

**Peterborough Housing Strategy 2011 – 2015
(Incorporating the Peterborough Strategic Tenancy Policy)**

Report on comments received in respect of the Consultation Draft version (November 2011) and a
response to the Key Issues raised

December 2011

Foreword

This document sets out a summary of the comments and issues raised at the Consultation Draft stage (November - December 2011) of preparing the Peterborough Housing Strategy 2011 – 2015 and Peterborough Strategic Tenancy Policy, together with the Council's response to the key issues raised.

This is a public document, and helps meet Peterborough City Council's commitment to consult and keep people informed of progress on the preparation of key policy documents that affect the authority area.

The Housing Strategy Team at Peterborough City Council has prepared this document.

Introduction

- 1.1. Peterborough City Council is very pleased with the response to the public consultation on the Draft Peterborough Housing Strategy 2011 – 2015 and Peterborough Strategic Tenancy Policy. The consultation took place between 14 November and 12 December 2011. We particularly thank all those who took the time to write to us with your thoughts, ideas and concerns.
- 1.2. As part of the consultation, the draft Housing Strategy and Strategic Tenancy Policy was published on Peterborough City Council's online consultation portal. Hard copies of both documents, along with printed representation forms, were made available in each library across the city and within council offices.
- 1.3. Details of the consultation period were also made available through local media, including a series of newspaper articles, press releases and a radio feature.
- 1.4. The purpose of this document is to highlight to everyone a summary of what was said and where possible how we propose to take these comments forward.
- 1.5. We received a lot of responses, and many were very detailed in nature. This document cannot summarise every point made, but rather it tries to capture the most important or frequently mentioned issues. However, rest assured that all comments received have been read and considered in detail, even if you cannot explicitly see it summarised here.
- 1.6. On the following pages, we set out in a standard format the comments received for each policy and explanatory text relating to it. We also incorporate any general comments made in regard to this document.
- 1.7. We have kept the comments as anonymous as possible because what is said is more important than who said it. However, if anyone feels we have substantially misinterpreted your views, then please let us know.
- 1.8. The city council did not receive comments on the following policies and therefore these are not listed in this report

HS5	HS25
HS9	HS28
HS12	HS29
HS14	HS30
HS24	HS38
- 1.9. As part of the consultation the city council also held a half day consultation event aimed at professionals. This event provided an opportunity for partner agencies to gain a better understanding of the proposals set out in these two important documents, and to take part in a series of workshop sessions in order to discuss key housing-related themes. A summary of the outcome of this consultation event, along with a list of organisations represented at the event, is included within this document.

Draft Peterborough Housing Strategy 2011-15: Key Issues

Comments relating to Policy HS1 – Housing growth	
Summary of comments received	<ul style="list-style-type: none"> Support for the city council's commitment to substantial growth, notably the "necessary level of certainty" that the target provides for developers and housing associations. Concerns were received about the evidential basis that justifies the 1,420 homes per annum target. The target will be difficult to achieve in present economic climate. As a result, a consultee argues that the target set out in policy needs revisiting. There is a need for robust forward planning, infrastructure provision and funding in order to meet this target.
Response	<ul style="list-style-type: none"> Support, concerns and comments noted. There will be no change to the overall housing growth target, as the Peterborough Core Strategy (and the evidence associated with its preparation) justifies this level of growth.

Comments relating to Policy HS2 – Delivering the infrastructure to support growth	
Summary of comments received	<ul style="list-style-type: none"> A representation raised concerns about the flexibility of CIL. The city council needs to be "cautiously aware" of the "moderating effect" of a Community Infrastructure Levy upon bringing forward development proposals. The city council should consider individual site viability issues when setting an appropriate level for CIL in order to ensure that development proposals remain financially viable. The city council should work and consult with its development partners when developing its own CIL in order to ensure that it is "appropriate and proportionate" to Peterborough's specific circumstances. Alternative policy wording that reflects the need to consult has been suggested; <i>The city council will prepare a Community Infrastructure Levy Charging Schedule and Developer Contributions Supplementary Planning Document setting out the relationship between the two, with a view to carrying out full consultation and having both adopted during the 2012/13 financial year.</i> One representation asks why funds raised by CIL are not to be "ring-fenced". There are concerns that the introduction of CIL and Developer Contribution SPD may reduce the number of affordable homes that can be developed in the future through s.106 agreements and 'planning gain'.
Response	<ul style="list-style-type: none"> The city council is at the very early stages of undertaking detailed viability analysis and consultation in order to set a CIL charge which is appropriate for the Peterborough area. The council is well aware of the importance of achieving a balance between the growth, infrastructure needs and the contributions which developers must make. The city council will also be directing an updated development viability analysis using suitably qualified specialists in order to ensure the charges set do not place unreasonable demands in terms of overall development viability. Analysis will include a wide range of development types, locations and scenarios etc. It is confident that a balance can be reached. The city council will be consulting on their CIL proposals at a number of key points in the process and all stakeholders will be given the opportunity to comment and influence this process. In order to reflect this in the document, the city council will amend the wording of this policy as suggested in the representation referred to above. Funds raised by CIL are in effect 'ring-fenced' for spending on infrastructure demands created by new growth and development. Concerns regarding the impact of CIL upon affordable housing delivery are noted and understood.

Comments relating to Policy HS3 – Increasing the supply of prestige homes	
Summary of comments received	<ul style="list-style-type: none"> Measures to develop and protect against the loss of prestige homes are welcomed, especially as a means of providing a range of housing locally for high earners who presently commute from outside of the district
Response	<ul style="list-style-type: none"> Comment welcomed

Comments relating to Policy HS4 – Implementing high environmental standards for new housing	
Summary of comments received	<ul style="list-style-type: none"> Achieving higher environmental standards of sustainable design is a "laudable" aspiration. However, there is a correlation between higher environmental standards and construction costs. A flexible approach may need to be taken towards the assessment of what a "clear contribution" by developers might be in helping achieve the council's environment capital aspirations (as set out in Core Strategy policy CS10). The city council's own capital funding for new affordable housing, in particular that which is built to higher environmental standards, should not be restricted to housing associations but should instead be made available to private providers. However, other representations stated that the city council's own funding should be solely preserved for "exemplar" affordable housing development that cannot be funded by any other means other than through public subsidy. One representation raised the issue of poor indoor air quality as a result of heightened levels of air tightness in energy efficiency housing.
Response	<ul style="list-style-type: none"> Concerns and comments about the additional cost and issues associated with higher

	<p>environmental standards are noted. The council intends to prepare further guidance in this regard, in a separate document, during 2012. This separate document will include public consultation.</p> <ul style="list-style-type: none"> • Due to the source of the funding and the existence of a policy that governs how it is spent, the capital funding referred to in this section of the strategy is solely reserved for affordable housing. The city council has no current plans to amend the Affordable Housing Capital Funding Policy.
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Comments relating to Policy HS6 – Use of city council land to delivery housing growth	
Summary of comments received	<ul style="list-style-type: none"> • The release of land to support the delivery of affordable housing is welcomed. • One representation calls for closer collaboration between the city council and the private sector to deliver housing. The consultee calls for the policy to be amended, stating that there is “no logical reason in restricting the release of these assets to housing associations”. • One representation questions whether the plans to enter into closer collaboration arrangements with housing associations will be to the detriment of other housing associations that want to develop in Peterborough. • Another representation calls for “comprehensive public consultation” prior to any disposals being undertaken. • One consultee asked whether the city council will consider both deferred payment terms for its own land, and the sale of land at below market consideration, as a means of aiding housing supply. • Another consultee asked for the city council to use this section of the document to set out targets and timescales with regards to the city council's asset disposal strategy.
Response	<ul style="list-style-type: none"> • Disposal of land assets is an important contributor to the Capital Funds of the Council. Therefore, any disposal must be measured against best value criteria irrespective of the disposal route chosen. • Closer collaboration agreements with local housing associations will not be to the detriment of other housing associations that wish to develop in Peterborough. The disposal of council assets still requires each case to be considered on a site-by-site basis which may or may not include a housing association with which the city council has a collaboration agreement. • The city council is required to consult with both ward and cabinet members over the disposal of assets such as council land. • The city council is prepared to consider deferred payment for city council land, along with sale at below market consideration as a means of aiding housing supply. The text in the strategy will be amended to reflect this. • Targets and timescales regarding sites for consideration for disposal are already identified and approved at Full Council meetings as part of budget papers. Values are not identified but proposed disposal dates in terms of programmed for specific years are.

Comments relating to Policy HS7 – Stimulating the local housing market	
Summary of comments received	<ul style="list-style-type: none"> • Support received for Local Authority Mortgage Scheme, including one comment that stated a wish to see the scheme expanded to assist more households. • One consultee remarked that the scheme will provide “valuable assistance for those entering the housing market”, as well as providing “a stimulus to the housing market”.
Response	<ul style="list-style-type: none"> • Support welcomed.

Comments relating to Policy HS8 - Stimulating the local housing market	
Summary of comments received	<ul style="list-style-type: none"> • General support for this policy. • One representation highlighted “the hugely valuable role” that private shared equity schemes can play in delivering homes for those who cannot access the market, as an alternative to government-funded schemes.
Response	<ul style="list-style-type: none"> • Support welcomed and comments noted

Comments relating to Policy HS10 – Supporting self-build	
Summary of comments received	<ul style="list-style-type: none"> • In order to maintain consistency with government terminology, should this policy refer to “custom build” as opposed to “self-build”? The term “custom build” has been widened to encompass a range of other initiatives for small scale build, including community build projects.
Response	<ul style="list-style-type: none"> • This policy relates strictly to ‘self-build’ accommodation, as opposed to the types of housing encompassed by the wider term ‘custom build’. No change to the wording of the policy proposed.

Comments relating to Policy HS11 – Bringing empty homes back into use	
Summary of comments received	<ul style="list-style-type: none"> • Some representations considered this to be an ambitious target, and called for the city council to adopt “preventative measures” to address the issue. • One consultee made the comment that issues of conservation often worked against the need for empty homes to be redeveloped. • Wider comments were received about the merit of using government funding to bring empty homes back into use as affordable housing at a time when demand for privately rented accommodation is increasing.
Response	<ul style="list-style-type: none"> • Comment noted, and officers will consider whether any change in emphasis in the policy is needed. However, the principle of the policy will be maintained.

Comments relating to Policy HS13 – Addressing hazardous levels of disrepair	
Summary of comments received	<ul style="list-style-type: none"> Given the findings of the Stock Condition Survey, more needs to be done to address poor condition in private sector housing than what the strategy is presently proposing. “If problems are to be significantly reduced, greater numbers need to be dealt with”.
Response	<ul style="list-style-type: none"> The targets set out in the housing strategy are based upon the budgets available to enable the city council to <i>directly</i> intervene in addressing the condition of private sector accommodation in Peterborough. It is hoped that the strategic work of the city council, including work relating to the Green Deal, will lead to broader improvements in a much greater number of homes.

Comments relating to Policy HS15 – Supporting the Green Deal and ‘retrofit’ agenda	
Summary of comments received	<ul style="list-style-type: none"> General support for this policy. One representation requested the city council’s support in lobbying the government to ensure that housing association tenants are included as part of the ‘green deal’ initiative.
Response	<ul style="list-style-type: none"> Comments welcomed and noted

Comments relating to Policy HS16 - Supporting the Green Deal and ‘retrofit’ agenda	
Summary of comments received	<ul style="list-style-type: none"> General support for this policy
Response	<ul style="list-style-type: none"> Support welcomed

Comments relating to Policy HS18 – Improving awareness of domestic energy efficiency	
Summary of comments received	<ul style="list-style-type: none"> General support for this policy, but one representation has raised the question whether there is scope to target Community Energy Challenges at housing association tenants.
Response	<ul style="list-style-type: none"> The city council would welcome the opportunity to include housing association tenants within the Community Energy Challenge.

Comments relating to Policy HS19 - Improving awareness of domestic energy efficiency	
Summary of comments received	<ul style="list-style-type: none"> Support received for the city council’s plans to include Energy Performance Certificates as part of Choice Based Lettings property advertisements, including support from local housing associations.
Response	<ul style="list-style-type: none"> Support welcomed.

Comments relating to Policy HS20 – Supporting the affordable rent delivery model	
Summary of comments received	<ul style="list-style-type: none"> The council’s support of the new ‘affordable rent’ tenure is welcomed. One consultee welcomed ‘affordable rent’ as a means of maintaining the financial viability of development schemes. Support was also received for the council’s proposed flexible approach towards the application of affordable housing targets. However, some representations voiced concern about the sustainability of the affordable rent delivery model beyond the lifetime of the strategy due to the reduced financial capacity of housing providers
Response	<ul style="list-style-type: none"> Support, along with concerns about the sustainability of the affordable rent tenure, are welcomed and noted.

Comments relating to Policy HS21 – Enabling the delivery of the affordable rent tenure	
Summary of comments received	<ul style="list-style-type: none"> Support received for this policy. One representation commented that adopting a more flexible approach to tenure will go some way to ensuring that delivery is encouraged and promoted. Another representation stated that the overall target of 30% affordable housing should remain intact. Similar comments expressed concern that by taking a more flexible approach with regards to tenure split, developers may seek to use this to avoid the provision of onsite affordable housing. However, one consultee expressed a concern about this policy containing “no recognition” of the reduced viability of affordable housing development (along with the associated implications) in the short to medium term. The consultee states that the city council’s adherence to the 30% affordable housing policy is “unrealistic”.
Response	<ul style="list-style-type: none"> Text within the strategy to be expanded to reflect, and be consistent with, that of Core Strategy policy CS8, which states that viability will be taken into account when negotiating the percentage of affordable housing on a site by site basis.

Comments relating to Policy HS22 – Developing a Strategic Tenancy Policy	
Summary of comments received	<ul style="list-style-type: none"> Support received for plans to develop a Strategic Tenancy Policy.

Response	<ul style="list-style-type: none"> Support welcomed.
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Comments relating to Policy HS23 – Utilising public land as a catalyst for affordable housing delivery	
Summary of comments received	<ul style="list-style-type: none"> The release of land to support the delivery of affordable housing is welcomed. However, one representation calls for closer collaboration between the city council and the private sector to deliver housing. The consultee calls for the policy to be amended, stating that there is “no logical reason in restricting the release of these assets to housing associations”.
Response	<ul style="list-style-type: none"> The wording of this policy, along with policy HS6, will be amended to better clarify the city council’s approach towards the sale of assets and its plans to closely collaborate with housing association partners.

Comments relating to Policy HS26 – Preventing and alleviating rough sleeping	
Summary of comments received	<ul style="list-style-type: none"> Support received for this policy.
Response	<ul style="list-style-type: none"> Support welcomed.

Comments relating to Policy HS27 – Ensuring the continued provision of targeted housing-related support services	
Summary of comments received	<ul style="list-style-type: none"> General support for this policy, with some consultees expressing a willingness to support the city council in utilising Supporting People funded services to bring about measures designed to prevent homelessness. However, one representation requested details of the outcome of the Supporting People contract review that the strategy states was completed in June 2011
Response	<ul style="list-style-type: none"> Support noted. Strategy text to be updated to reflect latest developments with regards to Supporting People.

Comments relating to Policy HS31 – Future housing provision that caters for households with specific housing needs	
Summary of comments received	<ul style="list-style-type: none"> One representation stated that encouraging residential development to the Lifetime Homes Standard is “an aspiration that is supported in principle”. Due to the costs associated with meeting the requirements of Lifetime Homes, the universal roll-out of the standard could have a negative impact upon those trying to enter the private housing market by driving up price. Building all homes to Lifetime Standards is not financially viable or sustainable in meeting all residents’ needs.
Response	<ul style="list-style-type: none"> The recently published government Housing Strategy has removed the plans to roll-out the Lifetime Homes Standard by 2013. Instead, the Government has suggested that decisions regarding the provision of Lifetime Home units on developments should be made at a local level. The text of the policy will be amended accordingly.

Comments relating to Policy HS32 – Future housing provision that caters for households with specific housing needs	
Summary of comments received	<ul style="list-style-type: none"> NHS Peterborough’s plan to produce a Health and Social Care Accommodation Strategy is supported.
Response	<ul style="list-style-type: none"> Support welcomed.

Comments relating to Policy HS33 – Meeting gypsy and traveller housing needs	
Summary of comments received	<ul style="list-style-type: none"> Representation voiced concerns about the responsiveness of this policy to the city council’s ability to meet needs arising from any future growth in the gypsy and traveller population in Peterborough. Citing traveller cultural issues as a key factor, another representation raises concerns with the suitability of the provision of one large transit traveller site in the present proposed location at Norwood Lane. Instead, the consultee advocates that the provision of a number of smaller locations catering for smaller groups would be “the most appropriate course of action to consider”. Some representations made reference to a need for the city council to engage with local residents and stakeholders in order to recognise public concern with illegal encampments. Any local assessment of need should provide an indication of the rate of expansion required both for transit locations, but also for permanent locations.
Response	<ul style="list-style-type: none"> The policy relating to Gypsy and Travellers in the Housing Strategy reflects the council’s already adopted position in both its Core Strategy and its almost complete Site Allocations Document. The Housing Strategy is not proposing to change that policy position. However, it should be noted that the council continually monitors the situation and is always seeking a solution which best meets the needs of the Gypsy and Traveller community as well as the settled community. This could mean that, if a better site or sites are found, then the proposed safeguarded transit (or ‘temporary stay’) site allocated at Norwood Land would not be required (and therefore not implemented). A recent Gypsy and Traveller needs assessment (prepared in conjunction with Cambridgeshire County and District Councils) was concluded in late 2011. This assessment, which is available on the council’s website, did not identify such a high need for new permanent Gypsy and Traveller sites as to warrant the council to identify and allocate new sites through the planning system.

	<p>However, should a site be proposed by a private individual through the planning application process, then the council will consider it carefully in accordance with the council's criteria based Gypsy and Traveller policy as set out in the Core Strategy.</p> <ul style="list-style-type: none"> The Housing Strategy text will be updated slightly to reflect the up to date position, though there will not be a significant shift in policy compared with the version in the draft Housing Strategy as consulted upon.
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Comments relating to Policy HS34 – Ensuring a varied housing offer that supports mixed communities

Summary of comments received	<ul style="list-style-type: none"> One representation called into question the value of the city council's proposed 'integrated approach' towards affordable housing provision on new development as a means of encouraging mixed communities within the context of the financial viability of open market private sector housing and addressing anti-social behaviour. Grouping rented properties in close proximity generates economies of scale with regards to their management. There is potential conflict between the proposed 'integrated approach' to affordable housing provision and policy HS3 (Prestige Homes).
Response	<ul style="list-style-type: none"> The city council is strongly supportive of the effective and appropriate integration of affordable housing development into wider housing schemes as a means of promoting social cohesion and community sustainability. The benefits of an integrated approach to affordable housing provision is supported by research by the Joseph Rowntree Foundation. In terms of the financial viability of development schemes and supporting the development of prestige homes, an exception to an 'integrated approach' for development may be agreed where the council considers that the specific circumstances of a scheme merits an alternative approach that will benefit that particular development and the wider community.

Comments relating to Policy HS35 – Managing the growth of the Housing in Multiple Occupation (HMO) sector

Summary of comments received	<ul style="list-style-type: none"> The city council's recognition of the issues associated with Houses in Multiple Occupation (HMOs) is welcomed. Some comments urge the city council to take more urgent action to address residential amenity issues caused by HMOs in the centre of Peterborough, and request that the city council strengthens the wording of Policy HS35. However, one consultee commented that an Article Four Directive would not be an appropriate tool to address HMO issues in areas of the city where there have been long standing issues with this type of accommodation. The consultee claims that the focus upon HMO landlords is "unfair", given the prevalence of issues with other forms of rented accommodation in certain areas of Peterborough. Instead, the consultee recommends that the city council uses an alternative policy to manage over-occupation in owner occupied properties in the areas where issues exist.
Response	<ul style="list-style-type: none"> Support welcomed. The comment regarding the suitability of an Article Four Directive approach towards managing HMO growth in areas of the city with long standing issues are noted. However, as the wording of the policy does not specify the use of an Article Four Directive in a specific area of the city, the city council intends to retain this policy within the strategy as there may be scope for utilising Article Four in areas of the city where future HMO issues may arise. In response to suggestions that an alternative approach will be required to address issues of sub-standard privately rented accommodation in areas of the city with longstanding issues, an additional policy is proposed to be added to the strategy that relates to exploring the use of a 'selective licensing scheme' for rented accommodation in the 'Operation Can Do' area.

Comments relating to Policy HS36 – Ensuring the sustainability of rural communities

Summary of comments received	<ul style="list-style-type: none"> The Rural Communities see their children having to move away because of the lack of affordable homes and the policies that prevent this situation from being positively addressed.
Response	<ul style="list-style-type: none"> The city council is seeking to address the issue of a lack of affordable housing in rural areas through the work of the Rural Housing Delivery Partnership. This partnership is working to identify opportunities for affordable housing development within the constraints of national and local planning policy. The level of future development growth in rural areas is primarily defined through planning policy. The city council will give consideration as to how best to meet the needs of rural communities as part of any future review of local planning policies.

Comments relating to Policy HS37 – Supporting community-led housing solutions

Summary of comments received	<ul style="list-style-type: none"> One representation requested clarification as to what "continue to support" means within the context of the city council's stance on community-led housing initiatives.
Response	<ul style="list-style-type: none"> The city council is firmly supportive of community-led housing initiatives and the wider 'localism' agenda. The Housing Strategy sets out the city council's plans to support community-led housing solutions in various forms, including supporting the growth of Community Land Trusts through the Community Area Action Plan process, and through the continued work of the Rural Housing Delivery Partnership.

Comments relating to Policy HS39 – Affordable housing allocation policies that support mixed and sustainable communities	
Summary of comments received	<ul style="list-style-type: none"> • The refresh and review of the current Peterborough Housing Allocations Policy is welcomed. • One comment strongly advocates the creation of a policy that seeks to tackle welfare dependency and worklessness. • Another representation stresses a need to consider low to middle income earners within housing allocation policies, due to them being “squeezed from the home ownership market as never before”.
Response	<ul style="list-style-type: none"> • Comments noted. The role of the Housing Allocations Policy in tackling worklessness and welfare dependency, along with meeting the needs of low and middle income earners, will be considered as part of the refresh and review.

The following box outlines other comments which were received which were not specific to any individual policy.

Other comments	
Summary of comments received	<ul style="list-style-type: none"> • Strong support for the four objectives that form the basis of the Housing Strategy. • Taking into consideration the city council’s growth targets, one comment asks whether the city council expects to delivery keep pace with rising demand for social housing. • Referring to section two of the document, one comment asks the city council to include greater contextual information about the condition of the social rented stock in Peterborough, as opposed to the current focus upon the condition of private rented housing. • One representation requests that the city council utilises the Housing Strategy to set out how it plans to utilise s.106 contributions and the New Homes Bonus to support housing and infrastructure growth. • The strategy does not include details of specific support and/or the allocation of housing provision for service men and women. • Within the context of the objective to create mixed and sustainable communities, the strategy should set out the city council’s policy on housing density and space standards. • As a consequence of how the strategy is written, the document “leaves the feeling” that the city council’s success in meeting objectives 2, 3 and 4 is dependent upon meeting objective 1 (supporting the delivery of substantial yet truly sustainable growth). As a result, the strategy needs to address the issue of sustainability. • The housing strategy consultation refers to a steering group of key stakeholders. The group did not include community representatives. • The general approach appears to be the needs of the city rather than the Soke of Peterborough as a whole. The position of rural communities therefore remains largely unaddressed.
Response	<ul style="list-style-type: none"> • Support for the four objectives noted. • With regards to the condition of housing association owned stock, the city council will explore making additions to the text. • There are no present plans to utilise the New Homes Bonus to bring forward new affordable housing development. However, the city council plans to explore whether the income generated from the empty homes aspect of the New Homes Bonus will enable additional resources to be dedicated to bringing more properties back into use. • The city council has no immediate plans to provide bespoke assistance to service men and women, other than the statutory assistance that they are presently entitled to. Recent changes to homelessness legislation will work in the favour of service men and women who are based at Wittering but wish to settle in Peterborough at the end of their duty. • With regards to housing space standards and housing density, these issues are dealt with through the planning system and planning policy as opposed to the Housing Strategy. However, the comments are noted and the planning policy team of the council are considering whether a separate document covering these issues can be prepared during 2012. • Sustainability is a key theme within the Housing Strategy, as well as being a central consideration for the housing-related work of the city council. • The draft Housing Strategy was produced in conjunction with a group of key housing stakeholders and sector professionals. The remit of this group was to provide a steer and direction to the officers overseeing the production of the draft document. As part of the public consultation, community representatives have been granted the opportunity to comment on and feed into the draft Housing Strategy. • The city council disagrees with the comment that the Housing Strategy focuses upon the needs of the city as opposed to the whole Peterborough authority area. Unless explicitly stated otherwise, all policies within the Housing Strategy should be read as applying to the whole Peterborough authority area.

Draft Peterborough Strategic Tenancy Policy: Key Issues

<p>Summary of comments received</p>	<ul style="list-style-type: none"> • General support received for the Strategic Tenancy Policy, including support from many of the city council's key housing provider partners. • However, one representation raised concerns about the tone of the policy, and specifically questioned the need to include "a set of prescriptive demands" that the consultee claims already encompass the "raison d'être" for all housing associations. • The same representation requests that the city council amends the document so that the tone reflects the "collaborative approach" taken between the city council and its housing association partners in producing the policy. • With regards to the section of the policy entitled 'protecting tenant mobility', one representation called into question the feasibility of being able to ensure that social rented tenants will be able to retain their existing security of tenure if they choose to apply for and transfer to an alternative property that is designated to be let as an affordable rent property.
<p>Response</p>	<ul style="list-style-type: none"> • Support for the Strategic Tenancy Policy welcomed and noted. • The city council continues to hold extremely good relationships with its key housing provider partners, and it acknowledges the positive contribution that its partners make towards meeting the city council's own strategic objectives. • However, given the recent announcement that the Government plans to encourage new private 'for profit' entrants into the social housing market, the city council is keen to ensure that the wording of its Strategic Tenancy Policy is unambiguous and robust, yet fair and reasonable. • The city council will seek to ensure that its positive relationship with its housing provider partners is reflected within the final policy document. • The comment regarding tenant mobility is correct to note that where a property is advertised as an 'affordable rent' property and a social rent tenant applies for it, it would difficult to allow that tenant to retain their existing security of tenure. The city council will consider amending the wording of the policy to reflect the importance of facilitating an ongoing element of choice of rented tenures available to existing (and new) tenants within affordable housing provider's stock.

Other Proposed amendments

The following section sets out other potential amendments to the Strategy, to ensure the Strategy is up to date and reflects the council's intentions i.e. these changes may or may not be being made as result of a specific consultation comment.

Amendment	Reason
Details of new Government housing strategy added to section one of the document.	Since the publication of the draft Peterborough Housing Strategy, the Government has published its own housing strategy setting out its agenda for housing during the lifetime of the existing parliament. Details of the Government's new strategy will be added to the document.
Introduction of new policy relating to the possible introduction of a 'selective licensing scheme' for private rented accommodation in the Millfield and New England areas of Peterborough. Strategy text relating to housing enforcement updated and expanded upon accordingly to reflect this.	There are several strands that have fed into the creation of this new policy. Since the publication of the draft Housing Strategy, the city council has launched its Operation Can Do project in the Millfield and New England areas of Peterborough. As part of this project, the city council will be exploring how to utilise policy to address many of the social and environmental issues in these areas. The introduction of a 'selective licensing' scheme for all rented accommodation will be considered as part of this project. Furthermore, the city council received consultation comments that support a broader approach towards addressing housing issues in Millfield and New England, as opposed to the present focus upon HMOs.
Wording of policy HS6 and HS23 amended to better define the difference between the two policies	Some comments received during the consultation process alluded to some confusion over the differences between policy HS6 and HS23. The wording of these two policies has been amended in order to create a better distinction between the two.
Strategy text relating to policy HS6 amended to include reference to the city council being prepared to dispose of assets at a price below market value if doing so is considered to be in the best interests of the community.	This amendment has arisen out of comments received through the consultation process on the Housing Strategy, and discussions with the city council's Growth and Regeneration team.
Strategy text relating to policy HS6 amended to include reference to the city council being prepared to consider alternative payment mechanisms, such as deferred payments, for council land on a case-by-case basis	This amendment has arisen out of comments received through the consultation process on the Housing Strategy, and discussions with the city council's Growth and Regeneration team.
Wording of policy HS2 amended to include text emphasising the city council's plan to consult when producing a Community Infrastructure Levy Charging Scheme and Developer Contribution SPD	One consultation representation reiterated the need for the city council to consult when producing a Community Infrastructure Levy Charging Scheme and Developer Contribution SPD, and suggested alternative wording that slightly amends the emphasis of the existing policy. This wording is to be adopted for the purposes of the policy.
Wording of strategy text that related to policy HS21 amended so that it better reflects Core Strategy policy CS8, specifically that viability will be taken into account when negotiating the percentage of affordable housing on a site by site basis	This amendment has arisen from comments received through the consultation process.
Wording to text that relates to policy HS27 amended to reflect that Supporting Contract review is not yet complete.	This review is now scheduled to be completed by April 2012.
Wording of policy HS31 amended to remove reference to Lifetime Homes being a requirement of housing development from 2013.	Since the publication of the draft Housing Strategy, the Government has indicated that it no longer plans to legislate to make Lifetime Homes a requirement of all residential development beyond 2013.
Wording of strategy text relating to the Green Deal expanded upon	Now includes details of recently announced Government plans to enable private tenants to access the Green Deal scheme
Wording of strategy text that relates to policy HS25 amended	The national situation regarding the availability of funding for the Mortgage Rescue scheme has changed. Wording now reflects this.
Wording of policy HS39 amended to reflect new date for review of Peterborough Homes Housing Allocation Policy	Date for review removed from April 2012 to December 2012
Strategy text relating to policy HS32 and the planned Health and Social Care Accommodation Strategy altered	Date for publication of strategy has changed from June 2011 to April 2012.
Text relating to the retention of existing rights for social rented tenants in the Strategic Tenancy	Some comments received during the consultation period questioned the feasibility of the aspect of the policy that requests housing associations to allow their existing social rented tenants to retain their existing security of tenure when they transfer to an alternative

Policy has been altered.	property. The policy will be expanded to suggest that this could be achieved by ensuring that providers retain a “sustainable mix of rented tenures” that will “allow an element of choice of tenure type for both existing transferring and new tenants”.
Text reinforcing the collaborative approach between the council and housing association partners to develop the principles of the Strategic Tenancy Policy added to introduce section three of the policy.	This amendment has arisen from a comment received through the consultation process which expressed concern that the tone of the text in the policy did not reflect the collaborative approach involved in its development.
<p>Various amendments to bring the text within the strategy up to date, including;</p> <ul style="list-style-type: none"> • Removing reference to the Localism ‘Bill’, and replacing with details of the Localism Act • Removing reference to the ‘draft’ strategy • Tables and figures will be updated with more up to date data when it becomes available 	Localism Bill received Royal Assent in November 2011

Housing Strategy and Strategic Tenancy Policy Consultation Event Summary

On 17 November 2011, Peterborough City Council held a half day Housing Strategy and Strategic Tenancy Policy consultation event aimed at professionals working within the housing sector. This event was designed to provide partner agencies with an opportunity to gain a better understanding of the proposals set out in these two important documents, and to take part in a series of workshop sessions where many of the key housing-related themes in the documents could be discussed.

The following organisations and teams were represented at the Housing Strategy and Strategic Tenancy Consultation Event:

- Cross Keys Homes
- Hyde Minster
- Longhurst Group
- Axiom Housing
- BPHA
- Larkfleet
- Peterborough Streets
- Accent Nene
- Homes and Communities Agency
- NHS Peterborough
- Neighbourhoods team, Peterborough City Council
- Housing Strategy team, Peterborough City Council
- Housing Needs team, Peterborough City Council
- Housing Enforcement, Peterborough City Council
- Climate Change team, Peterborough City Council
- Planning Policy team, Peterborough City Council

The event was structured as follows;

- ❖ **Welcome and Introduction.** A brief welcome note written by Cllr Peter Hiller, Cabinet Member for Housing, Neighbourhoods and Planning, was read by Richard Kay, Group Manager – Strategic Planning, Housing and Environment
- ❖ **Overview of the draft Peterborough Housing Strategy 2011-15.** Anne Keogh, Housing Strategy Manager, gave a presentation on the draft Housing Strategy followed by a Q&A session
- ❖ **Overview of the draft Peterborough Strategic Tenancy Policy.** Matthew Hogan, Housing Strategy and Enabling Officer, gave a presentation on the draft Strategic Tenancy Policy followed by a Q&A session
- ❖ **Workshop sessions.** Attendees broke into four groups to each consider two of the following four topics as part of a workshop exercise:
 - What action should the council and its partners take to bring more empty homes back into use?
 - How should we respond to meeting the needs for specialist housing amongst vulnerable groups?
 - What needs to be done to address issues with Houses in Multiple Occupation and substandard accommodation in Peterborough?
 - What more can we do to prevent homelessness and reduce rough sleeping in Peterborough?

The main comments to emerge from these workshop sessions include:

- An identified need for specialist accommodation provision that meets the needs of:
 - Young people with disabilities
 - Those who reside in residential accommodation but require residential care
 - Those who are in between being able to live independently and those who need residential care
- A suggestion that the city council, NHS Peterborough and its housing association partners should seek to plan for the needs of specific residents at the development stage. This could be accompanied by early nominations to avoid costly adaptations post-completion.
- The city council should seek to create an empty property indemnity, similar to the model utilised under the Local Authority Mortgage Scheme, as a means of funding the refurbishment of long-term empty properties.
- The city council should seek to tie its empty homes work into other initiatives such as young offender rehabilitation programmes and apprenticeship schemes.
- The city council should consider the implementation of a 'selective licensing' scheme for all rented accommodation as a means of addressing social and environmental issues in certain areas of the city.
- There is a need to improve the accommodation options available to households in the city so that they do not have to rent from unscrupulous landlords.
- There is a need to educate tenants on their rights and how they can pursue them.
- In order to protect against debt and prevent homelessness, social landlords need to be seeking to identify which of their tenants are most likely to be adversely affected by the proposed changes to housing benefit rules and the introduction of direct payments through 'Universal Credit'.
- The introduction of 'Universal Credit' and direct payments is likely to have a profound impact upon the housing sector, from increases in homelessness through to higher borrowing costs for housing associations when funding new development.

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