a developer over provides affordable housing on one site, these ‘credits’ can be accrued and used to reduce the affordable requirement on another site within the same Housing Market Area.

The Council agreed in December 2008 to delegate authority to the Executive Director (Environment), in consultation with local Members and the Convenors of the Enterprise & Infrastructure and Housing & Health Committees, to agree to proposals to build up credits and to agree to the use of accrued credits.

The preferred method will be where a developer puts forward a complete package of sites indicating those which are to be developed wholly for affordable housing or which will have an increased affordable housing percentage, and those which are to have no or a reduced level of affordable housing. This will enable the Council to assess the merits of the complete package. It is recognised, however, that it will not always be possible for a developer to identify at the outset those sites which will be included in a credits package and in such cases proceeding on a site by site basis will be acceptable.

Criteria for assessing applications for credits

In assessing applications for credits the following factors will be taken into account:

Need for affordable housing in the area (both the settlement and the wider Housing Market Area) – the acceptability of the alteration to the normal percentage split between affordable and private housing as required by the affordable housing policy will depend on the location of the site, the level of need, and the need to create / retain mixed communities

Selling price of the houses or land – the Council will need to be satisfied that the houses being put forward as credits are affordable and / or the land transferred to an RSL for the credits is at affordable land value and not at open market value

Ability of the RSL to deliver the affordable housing within a reasonable timescale – funding should be available for the affordable housing to be built within the 5 year lifespan of the Strategic Housing Investment Programme

Settlements where the developer proposes to use the accrued credits (if known) and the need for affordable housing in these areas

The following considerations will also apply:

Credits must be built up in advance of the private sector development (unless the developer is putting forward a complete package of sites where there may be scope for some flexibility)
Credits will normally be permitted to be used on sites of up to 50 houses (a mix of tenures will still be required on larger sites)
The Council will define the areas within which credits can be used – generally the same HMA
Credits will be valid for 5 years – this may be extended up to a maximum of 10 years subject to the agreement of the Executive Director (Environment) and consultation with Members / Convenors
Only additional affordable houses granted planning consent from January 2007 onwards can be counted as credits
The Council's written agreement to houses being counted as credits will be required – credits cannot be granted retrospectively
Sites already in RSL or public sector ownership will not be eligible for credits
Where a package of site is being put forward the number of affordable units proposed overall should be at least equivalent to 25% affordable housing contribution.

Procedure for assessing applications to accrue affordable housing credits

This will be a two stage process: firstly the Council will need to agree to affordable housing credits being accrued (steps 1-5); secondly the Council will need to confirm that credits are available for use (steps 6&7)

1. Application is made in writing by developer incorporating the following information:
 - the terms of the agreement with the RSL including confirmation that any housing being put forward for credits have or will be sold at affordable value (copy of agreement or letter from RSL confirming this has been secured by a legally binding agreement will be required)
 - the proposed tenure mix (for agreement with Housing & Community Care: Planning & Policy)
 - timescale for the sale of the land / completed houses to the RSL

- if known, an indication of where the developer would wish to use the credits
2. The application is registered and discussed with Housing & Community Care: Planning & Policy and Development Management Service
 3. Once recommendation has been agreed a standard proforma setting out the details of the credit proposal is emailed to local Members and the Convenors of the Enterprise & Infrastructure and Housing & Health Committees – often when site purchase is involved there is a short timescale within which decisions need to be made but there will be a minimum period of 5 days for consultation with Members
 4. An internal assessment form is completed by the Environment Service: Planning for authorisation by either the Head of Planning where Members are in agreement with the recommendation, or the Executive Director (Environment) where Members are not in agreement or have expressed reservations
 5. Applicant is advised of decision using standard format letter which will advise the applicant of the outcome of the application and the reasons for the decision. Where the application has been approved the following information will also be included (as appropriate):
 - confirmation of the number of credits being awarded
 - the point at which credits will take effect and the process for confirming credits
 - the timescale for using credits – generally this will be 5 years but may be extended to 10 years subject to the agreement of the Executive Director (Environment) and consultation with Members / Convenors
 - confirmation of the housing market area within which credits can be used
 6. In order for the credits to be available for use the developer will be required to submit evidence that the affordable houses (to which the credits apply) have been built and transferred to an RSL, or the land has been sold to an RSL (see note below) – this will normally take the form of a letter from the RSL confirming that the transaction has taken place
 7. The Environment Service: Planning will confirm in writing that the credits are now available for use subject to the conditions set out in the decision letter

Point at which credits take effect

Where the developer is building houses to transfer to an RSL or is building discounted or unsubsidised affordable housing (not involving an RSL) the credits will not take effect until the houses are built and transferred to the RSL or, in the case of discounted and unsubsidised affordable housing, the houses are occupied.

Where a developer is selling land to an RSL in exchange for credits the actual building of the affordable houses by the RSL will be outwith the developer's control (and will be dependant on the availability of development finance from the Scottish Government). In this case the credits will take effect at the point at which the land is sold to the RSL.

Relationship with the Development Management process

In the majority of cases the application for credits will be considered separately to the determination of the planning application. It is envisaged that generally credit proposals will be considered either in parallel with the planning application process or following the granting of consent.

Progress checklist

The following checklist will be used to record the progress of applications:

Stage	Date	Officer responsible (checking / authorising/ validating as appropriate)
Application registered		
Consultation with Members		
Recommendation		
Determination		
Submission of evidence		
Credits confirmed		

Procedure for assessing applications for the use of affordable housing credits

A similar process is used to assess applications by developers to use affordable housing credits which have been accrued:

1. Application is made in writing by developer indicating the site or sites where they wish to use the accrued credits
2. The application is registered and discussed with Housing & Community Care: Planning & Policy and Development Management Service
3. Once recommendation has been agreed a standard proforma setting out the details of the credit proposal is emailed to local Members and the Convenors of the Enterprise & Infrastructure and Housing & Health Committees – minimum of 5 days consultation
4. An internal application form is completed by the Environment Service – Planning for authorisation by either the Head of Planning where Members are in agreement with the recommendation, or the Executive Director (Environment) where Members are not in agreement or have expressed reservations
5. Applicant is advised of decision using standard format letter which will advise the applicant of the outcome of the application and the reasons for the decision. Where

the application has been approved the letter will confirm the site or sites where credits can be used.

In assessing applications to use affordable housing credits the main considerations will be: the need for affordable housing in the area and confirmation that sufficient valid credits are available.

Progress checklist

A similar checklist will be used to record the progress of applications:

Stage	Date	Officer responsible (checking / authorising/ validating as appropriate)
Application registered		
Consultation with Members		
Recommendation		
Determination		
Use of credits confirmed		

Monitoring

All applications and determinations are held by the Environment Service: Planning. Details will be reported annually as part of the report on the spending of affordable housing commuted sums.