

Peterborough Housing Strategy 2016 – 2021

Report on comments received in respect of the Consultation Draft version (November 2016) and a response to the Key Issues raised

Foreword

This document sets out a summary of the comments and issues raised at the Consultation Draft stage (November 2016 – January 2017) of preparing the Peterborough Housing Strategy 2016 – 2021 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 2016 – 2021. The consultation took place between 28 November 2016 and 16 January 2017. 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 an online consultation survey was published on Peterborough City Council's website. Emails were sent to a range of key stakeholders to make them aware of the consultation and inviting their feedback.
- 1.3. 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.
- 1.4. Some of the responses received 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.
- 1.5. 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.
- 1.6. In most instances, we have kept the comments as anonymous because what is said is more important than who said it.

Draft Peterborough Housing Strategy 2016-21: Key Issues

Comments relating to question one: Does the draft Housing Strategy cover all the main national and local policies and strategies in the National and Local Context sections of the document?	
Summary of comments received	<ul style="list-style-type: none"> The national and local context is well explained and clearly informs the four key priorities for the Peterborough housing agenda. The document details the opportunities and challenges provided by a range of current legislative changes relevant to the housing sector and the expected impact on the housing needs and demand in Peterborough. Some national policies have changed since this draft was written and these changes need to be reflected in the full strategy such as the Rents for High Income Tenants (Pay to Stay) policy and delays around the roll out of Voluntary Right to Buy to housing association tenants The national priorities are misguided. Suitable housing for people in the 3rd age is completely missing. National economic development needs to shift from the South East to the North and building should be focused on community not on just housing Neighbourhood planning is currently in spin - local people have little opportunity to influence the developers who are just in it for profit. Neighbourhood plans should form part of the key documents included in the diagram setting out the key local documents that inform and underpin the Housing Strategy – even though there are not any Neighbourhood Plans in place at present it is likely that they will begin to emerge within the life of the Housing Strategy
Response	<ul style="list-style-type: none"> Support, concerns and comments noted. Updates to the policy context will be updated to reflect changes since the publication of the draft Housing Strategy Neighbourhood Plans will be added to the Key Local documents diagram

Comments relating to question 2: Do you agree with the four key priorities identified for the Peterborough housing agenda?	
Summary of comments received	<ul style="list-style-type: none"> Agree. They are clearly linked to the expected continued economic and population growth in Peterborough from 183,961 to 227,870 by 2036 <p>Priority one: Supporting Substantial and Sustainable Growth</p> <ul style="list-style-type: none"> Disagree. Over the last 10 years we have seen the population of the city grow and services reduced. To pay for the increased population council homes have been closed, services reduced, property sold off. The reduction of services for the existing community will continue to go downhill with an increasing population. Disagree. Building more houses, particularly on agricultural land, increases the problem of self-sustainability for this country Disagree. Sustainable housing is key transformation of society. Growth is the thing that is wrong. <p>Priority two: Increase the supply of homes that people can afford</p> <ul style="list-style-type: none"> Affordable homes is not about 'Starter homes' that are inadequate for the needs of residents. Poorly designed housing has a real cost on a city's healthcare, crime and transport. Housing rent allowances too low. <p>Priority Three: Improve housing conditions to support health and wellbeing</p> <ul style="list-style-type: none"> This is a vital priority. Housing efficiency is a major climate change intervention. Any second home or rented property needs to add a lot more value to a city. The buy to let sector has created poor disconnected communities. Energy Grants by the LA need to be offered to local persons i.e. pensioners or on benefits where no charge is applied. <p>Priority Four: Supported and Specialist Housing</p> <ul style="list-style-type: none"> Specialist housing is important: the scale of development in this respect is inadequate. The elderly need a whole new sector of housing which helps with healthcare, prevents social isolation and frees up large homes with single occupants. It's not about old people's homes it is a new style of housing neighbourhoods that would attract retired people to continue to be effective participants in society

Response	<ul style="list-style-type: none"> • Support, concerns and comments noted. • Peterborough will retain its growth ambitions. The evidence associated with our growth targets justifies this level of growth. • Free solar PV panels are available to private sector residents in Peterborough and Green Deal grant funding is available to improve the energy efficiency of properties to reduce energy bills. PCC offer Repairs Assistance funding when excess cold is identified as a hazard due to inefficient/broken down boiler and central heating systems. • Peterborough's Market Position Statement seeks to address the housing needs of older people.
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Comments relating to question three: Do you agree with the actions identified to achieve each of the four priorities?	
Summary of comments received	<p>Priority one: Supporting Substantial and Sustainable Growth</p> <ul style="list-style-type: none"> • Support the use of s106 commuted sums to fund affordable housing provision in the City but this money is best used to provide direct grant rather than loans. Given that 40% of households cannot afford market housing (rent or buy) it is particularly important to secure the provision of affordable rented homes that may otherwise fail to attract grant funding from national or regional budgets. In addition, grant should also be used to ensure the provision of supported housing that currently requires higher levels of grant per unit due to the impact of the implementation of the Local Housing Allowance on supported housing rents on most supported housing. • It is unclear whether any statistics for owner occupiers with mortgages includes shared owners. Given that this is currently the fastest growing tenure type it would be useful, to have these numbers separated out, in order to ensure the needs of shared owners and potential shared owners are being catered for with all strategic decisions, and numbers can be monitored going forwards. • Large sites are not deliverable in timescales of demand as has been seen. More smaller sites need to be allowed and developed creating local employment and support. Not profit for large house builders or land owners Site from 10 to 45 units are good sites that can be turned around and developed quickly. • Commercial property should not be allowed to remain vacant if it has already been vacant for over one year. Vacant commercial property is also an eyesore and will attract no-one to this city. • Less growth, more quality and more transformation. • Don't build more houses
Response	<ul style="list-style-type: none"> • Support, concerns and comments noted. • It is intended that S106 funds can still be allocated as grant, each funding request will be considered on a case by case basis • Statistics indicating levels of shared ownership will be added. • Site allocation is undertaken as part of the development of the Local Plan. Sites for 10 dwellings or more are included in the site allocation process.
	<p>Priority two: Increase the supply of homes that people can afford</p> <ul style="list-style-type: none"> • The action point to increase the amount and type of temporary accommodation could be strengthened. There is a real need to develop a comprehensive and proactive strategy to tackle homelessness that includes: emergency accommodation; longer term TA (move-on accommodation); and support and life-skills training to prevent homelessness; and the 'revolving door' effect of repeat homelessness. • There is concern that the need to ensure that Starter Homes are featured in all new housing developments as acknowledged, will exclude both those whom are not eligible to purchase and those who cannot afford this option and that provision of new Starter Homes will affect the provision of affordable rented or shared ownership housing. • New funding programmes/initiatives being made available to deliver more homes for purchase is likely to result, as acknowledged, in a reduction in new homes offering

	<p>rented tenures - these two developments are likely to affect vulnerable groups adversely and disproportionately.</p> <ul style="list-style-type: none"> • There is concern that the statutory requirement to reduce social housing rents by 1% each year for four years will effect Registered Providers' revenue and that this may result in fewer resources being available to invest in the management and maintenance of existing stock and the provision of new affordable homes. • When the Housing Benefit capped at Local Housing Allowance rate for social housing tenants comes into effect, that more vulnerable people living in social housing who may experience difficulty finding employment, will be expected to contribute towards their rent from their own limited income. It can be anticipated that there will be an increase in those with rent arrears, or seeking loans and of potentially being at risk of and/or becoming homeless. Again, this is likely to affect vulnerable groups adversely and disproportionately. Welcome a response as to whether the increase in crisis presentations by people in regard to their ability to maintain their tenancy and/or potential increase in those presenting as homeless, has been scoped and addressed.
Response	<ul style="list-style-type: none"> • Concerns and comments noted. • Additional text in the National Context will refer to the new Housing White Paper. This indicates a shift in the government's new proposed policy position on Starter Homes • Additional text will be added to the strategy to reflect the council's recent successful bid for additional DCLG funding under the homelessness prevention trailblazer scheme. This funding will help to tackle homelessness by carrying out prevention activity earlier and working with a wider group of people – not just those who are owed the main homelessness duty.
	<p>Priority Three: Improve housing conditions to support health and wellbeing</p> <ul style="list-style-type: none"> • Cross Keys Homes strongly supports this priority. We would also be very interested expanding our own provision of a handyman service at preferential rates in partnership with PCC and continuing to expand the partnership working on assistive technology. • The aim to support health and wellbeing by various initiatives and partnership working is welcomed such as - by providing adaptations, assistive technology, repairs and maintenance work to enable people to live safely and more independently in their homes; and through the implementation of the Housing and Planning Act 2016 in tackling rogue landlords. • Can people if living in privately rented accommodation access adaptations to their homes if such adaptations, especially if structural, are resisted/declined by the landlord? If they are unable to access these adaptations, will the person be supported in finding more suitable housing? Providing aids and adaptations is often a central component to ensuring people can live independently for longer, avoid residential/nursing care and enable effective and timely discharge from acute health settings.
Response	<ul style="list-style-type: none"> • Support welcomed. • Funding for adaptations can be granted to people living in all tenures including private rented homes. If the accommodation is unsuitable for adaptation the household will be supported with moving to more suitable accommodation. Text will be added to the strategy to clarify this point.
	<p>Priority Four: Supported and Specialist Housing</p> <ul style="list-style-type: none"> • Very strong reservations about the proposal contained in the strategy and in the emerging local plan seeking all new build properties to comply with Category Two of Part M of the Building Regulations the following reasons: <ul style="list-style-type: none"> a) Category One of Part M is sufficient in itself to meet the needs of the vast majority of anticipated residents over the life time of the building. There is no evidence to show that lifetime homes (or their equivalent under the new regulations) have been adapted in significant numbers to meet the needs of existing residents. b) It will increase the costs associated with providing new homes by an estimated 10-15% (due to the additional works required in designing and building a structure that can be adapted in the future). c) Further costs will be incurred when building flat blocks, which will all require lifts regardless of the size of height of the block, or of the intended client group. This

	<p>additional facility will also increase service charges for residents needlessly.</p> <p>d) These additional costs and service charges will contribute to a worsening of scheme viability for affordable rented housing and is likely to lead to an overall reduction in the numbers of affordable housing provided in Peterborough, which is contrary to the other objectives contained in the strategy (and which may particularly be the case if it is more viable to deliver affordable housing in other local authority areas where this policy is not applied).</p> <p>It is suggested that the Council work with developers and RPs to provide an overall proportion of new homes to be specifically designed for households with special needs. This need not be done across every site, but rather should be done in a strategic way, balancing opportunities for provision with assessed housing need for various client groups.</p> <ul style="list-style-type: none"> • Fully support the commitment to build homes for older people with care needs but concerned that the supply of housing suitable for the over 65s without a current support need may be overlooked. The active are often looking to downsize, thereby freeing up larger homes for families, but we need to ensure there is suitable properties available to them, without resorting to sheltered accommodation. • The impending cap on supported housing rents to LHA levels has the potential to have severe impacts on both housing providers and tenants of existing schemes, and on new developments. There is a risk that social supported housing becomes unviable to providers and they seek different tenures when properties become void. There needs to be a clear strategy on how PCC will work with providers to support the existing supported housing and develop new, much needed specialist accommodation. • Needs more clarity on providing specialised housing for those in most need i.e. those who receive NHS Continuous Health Care (CHC) and live in the community. Life-time-homes standard housing are being used inappropriately for people with severe disabilities. • The strategy is well articulated and addresses supported and specialist housing needs for defined vulnerable groups including those with mental health issues. We await the Commissioning Accommodation strategy that will provide more detail and information about the tenure and accommodation needs of these vulnerable groups of people. • Welcome the clear commitment, in line with the 5 year forward view for mental health and as referenced in the Market Position Statement (MPS) on supporting people placed out of area in residential and hospital/secure settings, to be able to return to the City to live in community based independent settings. • In view of the expected growth in population, particularly people with support needs and the need to provide appropriate accommodation, it would be helpful to have comment regarding the links that are in place to address the effect on the City’s infrastructure and facilities in supporting and sustaining such growth and expansion – from access to the necessary levels of primary and acute health provision, social care provision, education, and the impact on the transport system. Of particular concern is the expected development of office accommodation into residential developments which does not need a planning application which would have previously considered such infrastructure issues. • Page 17 relating to Armed Forces Personnel; RAF Wittering is described as an army base There are Army bases close by outside Peterborough but it is likely that their personnel might feel a gravitational pull towards Peterborough as the nearest major town/city.
<p>Response</p>	<ul style="list-style-type: none"> • Support, comments and concerns noted. • The proposals regarding extending Category Two of Part M of the Building Regulations to all new build properties will be considered as part of the outcome of the consultation on the emerging Local Plan. • The Local Plan considers infrastructure needs as part of the process of allocating sites for new housing. In the National Context section of the strategy we have

	<p>highlighted the challenges that permitted development rights which allow conversion of office accommodation to residential present in terms of ensuring that homes are developed in areas with appropriate infrastructure.</p> <ul style="list-style-type: none"> • The text relating to RAF Wittering will be corrected.
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Comments relating to question four:
Are there any key actions missing that would help deliver the priorities?

Summary of comments received	<ul style="list-style-type: none"> • Provide finance to educate and incentivise people to have fewer children. • The ability for people to work from home is a vital part of the emerging future - preventing the need to travel and creating more viable communities. It is not a housing strategy it is a community strategy - housing leads to development for profit as the priority. • The priority today is not more housing, it is about transforming communities to address the issue of climate change today, changing needs of young and old populations, radically reduce the cost of dwellings through factory fabrication methods and create communities that do not have the need to commute. • Peterborough needs to significantly improve its city walking and cycling. It may be better than many cities however it is a long way from what is possible and what is needed. • More detailed study needed of who is on the waiting list + closer working with NHS CHC team as to who is living in Peterborough that need more specialised housing and are not getting it. • I would like to see that disabled people and older people are given a chance to tell the council what they need and how their present accommodation is not working for them. I think the council would learn a lot. Education of council personnel on the key differences in the build standards between PrtM4(2) and what is really needed (3b) + some common sense re some of the min dimensions which are a joke in both for electric chair users. Peterborough has failed to provide adequate housing for the most in need in this city and I do not see anything in this document that will correct that failure. • In promoting health and wellbeing, and sustainable development it is often the case that the large social housing provider (Cross Keys) which took over the council's stock, provides a programme of enhancements such as external insulation; solar panels replacing old boilers and old windows and doors. It would be an excellent opportunity if the contractors and Cross Keys could also offer the same refurb or enhancement to the private houses at the same time as they are doing the social housing on the same estate. There would be savings for the owners and where these are private landlords, this would be beneficial for the private tenants. The look of the areas would be enhanced as there will be fewer 'tatty' looking homes amongst the refurbished Cross Keys homes, promoting a self of pride in an area (sadly lacking on many estates). It makes sense because the houses tend to be of standard design so there's an economy of scale which can be passed on to all concerned.
Response	<p>Comments and concerns noted.</p> <ul style="list-style-type: none"> • The council is taking a more active role in tackling long term empty sites to bring forward regeneration through the Peterborough Investment Partnership. • Good partnership working arrangements between the council and Cross Keys Homes means that where possible we try to ensure that complimentary funding opportunities are made available in neighbourhoods where improvement programmes are being undertaken.

Comments relating to question five:
Are there any comments that you would like to make on the draft Housing Strategy that are not covered in the previous questions?

Summary of comments received	<ul style="list-style-type: none"> • The only specific attention to rural areas is mention being made to rural exception sites and fuel poverty especially in Barnack Ward. The response to the latter is to improve
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	<p>housing conditions and providing access to thermal efficiency measures but this does not indicate how fuel poverty will be tackled only suggesting measures that will ameliorate but not resolve.</p> <ul style="list-style-type: none"> • An essential consideration of housing development in rural areas is infrastructure. Rural infrastructure both in terms of transport links and services may not be compatible with the desire to expand village boundaries to encourage development. The majority of the Strategy seems to be consumed with providing houses for those in need which is admirable in itself but appears not to recognise the needs of established communities especially those in rural areas. • I would like to see more focus on middle aged to elderly people being assisted to downsize property as they age to free up family sized housing stock • As one of the UK's fastest growing cities, a housing strategy for Peterborough must take into account derelict and vacant commercial property. PCC can take authority on this and should do so before any evictions of residents in order to build new housing. • We are pleased that the specific problems of housing provision in rural areas have been acknowledged in the Strategy. We also concur with the comment that the Right to Buy for registered provider tenants could lead to a shortage of homes for needy households. The Housing Strategy suggests a number of ways in which the shortage of accommodation will be addressed, including the creation of Medesham Homes, the new joint venture between Peterborough City Council and Cross Keys Homes. We would welcome an explanation in the Strategy of how the partnership will achieve its aims. We are also interested in the City Council's reasons for preferring this approach over a return to the old policy of building council houses. • The allocation of £14.6m to support affordable housing provision by Medesham Homes is good news, as is the proposal to ring-fence funds from developer contributions paid in lieu of providing affordable homes. We are also pleased that the devolution proposal for the new Combined Authority of Cambridgeshire and Peterborough includes £170m towards delivering affordable housing. A statement on how far these contributions will go towards satisfying the need for affordable housing in Peterborough would be appreciated. • We support the undertakings in the draft strategy to ensure that new developments provide a mix of housing tenures; that new build affordable rented homes provide the appropriate mix of house types and to encourage capital raised as a result of Right to Buy or the reduced regulation of social housing providers to be reinvested, to provide new affordable homes for rent. However, Barnack Parish Council has serious reservations about the undertakings to support the planning policy which sets the threshold for providing new affordable homes on sites at 15 or more dwellings and to support the delivery of rural exception sites. We feel that in rural areas there should be no minimum size stipulated for a development to qualify for support to include affordable housing. Instead, we would prefer the building of affordable homes to receive support no matter how small the development. This may mean offering proportionally larger economic incentives to small-scale developers of affordable dwellings in rural situations. We are concerned about the strong promotion of rural exception sites. We feel that this weakens the concept of the village building envelope. We would like to see a proviso added, to the effect that building affordable housing outside a village envelope is only acceptable where exceptional need is proven and this need cannot be met by building within the envelope. • Barnack Parish Council broadly endorses the draft Housing Strategy and congratulates Peterborough City Council on its analysis of the problems and its constructive approach to solving them.
Response	<ul style="list-style-type: none"> • Support, comments and concerns noted. • A more detailed description of how Medesham homes plans to achieve its aims can be found in the Cabinet paper of 25th July 2016.. Since the Large Scale Voluntary Transfer in 2004 of the council's housing stock to Cross Keys Homes we no longer has the in-house skills in housing management and development to take on the full landlord role

	<p>again. Cross Keys Homes was a logical choice for partner for a housing joint venture, as the largest residential social landlord in Peterborough and a strategic partner the Council works with extensively already.</p> <ul style="list-style-type: none"> • The policy that determines the threshold for providing new affordable homes and the delivery of rural exception sites are part of the existing Local Plan and will be refreshed as part of the emerging Local Plan. Viability informs the threshold for affordable housing provision and therefore determines whether smaller sites can sustain an affordable requirement. The council's rural exception site policy already makes clear that a site will only gain permission where a strong local need is identified and where need cannot be met through the usual planning policy channels.
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Comments relating to Question six: Is the strategy easy to read?	
Summary of comments received	<ul style="list-style-type: none"> • Yes • Detailed but accessible.
Response	<ul style="list-style-type: none"> • Support welcomed.

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
Update text in National Context section to include reference to the new Government White Paper 'Fixing our broken housing market'	Since the publication of the draft Peterborough Housing Strategy, the Government has published this White Paper which although not yet a statutory document, will impact on the housing agenda for Peterborough once enacted. Confirmation added that the National context of the strategy will be reviewed on a regular basis to ensure it remains up to date
Update text in National Context section to reflect changes in government policy since the draft Housing Strategy was published.	The policy plans relating to 'Rents for High Income Tenants' will no longer be a requirement for Registered Providers and therefore reference to this policy will be removed. The roll out of the policy regarding 'Right to Buy for Registered Provider Tenants' have been delayed so the text has been amended to reflect this.
Update diagram in the Local Context to include Neighbourhood Plans in the list of local key documents that underpin the housing strategy	This amendment has arisen out of comments received through the consultation process on the draft Housing Strategy
Strategy text relating to Priority One: 'Supporting substantial and sustainable growth' under the heading 'Key Peterborough snapshot facts' add statistics regarding shared ownership	This amendment has arisen out of comments received through the consultation process on the draft Housing Strategy
Strategy text relating to Priority Two: 'Increase the supply of homes which people can afford' amended to include reference to the new homelessness prevention initiatives funded by successful DCLG bid	This funding has been awarded since the publication of the draft Housing Strategy. New text to explain the impact of the funding and respond to comments received through the consultation process on the draft Housing Strategy.
Strategy text relating to Priority Three: 'Improve housing conditions to support health and wellbeing' amended to include information about access to adaptations funding.	This amendment has arisen out of a query received through the consultation process on the draft Housing Strategy.
Strategy text relating to Priority Four: 'Meeting the needs of other vulnerable groups' under the heading Armed Forces Personnel corrected	This amendment has arisen out of a comment received through the consultation process on the draft Housing Strategy
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.

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