

# **Draft Peterborough Housing Strategy 2024-29 Public Consultation**

## **Report on Key Issues Raised**

**March 2024**

**Peterborough City Council**

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This document sets out a summary of the comments and issues raised at the Consultation Draft stage (22 January – 4 March 2024) of preparing the Peterborough Housing Strategy 2024 – 2029 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 wishes to thank those who took the time to respond to the public consultation on the Draft Peterborough Housing Strategy 2024 – 2029. A total of 40 consultation responses were received. We were pleased to receive feedback from stakeholder partners and from individuals. The list of stakeholders that participated is set out below

Greater Peterborough Network (PCT)	Family Voice Peterborough
PCC Leaving Care Service	Longhurst Group
Accent Housing	Persimmon Homes (East Midlands)
Centre 33	Peterborough Civic Society
Church Commissioners for England	Sutton Parish Council
CPCA	Ufford Parish Council
Cross Keys Homes	West Suffolk Council
Eye Parish Council	Public Health

- 1.2. All responses received during the consultation period have been read and given due consideration as we prepared the final version of the Housing Strategy for adoption.
- 1.3. 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.
- 1.4. The majority of responses received were submitted through the online survey. Some were submitted via email. The comments provided through both channels are reflected in this document.
- 1.5. 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.
- 1.6. 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.
- 1.7. In most instances, we have kept the comments anonymous within this report because what is said is more important than who said it.

Do you agree or disagree that delivering sustainable growth and regeneration should be a priority for the Peterborough Housing Strategy 2024-2029?

78% of respondents agreed with this priority  
0% neither agreed nor disagreed  
19% of respondents disagreed with this priority  
3% were unsure

Do you think that we have set the right actions to achieve this priority?

The majority of responses received agreed with the actions set to achieve sustainable growth and regeneration. Comments in support included:

- Persimmon Homes (East Midlands) accepts and supports the actions set out in this priority of the housing strategy.
- All relevant actions
- Yes, Within the political and financial constraints
- The Church Commissioners for England (“CCE”) notes the importance of setting clear and ambitious aspirations to align with future aims around both housing and economic growth and believe that the actions listed to deliver Priority 1 will be successful in assisting with the delivery of sustainable growth and regeneration across the district.
- Particularly supportive of the actions to refresh the Local Plan and unlock the Middleholme site.

Some of the responses supporting the actions included additional comments and suggestions which have been summarised below:

- The right actions but there is a lack of consideration to local infrastructure requirements. No information on site locations
- there should be more emphasis on key worker housing and retirement housing. Encourage more affordable and community led housing to reduce reliance on private landlords
- Yes, but concern about the lack of suitable land to deliver housing and the rise in build costs, which have made it more difficult for affordable housing providers to compete in the housing market.
- It is Important that consultation is carried out on any proposed Design Code. Request an action that addresses suitable growth options for new market homes and demonstrates availability of land for new housing allocations.
- There is a need to be mindful of regulation and statutory changes impacting on viability
- It is Important not to underestimate the role of private sector housing land in delivering housing to meet a range of housing needs and demands as well as infrastructure for communities provided through large scale sites. Support from the Planning Service for strategic sites progressing through the planning system would assist PCC in achieving its existing and emerging climate change aspirations, as well as assist in delivering on the actions of Priority 1 of the Housing Strategy
- Support but is there enough in terms of mitigating climate change?

A significant minority of responses received disagreed with the actions set to achieve sustainable growth and regeneration. Some provided additional comments and suggestions which have been summarised below:

- Health Care, Social Care, Utilities, Transport and Recreation needs to be addressed before further housing is considered.
- Why does our city have to just keep growing? That is unsustainable.
- Is growth deliverable in terms of land availability, capacity in the construction industry and viability?
- A continuing pro-growth strategy is not sustainable

Other comments received included:

- Regeneration of empty houses, and building of affordable social housing should be priority
- housing need should be main criteria not economic status
- consider including an action that monitors progress with the delivery of net zero and regeneration that is sustainable
- Setting actions does not mean they will be delivered

#### Response to consultation feedback

Support, concerns and comments noted.

As a Local Planning Authority, we have a statutory obligation to establish the number of new dwellings required to meet local housing needs over the period of the Local Plan. This calculation is made using the national standard method set by the government. Therefore, Peterborough will retain a growth target.

Ensuring that growth is deliverable through identifying available sites is a key function of the Local Plan. Sufficient suitable land is allocated through the site selection process to facilitate our growth target and to provide an additional buffer in the event that some sites do not come forward in the expected timescale.

A call for sites as part of the development of a new Local Plan resulted in 138 sites being put forward for consideration. Each site will undergo a detailed assessment process to determine if the site is suitable for proposed allocation in the Draft Plan.

We recognise the need to ensure homes are developed in areas with appropriate infrastructure that can support current and future residents. Planning plays a central role in coordinating the delivery of infrastructure to serve both new and existing development. The Local Plan provides a strategic overview of infrastructure needed and identifies the infrastructure requirements to support growth. Development Management regulates, sets conditions and raises revenue for infrastructure through the planning obligations imposed at the stage of granting planning consent.

It is intended that a formal consultation will be carried out on a Design Code for Peterborough.

The draft Local Plan will include a policy setting out overarching climate change principles that development should seek to achieve and will be consulted on later this year. A city-wide Climate Change Action Plan is also currently being prepared which will include monitoring emissions in Peterborough, including from housing. Actions to mitigate the impact of climate change will form part of this plan.

Regenerating empty homes, delivering affordable housing and addressing the housing needs of specific groups are addressed in the later sections of the housing strategy under the related identified priority.

Do you agree or disagree that increasing the supply of homes that people can afford and tackling homelessness through early help and prevention should be a priority for the Peterborough Housing Strategy 2024 to 2029?

76% of respondents agreed with this priority  
 5% neither agreed nor disagreed  
 16% of respondents disagreed with this priority  
 3% were unsure

Do you think that we have set the right actions to achieve this priority?

There was a mixture of opposing views and opinions on the actions set to achieve increasing the supply of homes that people can afford and tackling homelessness through early help and intervention.

Comments in support included:

- CCE agrees with the actions of Priority 2
- Persimmon Homes (East Midlands) supports the actions set out for this priority.
- Yes, there needs to be a focus on working with strategic landowners and housing associations to help increase delivery of affordable housing.

Some of the responses supporting the actions included additional comments and suggestions which have been summarised below:

- Yes, but there is a need to ensure that affordable homes are in accessible locations especially when considering rural locations. Easy and affordable access to workplaces, facilities and family is important.
- Agree but need to ensure that a variety of tenures (Rent to Buy, Discount to Market Value, First Homes etc.) are all available
- Agree but explicit reference should be made to the role of the private sector in delivering affordable housing provision within the district and highlight continued support for existing and future large-scale allocations and their role in delivering affordable homes
- Would it be better to offer an alternative tenure split to encourage Social Rent?
- As part of increasing the supply of affordable housing it states that you intend to achieve 70% rented. Does this include affordable and social rent?

Some of the responses disagreeing with the actions included additional comments and suggestions which have been summarised below:

- housing affordability in Peterborough is distorted by newcomers moving to the area with greater spending power because they work in London.
- There are thousands of flats in our city. If there were more opportunities to move up to traditional homes at an affordable price this would free up the number of flats in the area.
- housing affordability for single people in employment is exacerbated by the cost of living increases. Even shared housing is unaffordable. Cap market rents to manage escalating rent levels.
- What does the 'early intervention and prevention look like? Have single homeless people been considered throughout the document.
- the definition of "affordable" being 80% of open market price, is unaffordable to many
- Doesn't go far enough but I understand the constraints faced by the council

Other comments received included:

- It is difficult to see a continuity between affordability and homelessness. The flow should be low-cost rent homes, social housing, affordable, first-time buyers and onto a mix of homes to suit buyer demand
- Many young people do not know in advance that they will be homeless or how to access early intervention help to prevent it
- How will an increase in homeless preventions be achieved? should there be an action around partnership working to identify household in need early?
- Supported Accommodation should be available for those unable to sustain a tenancy
- More focus on affordable housing for all
- Will the impending change of administration in May 2024, and every year in Peterborough, cause further delay to the strategy implementation and more importantly building of affordable housing?

Response to the feedback provided

Support, concerns and comments noted

The tenure mix of 70% affordable rented and 30% shared ownership tenure homes that we currently seek for affordable housing delivered through Planning obligations on market led housing schemes is informed by the Housing Needs policy in the adopted Local Plan. This policy was shaped by a Housing Needs Assessment and the impact of affordable housing requirements on the viability of new market housing schemes.

As part of the evidence base for preparing the new Local Plan a new housing Needs Assessment has been commissioned as well as an updated viability assessment to ensure that the combined contributions sought from developers through the policies of the Plan are sustainable and deliverable. The outcome of these studies will form the Planning obligations affordable housing tenure requirements tenure of the Housing Needs policy in the draft Local Plan and will be consulted on later this year.

Affordable homes delivered through other routes such as land-led affordable housing schemes initiated by affordable housing providers, or additional affordable housing provided on market led schemes with the aid of grant funding, have more capacity to provide a wider tenure mix that includes social rent and other affordable home ownership tenures.

As a local authority, we ask that Affordable Rent levels (which can be set at up to 80% of the equivalent local market rent) be capped and Local Housing Allowance (LHA) rates to keep them as affordable as possible. We include this requirement in our S106 Agreements to give it greater weight. Capping rent levels in the private rented sector can only be imposed through national policy and legislation. The response on rent capping from the government is that rent controls in the private rented sector would discourage investment and lead to declining property standards.

The Homelessness and Rough Sleeping Strategy which underpins the housing strategy sets out the detail of the council's approach to early intervention and homelessness prevention. It has a strong focus on partnership working with the voluntary, statutory, community and faith-based services as a means of identifying households at risk of homelessness at an early stage. Delivery of this strategy is monitored through monthly Partnership meetings. We continue to work with our partners to identify funding and resources to support the delivery of our preventative services.

**Do you agree or disagree that raising housing quality and standards in existing homes should be a priority for the Peterborough Housing Strategy 2024 to 2029?**

87% of respondents agreed with this priority  
5% neither agreed nor disagreed  
8% of respondents disagreed with this priority  
0% were unsure

**Do you think that we have set the right actions to achieve this priority?**

The majority of responses received agreed with the actions set to achieve raising housing quality and standards in existing homes in the Peterborough. Comments in support included:

- Yes. Housing standards need to improve
- Yes, it seems a structured Plan
- We think you have set good actions here.
- The actions set out seem to be a logical response, assuming that funding is available
- Persimmon Homes (East Midlands) agrees with the actions set out for this priority.
- CCE agrees with the actions of Priority 3 in respect of raising housing quality and standards in existing homes.
- What I see is a step in the right direction

Some of the responses supporting the actions included additional comments and suggestions which have been summarised below:

- Yes, although you should look to understand current standards and focus on the areas not being met.
- Yes, Has the cost of raising standards been assessed and is it feasible?
- Agree with the actions but need to be mindful of the costs involved with new technologies and the importance of educating the resident how to effectively use them to ensure they are beneficial
- Agree, but the priorities of the Housing Strategy should go further, to ensure that all new housing that is delivered is also energy efficient and high-quality giving more consideration to the role of the private sector in responding to climate change. Specifically large-scale sites such as urban extensions, can provide high quality new build homes with strong environmental credentials.
- a good effort, but more could be done.

A small minority of responses received disagreed with the actions set to achieve sustainable growth and regeneration. Some provided additional comments and suggestions which have been summarised below:

- Not on past experience of recent developments. Developers are building cramped poorly designed estates that lack the facilities that encourage building communities. Include retirement housing to ensure a mixed community
- No, you actually have to enforce policies and focus on anti-social behaviour and the wider neighbourhood
- Disagree. Concern about the potential for a large development in Wittering and its impact on infrastructure, wildlife and the natural environment

Other comments received included:

- Quality attracts cost. Is this affordable?
- How is this going to be implemented?
- Need to monitor new builds more. Too many are riddled with major faults. Regulate them same way as social housing is inspected
- Tackling damp and mould need to be a priority,
- More focus on retrofitting and making homes warmer
- the emphasis should be on the provision of decent homes by social housing providers rather than trying to persuade property-owners to spend more than they are willing on upgrading homes

## Response to the feedback provided

### Support, concerns and comments noted

The focus of this priority and its actions is raising standards for the existing housing stock. Raising the standards required for new build homes will improve future housing conditions and help mitigate the impact of climate change. Requirements for build standards for new developments will be considered as part of the policies being prepared for consultation in the draft Local Plan.

The affordability issues related to retrofitting and improving the energy efficiency of existing homes is acknowledged. At a national level, a recent change to eligibility rules for the Home Upgrade Grant that increased the maximum income threshold for the grant to £36,000 has increased the eligible pool of Peterborough households who can access free energy saving upgrades by nearly 20%

Information about grants and other assistance for low-income and vulnerable households is available through a range of initiatives that are described under the heading Addressing Fuel Poverty in the chapter for Priority 3 and the heading 'Home Service Delivery Model' in the chapter for Priority 4.

The council is committed to using its enforcement powers to protect standards in the private rented sector when needed. In April 2024 the landlord of a privately rented property in Peterborough was fined for allowing people to live in a property with serious structural issues, dangerous wiring and a lack of fire safety measures. The Housing Standards Team had served an order prohibiting the use of



the dwelling for residential purposes until works could be completed and failure to comply with the order resulted in prosecution.

Do you agree or disagree that meeting the need for accessible and adapted housing, supported accommodation and housing for specific groups should be a priority for the Peterborough Housing Strategy 2024 to 2029?

87% of respondents agreed with this priority  
8% neither agreed nor disagreed  
5% of respondents disagreed with this priority  
0% were unsure

Do you think that we have set the right actions to achieve this priority?

The majority of responses received agreed with the actions set to meet the needs for accessible and adapted housing, supported accommodation, and housing for specific groups. Comments in agreement included:

- Persimmon Homes (East Midlands) agree with the actions set out for this priority
- CCE agrees with the actions of Priority 4
- Yes, to help people with disabilities
- Yes, within the political and financial constraints,

Some of the responses supporting the actions included additional comments and suggestions which have been summarised below:

- Yes. Need to do more joined up working with social and private landlords to understand what stock we have in Peterborough.
- Will need to do a lot more joined up working with other organisations, PCC can't do it alone.
- Agree with the actions set out for this priority. As a developer, early input and feedback from the local authority on the design of dwellings as well as the type and tenure of homes needed is appreciated to avoid issues later in the development lifecycle
- Yes. The concern for RPs on supported accommodation is more about Revenue Funding,
- Agree but not at the expense of being able to deliver general needs properties to building regs standards.
- CCE agrees with the actions but when looking how to meet the needs of an ageing population, as well as specific groups, there is currently no mention of the role of the private sector or strategic scale development in delivering accessible and specialist housing within wider inclusive and sustainable neighbourhoods.

A small minority of responses received disagreed with the actions set to meet the needs for accessible and adapted housing, supported accommodation, and housing for specific groups. Some provided additional comments and suggestions which have been summarised below:

- No. There is nothing in the plan that looks at support for single 18–25-year-olds, who are vulnerable cohort.
- No. Too many people are 'just below threshold' for having their needs met. There is also too little understanding of various disabilities, and not enough support for those who would struggle to maintain a tenancy
- Probably insufficient

Other comments received included:

- I do not know what the demand is.
- I have concerns over private rentals and HMOs

- Are there sufficient resources for the many groups that have been mentioned? For example, rough sleepers are still quite prominent in the city centre.
- Need to Identify how you intend to meet the needs of older people, people who need adaptable and accessible housing and Gypsy Traveller Accommodation Needs. Will this be through the Local Plan?
- Increased Supported Accommodation for those unable to manage/sustain a tenancy is a priority for those leaving prison, those with dual diagnosis, substance misuse support needs.
- Housing specific to care leavers is a priority, those aged 16-18 should be encouraged to remain with family wherever possible.
- Accessible and Adapted housing for those individuals with physical, learning disability support needs is an additional priority.

### Response to the feedback provided

Support, concerns and comments noted

Meeting the accommodation needs of Gypsy, Traveller and Travelling Show People will be considered in a specific policy within the draft Local Plan which will be consulted on later this year. The policy will be informed by the outcome of Gypsy and Traveller Needs Assessment that has been commissioned and is currently underway, and national policy.

Meeting the accommodation needs of vulnerable groups including older persons and people who need adaptable housing and accessible housing, will also be considered in a policy focussed on meeting the housing needs of vulnerable groups in the draft Local Plan. The policy will be informed by the outcome of the Housing Needs Assessment that is currently underway.

Adult Social Care Commissioning lead on the commissioning of care services and accommodation for older persons, people with learning disabilities, autistic people and people with mental health needs informed by their understanding of existing supply and current and future demand.

Support for rough sleepers, those at risk of rough sleeping and people with substance misuse dependencies are provided through commissioned services. These partners provide ongoing tenancy support to help sustain tenancies.

Support for vulnerable single people is available through the channels described above. Young people in the 18-25 years age group have access to the housing register to apply for social housing if they meet the eligibility criteria

### Are there any additional comments you would like to make on the draft Peterborough Housing Strategy 2024 to 2029 that are not covered in the previous questions?

The comments received have been summarised by theme below:

#### **Growth and Regeneration**

- Housing should be built on brownfield sites and not in the countryside where there is a lack of supporting infrastructure and puts the country in risk of food shortages
- Build on brown field sites not green field site, focus on the city not the countryside.
- New affordable housing is a priority, but it shouldn't be at the expense of things such as greenfield sites and smaller communities being destroyed as they have no infrastructure.

- More focus on housing for local people rather than building luxury housing to attract people to Peterborough
- CCE reiterates the importance of ensuring the strategic context of the Peterborough Housing Strategy 2024-29 aligns with both the adopted Local Plan as well as the aspirations of the emerging Local Plan.
- concerns about proposed level of growth in the emerging Local Plan with particularly a site proposed to the council for a large-scale development at Wittering
- the fundamental problem is extending the plan by 4 years and this ridiculous view that being one of the top growing communities is a badge of honour or a good thing. This is not the view of the majority of the Peterborough community especially the rural community.
- Concern about the negative impact of HMOs and private rented housing on communities where landlords fail to manage the tenants. More affordable housing and key worker housing is needed. Ensure new developments are designed with adequate roads from the outset to avoid the problems experienced at Hampton. Ensure that areas set aside for outdoor leisure facilities are retained in the new local plan.
- Concern about the number of office conversions into flats. People want houses. Grow our city outwards creating new districts and joining up villages
- put a moratorium on building more houses until infrastructure and services are improved
- Before building more homes, we should focus on improving infrastructure and facilities
- There is no mention of the constraints imposed by inadequate infrastructure.
- Concern that developers are not delivering the community resources that they promise at the planning stage
- further assurance on how better access to market homes is going to be achieved, is needed. This could be in the form of updating new growth option studies, for example.
- Commercial constraints make it more challenging to deliver 1 and 2 bedroom flats than to deliver housing. This should be borne in mind when setting policies and targets.
- New homes should all be prefabricated timber framed with the level of insulation that is the norm in Sweden. Supervise the construction and the tradesmen carrying it out to the level common in Germany

### **Response to Growth and Regeneration comments**

The growth of Peterborough, the allocation of appropriate sites to facilitate growth, and the provision of infrastructure, are key functions of the Local Plan.

A response to the comments on this topic is covered in the previous response to consultation comments for Priority 1: Growth and Regeneration.

The management of HMO dwellings and the wider private rented sector is a priority for the council and is addressed under Priority 3 in the housing strategy

The conversion of office accommodation into flats is classed as permitted development under national planning policy. This means that that in most circumstances, a developer will not require planning permission when converting office space to homes. Developers do need to apply for what is known as 'prior approval' however, this must be granted if the proposed conversion meets the required criteria.

### **Affordability and tackling Homelessness**

- cap market rents to improve affordability.
- House prices are unaffordable and affordable rent is unaffordable
- There is a lack of affordable options for single working people looking for housing in Peterborough

- Partnership working with RPs in particular needs to be strengthened. Particularly where addressing homelessness is concerned.
- CKH has highlighted many occasions where our hostels have vacancies and yet we see the use of bed and breakfast increasing.
- Homeless residents in temporary accommodation have found themselves placed in band 3 although they are owed full housing duty. They are trapped in Temporary Accommodation which is resulting in the dwindling supply of this type of accommodation

### **Response to Affordability and tackling Homelessness comments**

Concerns and comments noted

The council is working to strengthen our partnership working as part of tackling homelessness and we are currently in the process of reviewing the various partnership boards and group meetings that are in place at both a strategic and operational level. Sessions with partners to review the strategic groups has already commenced.

Reducing vacancy rates in hostels has been a priority for the council and this issue has now been largely addressed. However, there are occasions when complex clients cannot be offered vacant hostel rooms, and our approach is to only resort to using B&B as temporary accommodation when it is not possible to place in either hostel or self-contained temporary accommodation.

Following consultation with our partners, the Housing Allocations policy was changed in March 2022 to reflect a change in the Housing Needs Service approach to become more prevention focused. Part of this approach has been to encourage and assist households threatened with homelessness to remain in their home for as long as possible. Households at risk of homelessness have been given a higher priority on the housing register with a view to preventing the need to enter temporary accommodation. The new policy has now been in place for sufficient time to evaluate the impact of the changes. A review of the Housing Allocations policy will take place within the next 12 months in consultation with our partners to understand what has worked or has not worked and determine if a refresh is required.

### **Housing for Specific Groups**

- There is a lack of supported accommodation specifically for young people in the area.
- There is not enough social housing to accommodate vulnerable young people and the support offered is not always appropriate for their needs. They are often left with prohibitive private rented housing as the only option

### **Response to Housing for Specific Groups comments**

A response to the comments on this topic is covered in the previous response to consultation comments for Priority 4: Meeting the need for adapted housing, supported accommodation and the needs of specific groups.

### **Other Comments**

- the strategy has addressed the aims and objectives of the Health and Wellbeing Strategy in relation to health and housing issues

- The Civic Society welcomes the draft Peterborough Housing Strategy for 2024-2029. We are generally very supportive and have no major concerns
- The new proposed Strategy encapsulates everything Peterborough expects/should expect from developers and RPs in the area and offers good easy to read guidance for doing so, with specific examples for actionable results
- We like that you have added case studies to support your priorities.
- Anti-social behaviour in city living environments need to be addressed
- The chapter on meeting the needs for accessible and adapted housing may require more detail
- The strategy does not quantify the amount of demand or the availability of supply to address the issues raised under each priority. The Council should be joining with other LAs to get more government resources
- The action plans contained in the strategy have no target dates or measures of success

### Response to Other comments

Support for the Housing Strategy noted and welcomed. Other comments and concerns noted.

The decision was taken to keep the actions set out in the Delivery Plan high level. Our experience has been that detailed action plans included in the housing strategy become outdated over the lifespan of the document.

An annual report will be produced and published on the council's website which sets out progress against delivering each of the priorities; a profile of new risks and opportunities which impact on the council's ability to deliver the housing agenda including any significant national legislation or local policy changes; any new actions arising from the quarterly updates.

### Proposed amendments

The following section sets out the proposed amendments to the draft Housing Strategy. These changes may or may not be being made as result of consultation comments.

Section	Reason for Amendment
Front Cover Title	To remove reference to the draft version of the Housing Strategy
Page 4 Foreword from the Cabinet Member for Housing, Growth and Regeneration	Update to reflect the change in Political administration and remove references to the consultation on the draft strategy
Page 5 Consultation and Engagement	Update to reflect that the public consultation on the strategy has concluded.
Page 7 Setting the Context	To update the reference to the National Planning Policy Framework to reflect that a revised version was published on 20th December 2023.