
ARGYLL AND BUTE COUNCIL

EXECUTIVE

COMMUNITY SERVICES

THURSDAY 19th MARCH 2009

**“INVESTING IN AFFORDABLE HOUSING: A CONSULTATION” – DRAFT
RESPONSE**

1.0 SUMMARY

1.1 This report proposes a draft response to the Scottish Government’s consultation paper “Investing in Affordable Housing” which was issued in December 2008. Final responses are due by the 17th March 2009, therefore a copy of the draft has already been submitted to comply with this deadline on the strict understanding that it is still subject to approval.

2.0 RECOMMENDATIONS

2.1 Members are asked to approve the draft response for formal submission.

3.0 BACKGROUND

3.1 The Scottish Government issued the consultation paper “Investing in Affordable Housing” in December 2008. Key aspects of the proposed reforms are, in summary:-

- Housing investment priorities would be determined on a regional basis and agreed with local authority partners;
- The regional priorities would be set out in Prospectuses which would be based on Strategic Housing Investment Plans;
- Lead Developers would operate within the agreed regions, and there should be scope for there to be more than one Lead Developer in each of the regions;
- In order to become a Lead Developer, Registered Social Landlords (RSLs) would be encouraged to form development consortia that are committed to securing greater efficiency and more value from the investment in affordable housing;

- Each consortium should be led by one RSL which would then bid for subsidy on behalf of the consortium as a whole and would be a prospective Lead Developer;
 - There will be time for RSLs not currently working in existing consortia to organise themselves and either join a consortium or set one up;
 - There would be two stages in the process: the first stage would be *pre-qualification* and only pre-qualified RSLs would be able to move on to the second stage, which is bidding for subsidy and for appointment as a Lead Developer;
 - All pre-qualified RSLs, whether acting on their own behalf or as heads of a consortium, should be able to compete for subsidy for short-term costed projects; and, if they wish, seek appointment as a Lead Developer which would secure for them a conditional guarantee of programme funding for up to five years;
 - Subsidy would only be awarded to those projects which offer the most competitive price and best match the funding criteria; and
 - Future rounds of competition for subsidy would be conducted as and when necessary, bearing in mind that, where Lead Developers have been appointed, much of the Investment Programme may already have been committed to them.
- 3.2 The consultation paper contains 24 specific questions and additional comments are also invited. The annex to this paper outlines a draft response which was jointly considered and approved by the Strategic Housing and Communities Forum on the 27th February 2009.

4.0 Conclusion

- 4.1 The Government's proposals for reforms to the Affordable Housing Investment Programme have important implications for local authorities and RSL partners. The proposals include key concepts such as the development of **Regional Prospectuses**; the creation of **Lead Developers**; and the establishment of **Development Consortia**.

- 4.2 The Council and its development partners have some serious reservations regarding the effectiveness of these proposals within the context of Argyll and Bute. In the circumstances, the proposed response has been prepared in collaboration with key partners and stakeholders on the Strategic Housing & Communities Forum. While highlighting areas of concern, the response also provides constructive comment on a way forward that would protect the interests of the Council, its RSL partners, local contractors and those who need access to affordable housing within Argyll & Bute.

5.0 IMPLICATIONS

- 5.1 **Policy** – The proposed reforms will impact on the Council's ability to plan strategically and to address local and national policy objectives. The aims and objectives of the Council's Local Housing Strategy and the Strategic Housing Investment Plan could be severely and adversely affected.
- 5.2 **Finance** – The effect of the Scottish Government's proposals could have significant implications for the local economy, the construction industry in general, and for the delivery of the Council's Strategic Housing Investment Plan.
- 5.3 **Legal** – The Council would be required to enter into legal arrangements with any proposed Lead Developer and Registered Social Landlord consortium for the delivery of planned objectives.
- 5.4 **Equal Opportunities** – Regionalisation and proposals for bulk procurement could have an adverse effect on remote and rural communities and on those with special housing needs. They may also inhibit opportunities for local contractors to bid for work.
- 5.5 **Personnel** – Nil.

Director of Community Services
February 2009

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Background Papers: For the full text of the consultation document, visit www.scotland.gov.uk/Consultation/Current

ANNEX: "INVESTING IN AFFORDABLE HOUSING" – CONSULTATION RESPONSE ON BEHALF OF ARGYLL AND BUTE COUNCIL

QUESTION

RESPONSE

Question 1

To what extent does our assessment of the current economic situation reflect your assessment?

Argyll & Bute Council is currently updating its Local Housing System Analysis and Needs Assessments, but our basic understanding of the economic situation reflects that of the Government generally, as summarised in this paper and other publications such as "Responding to the Changed Economic Climate: More Action on Housing" issued in January 2009.

The Council's own recent Key Housing Issues paper, produced in collaboration with partners on the Strategic Housing & Communities Forum in August 2008, highlighted increasing concerns for Members and RSLs, for example in securing viable financial packages via private sector borrowing. The current credit crunch exacerbates these difficulties.

The Council would also support the Scottish Federation of Housing Association's analysis, that increasing land prices and development costs have been the key factors in the recent pressurised housing markets exacerbated by high Housing Association Grant (HAG) subsidy levels and reduced Affordable Housing Investment Programme (AHIP) funding, rather than any minor inefficiencies inherent in historical procurement practices.

This Council and its RSL partners would challenge the Government's assertion that at around 14 homes the average size of scheme is low and "limits scope for process and cost efficiencies". In rural and remote areas

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	<p>such as Argyll & Bute, this would be considered quite a large project and it would be impractical to assume that joining up several schemes which may be miles apart from each other in diverse and isolated communities could in any way hope to achieve significant cost savings.</p> <p>Argyll and Bute Council and its partners would also challenge the Government's overall assumption that the current procurement system, as developed and operated within this authority area, does actually exhibit significant inefficiencies or indeed that the Government's proposals would introduce any efficiencies. There is no clear evidence for either assumption.</p> <p>In addition, we have concerns regarding the impact of the potential policy changes where economies of scale are sought through the use of large building contractors who do not normally operate within the authority area. There is the risk of such proposals impacting negatively on local economies with fewer jobs for locals and consequent depressed income levels, directly resulting in an adverse impact on the socio economic opportunities available to the local population. The Council and its partners do not believe these proposals support the regeneration agenda, the health inequalities agenda, nor do they promote the improvements to mental health and wellbeing as well as physical health which feature in local Community Planning priorities and national outcomes.</p>
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<p>Question 2 Does the economic situation strengthen or weaken the case for investment reform at this time, & why?</p>	<p>This economic situation may be viewed as a temporary anomaly or, in part, as a necessary corrective to an overheated & unsustainable market, however, a time of such economic uncertainty does not provide the most favourable environment for introducing radical procurement reforms. Given the current reluctance of lenders to risk funding RSL activity, and the direct impact of the financial crisis on the housing system and on local economies - for instance on the local construction industry - many stakeholders would consider this totally inappropriate.</p> <p>This Council would accept that the recent detrimental reductions in AHIP and changes in HAG subsidy levels (as referred to in Q1 above), require review and amendment, however, the specific reform proposals at the heart of this consultation are less clearly necessary and must not be imposed too hastily or without due consideration.</p>
<p>Question 3 Do you agree that local authority Strategic Housing Investment Plans and related strategies should form the basis for identifying investment priorities for periods of up to five years?</p>	<p>The proposals for 5 year investment programmes to underpin and enable long-term, forward planning are welcomed as a positive and practical approach. It is essential (by definition) that investment priorities should be based on the appropriate Local Housing Strategy (LHS) and Strategic Housing Investment Plan (SHIP) and that these be aligned with Development Plans which are required to take a long-term vision on the effective supply of land.</p> <p>Currently, development of realistic and effective SHIPs has been hampered by the lack of provision of detailed resource assumptions for future years, however it is hoped that resource allocation will in future reflect the proposals</p>

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	<p>and projections set out in the later years of the SHIP programme. In fact, the Council would argue that a 5 year programme should be the minimum period for investment planning and that anything shorter would be impractical and ineffective and would not allow for the objectives of greater efficiencies and improved investment and procurement processes to be achieved.</p>
<p>Question 4 Do you agree with our proposed principles on which geographic regions for investment will be based?</p>	<p>This Council has consistently challenged the appropriateness of the regional approach in previous consultation responses, given the unique and relatively discrete context of both Argyll & Bute and the majority of the local, rural housing markets within the area. It should be noted that the majority of the projects within this area are small in scale and very localised, often on problematic sites with infrastructure constraints and other restrictive factors that impact on delivery costs and viability of schemes. The assumption that regionalisation would secure efficiencies of scale in these circumstances, therefore, is entirely inappropriate.</p> <p>Given the exceptions applied to other island authorities, the Council and its partners consider that there is a compelling case for Argyll & Bute to be viewed as a particular case too. There are 25 inhabited islands in this authority, more than any other local authority area in Scotland, and most are not well interconnected as links tend to be with the mainland, which itself is divided by long sea lochs that cut deep inland and further fragment already remote and sparsely populated areas. This extends road links with long drive times and very often only one road connects settlements. 17% of the local population live on islands and are reliant on a ferry. This amounts to almost 16,000 persons and 7,500 households. In fact Argyll & Bute has been</p>

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	<p>described as "the most diverse local authority area anywhere in the UK". There is no strategic or functional rationale for grouping Argyll & Bute with authorities such as Inverclyde, East & West Dunbartonshire, and Renfrewshire, as proposed. These authorities are predominantly urban based and quite distinct in character from the remote rural and island nature of Argyll and Bute, therefore such regionalisation would not be addressing like for like.</p> <p>In addition, the Council also envisages geographical issues and additional bureaucratic confusions arising between the proposed grouping of local authorities and other pre-existing, non-contiguous geographies such as the needs and impact of the Loch Lomond & Trossachs National Park area. Within Argyll and Bute, it is also the case that the main builders and developers operate within circumscribed boundaries and the imposition of the proposed regional boundaries would neither reflect nor serve their interests in the local housing markets to any significant degree. Previous experience would indicate that introducing competition into the procurement process along the lines proposed does not in fact deliver any concrete benefits nor achieve efficiency savings and may indeed have quite contrary effects in the long term. Given the geographical extent and complexity of this authority, there is no clear argument for economies of scale across a wider region, and it must be borne in mind that housing needs within Argyll and Bute are particularly localised and so cannot be addressed on a regional basis.</p> <p>The scope of the proposals within the current SHIP also demonstrates</p>

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	<p>clearly that Argyll and Bute, as a discrete region in itself, has the capacity to support an extensive 5 year affordable housing investment programme and indeed beyond an initial 5 years.</p> <p>Ultimately, there is also the crucial issue of governance across such a diverse and artificially constructed regional entity. It is not clear how this would operate and what, if any, benefits would be achieved. There is no evidence to suggest this approach would encourage effective competition and there is a real risk that the high-cost schemes typical of a geographic area such as this will be put at risk within a wider region.</p> <p>Argyll & Bute Council is firmly of the view that the local authority's LHS and SHIP, subject to effective local governance, are the key building blocks rather than regional prospectuses.</p>
<p>Question 5</p> <p>a) Do you agree with our proposed treatment for Orkney, Shetland and the Western Isles Councils?</p> <p>b) Do you agree with our proposed approach for Glasgow City and City of Edinburgh Councils?</p>	<p>a) See comment for Q4 regarding proposed approach to the island authorities – this authority would argue that similar exceptional circumstances apply to Argyll & Bute with our 25 inhabited islands. Previous LHS/SHIP development work has identified only limited scope for cross-boundary synergies with neighbouring authorities and we would anticipate similar marginal outcomes for local procurement through the proposed regionalisation approach. Indeed, these proposals could prove in practice to be detrimental to the current and developing good practice in procurement within this particular authority and may actually introduce counter-effective inefficiencies in the longer term.</p> <p>b) The Council and its partners are also concerned that the proposed approach to Edinburgh, Glasgow and the "island" authorities, will result</p>

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	<p>in a significantly restricted national "pot" for affordable housing investment in the other authorities and that, in particular, this will impact disproportionately and inequitably upon a remote rural authority such as Argyll & Bute. It is difficult to see the justification for removing so much of the national investment "pot" if the Government's aim of securing efficiencies across all authorities is to be achieved.</p> <p>However, this Council has remained firmly in agreement with the concept of Transferred Management of Development Funding as applied to Edinburgh and Glasgow, and would urge that this approach should be extended to other local authorities to reflect their strategic role in relation to housing.</p>
<p>Question 6 Do you agree that Councils, as the strategic planning and housing authorities, and in collaboration with RSLs, should advise on the regions to be adopted as the basis for Prospectuses?</p>	<p>As stated above, the Council is fundamentally opposed to this proposal on procurement, and would argue strongly that the approach should be based on local authority boundaries rather than unwieldy, large regions. However, if regions are introduced, as strategic housing authorities, it is essential that Councils are fully involved in the ultimate decision making.</p>

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<p>Question 8 a) Do you agree that there is a need to provide guidance within Prospectuses on maximum rent levels and is the proposed framework acceptable?</p>	<p>There is already clear evidence of increasing pressures on rent levels in this area and Argyll & Bute Council with its RSL partners would agree that any adverse impact of these proposals on rent levels would be of critical concern, due to high levels of benefit dependency and compromised affordability across the housing system. Therefore, if the prospectus concept were to be introduced contrary to our views, then additional guidance and formal framework for safeguarding rent levels within the proposed context of prospectuses would be necessary. There may be scope for undertaking work to define and standardise the definition of affordability as a basis on which rents can be measured and set. Local RSLs would have concerns that maximum rents become the norm and that any RSL with lower rents (for justifiable socio-economic reasons) would be forced to use the maximum for HAG appraisal purposes.</p>
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Question	Response
<p>Question 9</p> <p>a) Are there other issues which would similarly benefit from guidance?</p> <p>b) What are these and what is the case for including them?</p>	<p>a) Yes, there are a number of additional issues which would benefit from clear and detailed guidance.</p> <p>b) More guidance is required on the governance and decision-making processes for the proposed regional structures and on how prospectuses will be developed and how exactly the LHS and SHIP will inform these. In addition, if they are to be introduced, clear guidance on the mechanisms for prioritising investment allocations across regional prospectuses is crucial.</p> <p>Further, guidance on issues such as design and space standards, energy efficiency, would be helpful to ensure that that cost-efficiencies do not over-ride or compromise the quality standards currently being provided by RSLs and which the Scottish Government has made a clear commitment to uphold.</p>
<p>Question 10</p> <p>a) Is the Lead Developer role proposed here sufficient to deliver a more streamlined and effective approach to investment in and procurement of new affordable housing?</p>	<p>a) While acknowledging the intentions and principles underpinning this proposal, Argyll & Bute Council and its development partners require further evidence of the real benefit of the Lead Developer concept in practice and within the context of this type of authority. Given the geographic factors outlined in previous responses, the Council is not confident that a Lead Developer brought into the area, and lacking local knowledge or experience of the particular development issues pertaining to the area, would be able to deliver any real savings or achieve economies of scale.</p> <p>In addition, there is a need to provide clarity regarding the distinctive</p>

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<p>b) Does it adequately balance and recognize the needs and roles of non-developing RSL partners?</p>	<p>roles and remits of Lead Developers (as delivery mechanism) and Local Authorities (as strategic authority), and the relationship between both. The Council assumes that the Local authority, as strategic housing body, would oversee and direct the activities of a Lead Developer, in partnership with a consortium of RSLs.</p> <p>b) This is a contentious issue for the Council and RSL partners, and is likely to create more problems than it resolves, particularly in an area like Argyll and Bute if, say, external agencies with limited local awareness and experience were to be considered. It is necessary to ensure all RSL partners (and others) have appropriate input into the procurement process and participate in decision-making. Conflicts of interest between individual RSLs acting as Lead Developers and as equal members with other landlord functions will need to be resolved and this will require the establishment of detailed and potentially complex arrangements.</p> <p>While the additional proposals for multi developers and flexibility within the process are potentially helpful, they may also lead to further complication and therefore undermine the original aims of the proposal, i.e. to streamline processes and decrease complex bureaucracy. The integration of local RSLs into consortia is however a welcome and practical concept. It is the Council's firm belief that the Government's stated aims of efficiency may be best served within Argyll and Bute by the development of a local consortium of equal partners. This would build on work that has already been undertaken</p>

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	<p>in the area to develop partnerships with local contractors wherein on site efficiencies are developed.</p>
<p>Question 11 What are your views on the routes we propose for establishing Lead Developers?</p>	<p>The overall process would appear to be practical however more detail is required to assess the likely effectiveness. There is a definite role for the local authority in the process of evaluating and confirming Lead Developer bodies where these are deemed appropriate. The Council, as strategic housing authority, would have to assure itself of the credibility and capacity of any RSL appointed to such a responsible role.</p>
<p>Question 12 a) Do you agree with the proposed principles of consortia and responsibilities for consortium heads?</p>	<p>Argyll & Bute Council would welcome the basic principle of the consortium, a concept which is likely to work effectively within the context of this area, however, the role and remit of the local authority and all partners would need to be clear and formally defined. Ultimately, it is envisaged that the Council should be acting as the strategic lead agency for the consortium, with responsibility for managing the investment programme while the RSLs within the consortium constitute the delivery mechanism.</p> <p>Local consortia should be allowed to develop organic structures suited to local circumstances and not have "one-size fits all" national norm imposed externally. Some centrally produced models could be developed on which local groupings can base their structures. The danger of overly detailed processes and constrictive structure development (with associated costs, particularly legal) could actually detract from the fundamental goal of delivering affordable housing.</p>

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<p>Question 13 a) Do you agree with the proposals on formation of consortia, including the requirement of a formal agreement to govern relationships within consortia?</p> <p>b) What guidance would be helpful to support the sector in setting up consortia and Lead Developer arrangements?</p> <p>c) What guidance would be helpful to ensure tenant and community engagement in decision-making?</p>	<p>a) The argument for the formation of consortia to streamline procurement (within the context of local authorities and local housing markets rather than regions) appears sound and in line with the principles of Best Value. Formal agreements governing participants' relationships would be necessary and in Argyll & Bute there is some practical, positive experience of such formal partnerships within the context of the Common Housing Register.</p> <p>b) While detailed, specific guidance would be helpful and legal, contractual safeguards should be established, the operation of consortia should be flexible enough to suit local needs.</p> <p>c) For the future, tenant and community engagement in decision-making will have to be incorporated within the structures and mechanisms already existing within the LHS/SHIP processes.</p>
<p>Question 14 a) Do you consider that there may be circumstances in which consortium membership should include local authorities or other non-RSL bodies? b) In what circumstances would you see this as appropriate?</p>	<p>As strategic housing authorities, all councils should be involved within the consortium. Within this authority it would be most effective if the consortium was contiguous with the SHIP Development Group and consequently the Council must be included in membership. The Consortium would also be ultimately responsible to the Council and its activities would be monitored by our Strategic Housing & Community Forum.</p>
<p>Question 15 Are there circumstances in which bodies other than RSLs might be eligible to become heads of consortia and Lead Developers?</p>	<p>Given above comments, where a consortium is part of, or equivalent to, an LHS/ SHIP development partnership, there would be strong arguments for the local authority to take lead responsibility (as the Scottish Government proposals indicate, referring to "more influence for Local Authorities on the</p>

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	allocation of AHIP" and on assessing pre-qualification applications). In respect of Lead developers, there are also circumstances whereby authorities planning to undertake significant new build programmes should be eligible to assume this role.
<p>Question 16 Do you agree that a pre-qualification process should be included in the new arrangements?</p>	<p>The pre-qualification process is a useful step towards ensuring basic standards, qualifications, experience & capacity are in place, however, this process should not duplicate or merely add to existing Regulation & Inspection processes, e.g., those procedures already in place for RSLs with development functions. As stated above, the local authority would have a role in this process, as it would have to be satisfied that the approved vehicle is fit for purpose.</p>
<p>Question 17 Are the pre-qualification criteria and information requirements set out at Annex C a reasonable basis on which to work with the Regulator, the SFHA and COSLA to refine the pre-qualification process?</p>	<p>If this approach is to be adopted, then the details set out in Annex C would require further development of the pre-qualification process in liaison with all the relevant bodies.</p>
<p>Question 18 Do you agree with the proposed funding criteria for bids for specific projects?</p>	<p>This Council has concerns regarding the emphasis on competition in the context of this relatively high-cost area, and believes that the introduction of an approach based on competitive bulk procurement would be counter productive and would not achieve the anticipated efficiency savings but is more likely to increase uncertainty into the tendering process.</p> <p>Regarding the proposed funding criteria: Amount of subsidy – The Council agrees that this criterion needs to be balanced against other criteria to ensure a comprehensive assessment of</p>

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	<p>Value For Money;</p> <p>Deliverability – The Council agrees that projects should be realistic and achievable in terms of land ownership; scheduled development plans; and fully costed requirements;</p> <p>Quality – The Council agrees that proposals would be required to meet explicit standards of quality;</p> <p>Local Authority Endorsement – It is essential that all subsidised proposals must contribute to the local strategic plans and objectives set out by the Council and reflect the investment priorities as set out in the SHIP & LHS;</p> <p>Ownership & Management – The Council agrees that details of ultimate ownership and management arrangements for proposed units must be specified.</p> <p>In addition, further clarification would be required regarding the allocation of the funding to address local needs and the precise roles and responsibilities of local authorities (in managing resources through the LHS and SHIP) and any Lead Developer. The implications for non lead developers in accessing funding also need to be considered in detail.</p>
<p>Question 19 Do you agree with our proposed approach to development of an assessment framework?</p>	<p>The Council agrees that the development of a transparent and consistent assessment framework should be progressed jointly with COSLA and SFHA. Clarity on the role/input of Local authorities is required. The balance between objectivity and subjective judgment in assessment must also be clarified. In particular, this authority would agree that due account is required of the investment priorities set out in the SHIP and that this must reflect the priority to be given to both special needs accommodation and the requirements of</p>

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	remote and rural areas. Assessments must balance and resolve any potential conflict between these priorities (i.e. special and rural needs) and the drive to achieve lower unit costs.
<p>Question 20 How might we enhance the involvement of local authorities, RSLs and other stakeholders in the assessment of proposals?</p>	<p>We would expect local authorities to be fully involved in the appraisal of all proposals and that ultimately these must be developed within the context of the LHS and SHIP and subject to the existing local authority governance regime. It is not clear how this governance would be achieved through the proposed regional model. Further guidance to specify this approach would be helpful. At the national level, clear and agreed procedures should be set by the Scottish Government and COSLA in consultation with the SHFA. At the local level, Councils should liaise with local Housing Investment Division Offices to assess pre-qualification submissions and bids for AHIP by lead developers and other RSLs.</p>
<p>Question 21 Do you agree with our proposed approach to the appointment and management of Lead Developers?</p>	<p>This Council is not in agreement with the basic concept of Lead Developer as proposed. (See previous comments). Fundamentally, we do not believe this is the only effective way for local consortia to operate, however, if this were to be imposed then more detail on issues such as monitoring and sanctions against poorly performing lead developers would be helpful. Any Lead Developer would have to demonstrate, as a minimum,</p> <ul style="list-style-type: none"> • clear commitment to developing housing appropriate to the area (and to delivering the aims and objectives of the LHS and SHIP); • financial capacity and sound governance; • the support and agreement of all consortium partners;

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	<ul style="list-style-type: none"> • fully developed schedules which include detailed costings & timescales for at least the first 1 to 2 years of the proposed programme; • clear proposals for ultimate ownership & management of the new units; and • and a Monitoring & Evaluation framework which outlines performance indicators against which efficiency, effectiveness and value for money will be measured <p>As stated above, ultimately, the Local Authority would have to satisfy itself of the suitability and capacity of any organization to be appointed to operate within its boundaries. RSL partners also have significant concerns about the role and responsibilities of a single Lead Developer which is a highly risky remit and may not be attractive or feasible for one organization itself, particularly in the current economic downturn. Other models of consortium structure and delivery should be permissible to suit local circumstances, rather than incorporation into wider regional structures. The best way forward for Argyll and Bute is more likely to be achieved through improved on-site project management and this would be best delivered through a partnership of equals which embodies local knowledge and experience of tackling the particular difficulties characteristic of this authority area.</p>
<p>Question 22 a) Do you agree with the overall approach to grant agreements for Lead Developers as set out here?</p>	<p>a) In principle, Argyll & Bute Council would agree that Grant Agreements should reduce cumbersome processes as far as possible and encourage streamlined efficiency, while ensuring best value is</p>

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<p>b) What do you suggest we could alter to make grant payments more streamlined?</p>	<p>sustained. However, clear guidelines on monitoring the delivery of grant against a schedule of outputs and outcomes would be necessary.</p> <p>b) Longer term commitments to future levels of funding should be in place, as far as possible, to allow developments to proceed with some assurance of security for developers and partners. A robust but flexible approach to monitoring progress across a SHIP-based programme would help reduce the bureaucracy of micro-managed individual projects.</p>
<p>Question 23 Do you have any comments on the proposed timetable?</p> <ul style="list-style-type: none"> • June 2009: Regional structure confirmed, pre-qualification prospectus issued and RSLs start to make provisional plans for joining consortia and applying to become a Lead Developer • September 2009: deadline for applications for pre-qualification • October 2009: appointment of pre-qualified RSLs • November 2009: regional Prospectuses published and all pre-qualified RSLs invited to apply for subsidy and for appointment as Lead Developer 	<p>This timetable is extremely challenging and does not appear to follow a clear, logical sequence. Further consultation and discussion at both local and national level s is required regarding, for instance, acceptable regions and the development of prospectuses. It appears that these prospectuses are supposed to reflect individual SHIPs although these would be under development at the same time to meet the November deadline for submission. This seems impractical, to say the least.</p> <p>Ultimately, this process must sit with the SHIP development & LHS review processes which most local authorities are currently undertaking and, therefore, this Council does not consider such a timetable to be realistic or achievable, particularly at this time of economic uncertainty. The Council and its partners would have great concerns about the imposition of such far-reaching reform with undue haste. This is particularly so at this time of</p>

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<ul style="list-style-type: none"> • Oct 2009 – Feb 2010: RSLs finalise both their consortium membership and investment proposals • March 2010: Deadline for applications from pre-qualified RSLs/consortia for funding of specific projects over 2010-12 and for appointment as Lead Developer • April 2010: Competitive awards of subsidy for 2010-2012 and appointment of Lead Developers for 2010-2015 	<p>economic uncertainty when the impact could be damaging to the local economy and local housing system within Argyll & Bute.</p>
<p>Question 24 Which indicators and what aspects of the Investment Programme should be included in a monitoring and evaluation framework?</p>	<p>Monitoring & Evaluation should focus on the agreed LHS outcomes & SHIP objectives and targets, taking account of cost and quality but with due allowance for local circumstances and context. However, it is not clear who would oversee this across a region or how it would be undertaken within that context. Existing Monitoring & Evaluation structures should be built on rather than creating further bureaucratic and disassociated structures.</p>