



PEAKS & PLAINS  
Housing Trust

2020/21  
Environmental, Social,  
Governance (ESG) Report





**PEAKS & PLAINS**  
Housing Trust



**This report is for our customers, funders and partners who want to gain a better understanding of how we plan to tackle the environmental and social challenges we face.**

As a social housing provider we understand the urgent need for more homes that provide people on low incomes with security, decent living conditions and affordability across all tenure types.

At the same time, the country's social housing stock is in urgent need of refurbishment to meet regulatory standards and the government's 2050 net-zero carbon target.

We owe it to our customers, partners and funders to provide a really clear picture of what we are doing to meet these standards and prepare for the future.

This is our first ESG report and it's a useful record of our current situation, but it is just a start. Over time, we'll update it so that each year becomes a developing reflection of how we are managing those challenges, tackling risk and exploring new ventures.

As we develop new understanding, refine our data and develop operational plans we intend to build on the achievements to date and embed continuous improvement in the heart of our business practices.

I hope that this new document can establish a transparent, consistent, and comparable set of ESG criteria for those who need to delve a bit deeper to better understand our social purpose and impact.

**Mark Howden**  
Chief Executive Officer



**Peaks & Plains Housing Trust is a social housing provider operating across Cheshire and the High Peak. We are based in Macclesfield, but we have homes across our patch from Alderley Edge and Poynton to Buxton and Nantwich.**

We own and manage around 5,200 homes, have an annual turnover of £28.4M, employ around 200 staff, and we work in partnership with local and regional organisations to achieve our purpose – to 'help improve lives'.

We do this, primarily, by addressing local housing need, working with communities and providing safe, affordable homes for single people, couples and families.

As a general needs housing provider, we provide a range of services to help us deliver on our strategic priorities, from repairs and estates work to asset management and new developments.

Our focus is on being a great landlord, creating great places to live and being a resilient business.

We are a profit-for-purpose organisation, so any surpluses (profits) that we make are reinvested back into the services that we provide. We don't have owners or shareholders.

Find out more online  [peaksplains.org/about-us](https://peaksplains.org/about-us)



## Summary of criteria themes

Our ESG report is broken into the following themes, and these are further broken down into detailed criteria - C1-C47.

Social	T1 Affordability	How affordable are our homes to those on low incomes? The criteria include the tenure mix of our homes and the security of our tenancies.
	T2 Building safety	How well are we meeting our legal responsibilities to protect residents and to keep their homes safe? The theme is made up of two criteria, disclosing gas safety checks and fire risk assessments.
	T3 Resident voice	How successful are we at listening to and empowering residents? We look at board scrutiny, complaint handling and resident satisfaction.
	T4 Resident support	What do we do to support our residents? Criteria cover what support we offer and how successful it is.
	T5 Placemaking	How successful are we at creating well-designed homes and providing great places to live with a mix of tenure types to support inclusive communities?
	T6 Staff wellbeing	What kind of employer is the Trust and how do we support our people and treat them fairly?
Environmental	T7 Climate change	How are we rising to the challenge of climate change both now and in the future?
	T8 Ecology	How well are we protecting the local environment and ecology? In particular we explore how we source materials, handle waste, manage pollutants, address water management and biodiversity.
Governance	T9 Board & Trustees	How well equipped is our Board to govern the Trust effectively? We look at ownership, experience and independence.
	T10 Systems & risk management	How well does the Trust manage risk and meet all its legal obligations as a social housing provider? This theme includes the Trust's grading and reporting against the Decent Homes Standard.

This document follows the structure of The Sustainability Reporting Standard for Social Housing. In time we aim to adopt the standard and build on this framework.



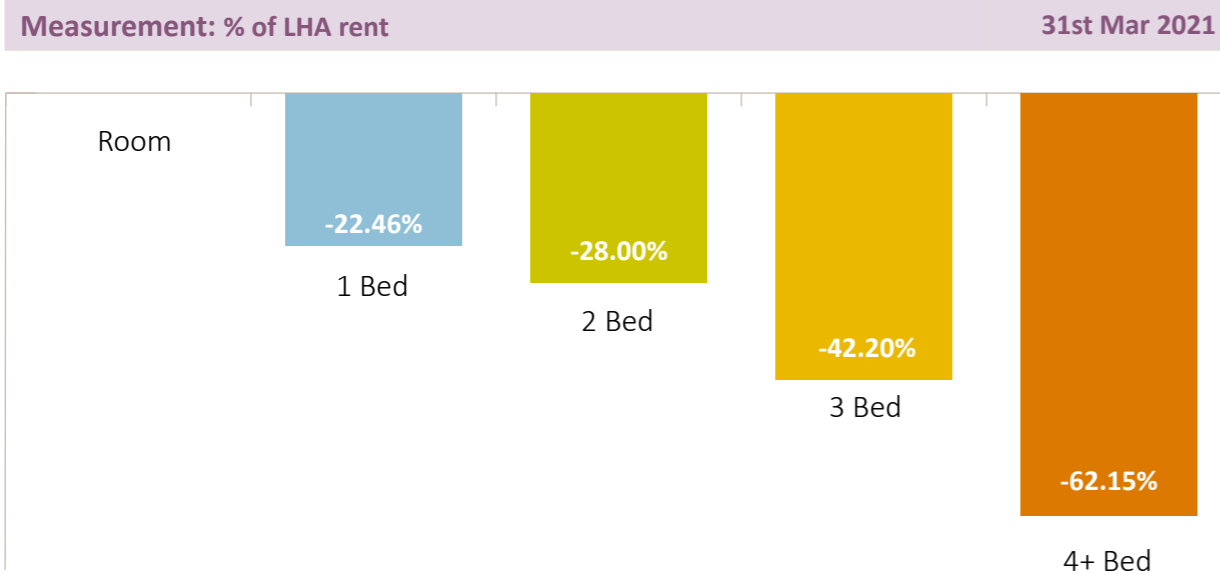
Social...



# Affordability & Security

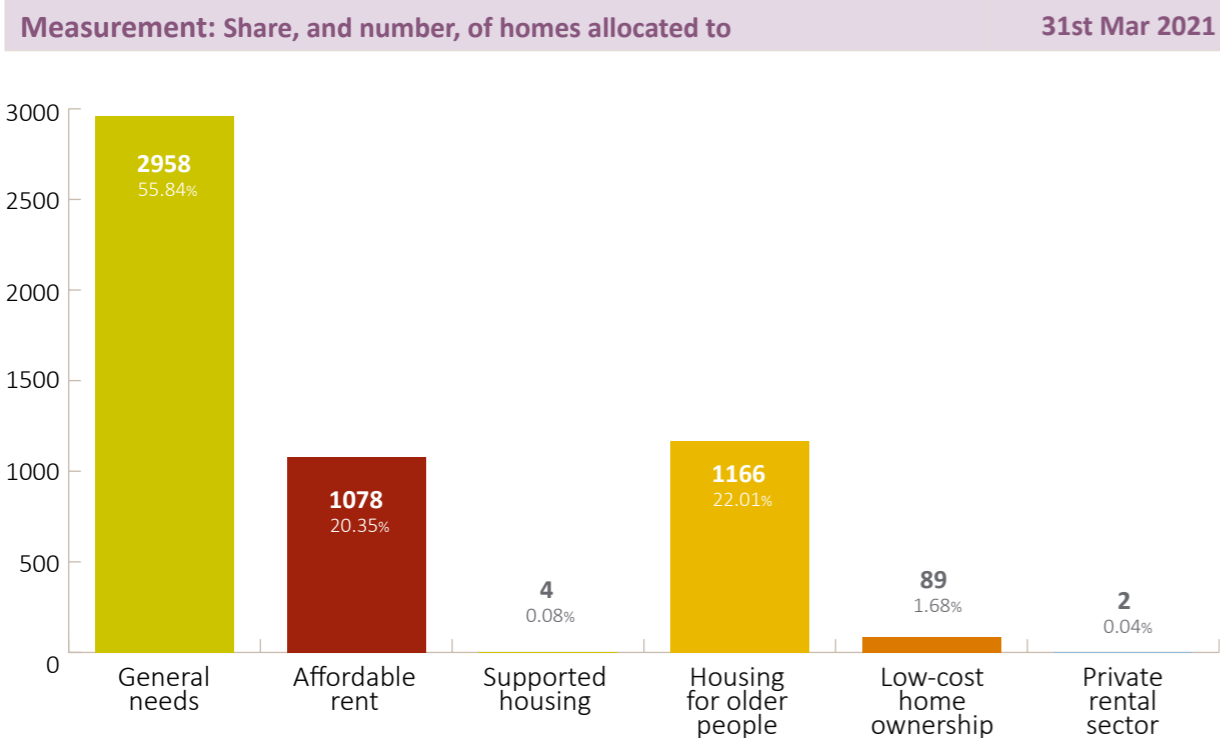
## C1. For properties that are subject to the rent regulation regime, report against one or more Affordability Metric:

Rent compared to Local Housing Allowance (LHA)



Local Housing Allowance (LHA) rates are used to calculate the amount of Housing Benefit (or the housing element of Universal Credit) that can be paid to tenants. It is based on private market rents being paid by tenants in the broad rental market area and is limited by legislation.

## C2. Share, and number, of existing homes (homes completed before the start of the previous financial year) allocated to: General needs (social rent), Intermediate rent, Affordable rent, Supported Housing, Housing for older people, Low-cost home ownership, Care homes, Private Rental Sector:



## C3. Share, and number, of new homes (homes that were completed in the last financial year), allocated to: General needs (social rent), Intermediate rent, Affordable rent, Supported Housing, Housing for older people, Low-cost home ownership, Care homes, Private Rental Sector:

Whilst the Trust were developing some 80 units during 2020/2021 there were no completions in the year.

## C4. How is Peaks & Plains trying to reduce the effect of fuel poverty on its residents?

Fuel poverty is currently measured using the Low Income High Costs (LIHC) indicator. Under the LIHC indicator, a household is considered fuel poor if it has fuel costs that are above average (the national median level) and, if the household was to spend that amount, the residents would be left with a residual income below the official poverty line.

As part of our commitment to reducing fuel poverty the Trust has identified an additional £14m (excluding VAT) which has been included in the business plan in order to achieve this target of properties falling into this category achieving a SAP rating of C by 2030.

## C5. What % of rental homes have a 3 year fixed tenancy agreement (or longer)?

Measurement: % of homes	31st Mar 2021
All Stock	100%
General needs	100%
Affordable rent	100%
Supported & Housing for older people	100%



## Building Safety & Quality

### C6. What % of homes with a gas appliance have an in-date, accredited gas safety check?

Measurement:	31st Mar 2021
% of homes	100%

### C7. What % buildings have an in-date and compliant Fire Risk Assessment?

Measurement:	31st Mar 2021
% of buildings	100%

### C8. What % of homes meet the Decent Homes Standard?

Measurement:	31st Mar 2021
% of homes	99.99%

The Trust ensures that all homes that are due to fail the Decent Homes Standard are included in the investment programme for completion in the year of failure.

The Trust has been working with Savills and Sava to understand the costs of improving homes where the SAP rating is lower than D. We have factored the costs of improving the energy efficiency into the business plan to ensure that all properties achieve a minimum level D by 2028 and C by 2035, prioritising properties where tenants are in fuel poverty to meet level C by 2030.

## Resident Voice

### C9. What arrangements are in place to enable the residents to hold management to account for provision of services?

The Trust has a Customer Voice team that support tenants and residents to influence and scrutinise the work of the Trust. The Customer Voice team work to deliver the Trust's Customer Voice Strategy, approved by Board. This includes a two year action plan to deliver tangible targets for resident involvement. The Trust has an active Challenge Group that meets regularly to scrutinise performance and is developing other geographically based tenant and resident groups. [peaksplains.org/get-involved](https://peaksplains.org/get-involved)

### C10. How does Peaks & Plains measure Resident Satisfaction and how has Resident Satisfaction changed over the last three years?

The Trust tracks resident satisfaction through regular Satisfaction Surveys undertaken and verified by an external organisation. The annual survey is complemented by quarterly surveys of resident satisfaction. The results are used to determine corporate priorities for service review, with teams responding to the survey results with actions as appropriate.

### C11. In the last 12 months, how many complaints have been upheld by the Ombudsman. How have these complaints (or others) resulted in change of practice within the Housing Provider?

The Trust has had two complaints upheld by the Housing Ombudsman in the last 12 months. The Trust has a published Complaints Policy and has also self-assessed itself as "compliant" with the Ombudsman's Complaint Handling Code- we have also published

this self-assessment on our website. Learning from complaints is embedded within the complaints policy, and includes a requirement for managers who uphold complaints to capture learning outcomes. Results are reported to the Trust's Executive.

## Resident Support

### C12. What support services does Peaks & Plains offer to its residents. How successful are these services in improving outcomes?

The Trust has a Vulnerable Persons Strategy and Community Support team. This team provide tenancy sustainment interventions for vulnerable customers. The team have dealt with 355 cases YTD. Their work includes benefit and money advice, support for people with hoarding behaviour and self-neglect. During the Covid lockdown the team made over 200 referrals for food parcels for households without adequate income to buy food.

## Placemaking

### C13. Provide examples or case studies of where Peaks & Plains has been engaged in placemaking or placeshaping activities

The Trust has invested significantly in town-centre living in Macclesfield. As part of this commitment to the town, and Sunderland Street in particular, we play an active role in the Macclesfield Regeneration Group and we work with key stakeholders in that part of town to highlight why Sunderland Street is such a great place to work, live and play.

We have invested in placemaking branding, which we co-created with businesses in that part of town. We also manage an Instagram account that highlights all that Sunderland Street has to offer.

The development of 67 new mixed tenure homes at the Park Green end of the street will only strengthen our stake in this part of town and, we think, tempt others to play a part in the town's promising future.

 [sunderland\\_street\\_macc](https://www.instagram.com/sunderland_street_macc)







## Case Study: Tenancy Support

**One of our tenants, a single mum, was approaching the end of her fixed term tenancy. She was badly behind with her rent (£2,000) and we were considering serving a Section 21 Notice, which would have ended her tenancy.**

When we eventually managed to contact her, she told us that her husband had moved out and left her with four children. She was clearly struggling.

After her husband left, she made a claim to Universal Credit. However, as she has four children, she was heavily affected by the benefit cap, to the tune of £1,100 per month.

We contacted local support services, applied for a Covid grant for her and referred the case to Cheshire East Homeless Prevention Team since there was a real risk of homelessness for this family.

The tenant told us that as she was being so heavily deducted she was using money meant for her rent to pay for other things leaving her with very little to pay her rent.

As a result of our work, the tenant received a Discretionary Housing Payment of £500 and another £500 from the Cheshire East Homeless Prevention Fund.

Due to the customer's situation, we apply for an Alternative Payment Arrangement so that Universal Credit paid the rent directly to the Trust along with a deduction for the remaining arrears.

Aware that this was going to leave the tenant short of money, and knowing that she had a large family, we made sure that we had left her in a sustainable position. We made a referral to a local welfare group who agreed to assist with gas and electric costs plus a weekly food parcel to the family for a period of 3 months so that the arrears could get paid off and her tenancy would be safe.

By working with these groups and partners, this particular tenancy was once more sustainable. She has now totally cleared her arrears and is £200 in credit.



# Environmental...





## Climate Change

### C14. Distribution of EPC ratings of existing homes (those completed before the last financial year)

Measurement: % of homes rated	31st Mar 2021
(92-100) <b>A</b>	0%
(81-91) <b>B</b>	0.29%
(69-80) <b>C</b>	33.07%
(55-68) <b>D</b>	51.65%
(1-54) <b>E+</b>	15%

### C15. Distribution of EPC ratings of new homes (those completed in the last financial year)

Measurement: number of homes rated	31st Mar 2021
(92-100) <b>A</b>	0
(81-91) <b>B</b>	0
(69-80) <b>C</b>	60
(55-68) <b>D</b>	0
(1-54) <b>E+</b>	0

### C16. Scope 1, Scope 2 and Scope 3 green house gas emissions

The Trust has recently approved an Environmental Strategy. A key part of which is to understand how we can reduce our carbon footprint.

In order to do this we aim to understand our current position by April 2022.

### C17. What energy efficiency actions has Peaks & Plains undertaken in the last 12 months?

The Trust has already undertaken work to improve the energy efficiency of its stock. We're tackling this ahead of the introduction of government targets, simple because we think it is the right thing to do.

Despite our approach being more opportunistic than strategic, significant investment has been made including.

- Cladding to Range Court and Pennine Court to improve the energy efficiency
- Cavity wall insulation
- Installation of solar panels to reduce the costs of energy
- Installation of air-source heat pumps

The Trust will continue to work in partnership with Cheshire East to support the delivery of its strategy and to support them to achieve the zero-carbon target by 2050. This will include identifying and accessing funding opportunities, such as the successful bid in 2020 for £270K to move properties from gas to air-source heat pumps. .

### C18. How is Peaks & Plains mitigating the following climate risks: Increased flood risk, Increased risk of homes overheating

We are currently building 67 apartments in Macclesfield, which are split into two blocks on either side of the River Bollin.

The work we have undertaken to manage risk for this scheme reflects our growing awareness of the potential impact of climate change.

As part of the design of the scheme, no living accommodation or communal circulation space is at external ground level. The scheme is constructed from a steel frame, which has allowed the ground floor to be elevated 750mm above ground level, which is higher than the River Bollin level has ever reached since records began.

If the river does flood, the void underneath the ground floors is designed to allow flood water to spread out under the block, and then drain back into the river through specialist drainage which we have installed. All building services are raised up to the upper ground floor level and anything installed in the main entrances at external ground level is outside of the flood zone. In addition, all the walls are tanked with waterproof plaster and all fittings and finishes are non-porous materials.

### C19. Does Peaks & Plains give residents information about correct ventilation, heating, recycling. How this is done?

The Trust has produced a leaflet that provides residents with information about condensation and mould. This is available on our website but is also left by the repairs inspectors when visiting a property that has raised concerns about dampness.

This advice provides simple do's and don'ts to minimising condensation and mould. It advises the customer of the need to properly ventilate and heat the property. This support would benefit new residents and the Trust will look to include this as part of the new tenancy pack, when that is renewed. Also on the website is instructions for boiler maintenance during the winter periods.

The Trust does not provide additional information regarding recycling to those residents that live in our houses, but we are trialling a few recycling projects to blocks to encourage the separation of waste materials and reduce the amount of landfill waste via recycling. Our Customer Contact Centre staff are also qualified to provide information on this.



## Ecology

### **C20. How is the Housing Provider increasing Green Space and promoting Biodiversity on or near homes**

The Trust's Estate Management Policy makes clear our commitment to provide clean, safe and well-maintained green spaces. This policy has been created with consultation from residents. We have well-publicised service standards on the Trust's website, which helps customers to understand how we manage our green estate.

The Trust has commissioned a Land Ownership Project with a planned delivery date of September 2022, which will help us to clarify exactly which pieces of land we own across all the areas where we operate. We'll be using a tool called Land Insight to identify and confirm ownership so we can fully appreciate the spaces we have and to inform who we should work with to enhance our communities.

The Trust will also develop Neighbourhood Plans, which will give potential for biodiversity such as wildflower meadows or communal garden sites. The Trust's Scrutiny Panel - a group of involved tenants – has been asked to review our current grounds maintenance service and to broaden our understanding of the kinds of green spaces that our customers would prefer.

We run an annual gardening competition for residents. This event, which is sponsored by a contractor, recently attracted well over 50 entries. This initiative, and others like it, encourage tenants to share the pride they have in their green spaces and to engage with our work.

### **C21. Does the Housing Provider have a strategy to actively manage and reduce all pollutants?**

As part of the Environmental Strategy Delivery Plan the Trust will develop a plan for managing and mitigating the risk caused by air pollution. We will work with specialist consultants to determine where the Trust can reduce the pollutants generated by business activities, for example driving and through its properties, such as the heating types.



## Resource Management

### **C22. Does the Housing Provider have a strategy to use or increase the use of responsibly sourced materials for all building works?**

The Trust do not target or measure performance in this area to date but ensure that significant partners are working towards or source only traceable materials. Jewson's the main supplier of materials to the Trust adheres to this principle.

The Trust is currently reviewing their development preambles and specification for future works, and this will be included as part of the contractual documentation.

### **C23. Does the Housing Provider have a strategy for waste management incorporating building materials?**

As part of our commitments in the Environmental Strategy March 2022, the Trust is investigating the procurement of a waste management organisation that will co-ordinate waste removal.

These organisations specialise in providing a strategy for implementing a smarter approach to waste management and can provide data on how waste is disposed of (e.g., recycling, heat source or landfill).

In addition, the Trust has engaged with our material supplier to manage the spare materials left over from repair work. These 'extras' are now logged as an additional resource and, when new materials are ordered, the additional resource is prioritised to ensure we keep waste to a minimum.

The Trust Development Team also has waste management KPIs within their contractual obligations which are collated monthly.

### **C24. Does the Housing Provider have a strategy for good water management?**

The Trust is currently developing its approach to water management as part of the recently approved Environmental Strategy. This will include identifying ways of reducing the amount of water we use and offering opportunities for tenants to do the same. As part of the approach the Trust will also contact the water authority to ensure we are working collaboratively and that opportunities to minimise water usage are identified.





# Governance...

## Structure and governance

- C25. Is Peaks & Plains registered with a regulator of social housing?** Yes
- C26. What is the most recent viability and governance regulatory grading?**  
In September 2021 the regulator upgraded the Trust to a G2 rating and confirmed it V1 status.
- C27. Which Code of Governance does Peaks & Plains follow, if any?**  
We currently follow the National Housing Federation’s 2015 Code, following a GAP analysis the Board decided it was not yet in a position to adopt the 2020 Code, however an action plan has been put in place in order to address those gaps.
- C28. Is Peaks & Plains Not-For-Profit?** Yes
- C29. Explain how Peaks & Plains’ board manages organisational risks?**  
The board employs a risk management framework , which includes policy, risk appetite, a risk register (strategic & operational) and an assurance plan. Detailed scrutiny of risk is delegated to the Audit Committee and the board sees- and is invited to comment on- our strategic risk register at every meeting.  
In 2020-21 the Audit Committee received “substantial assurance” around the Risk Management Framework from our external auditors.
- C30. Has Peaks & Plains been subject to any adverse regulatory findings in the last 12 months (e.g. data protection breaches, bribery, money laundering, HSE breaches or notices) – that resulted in enforcement or other equivalent action?**  
Yes. We had a Regulatory Judgement, published in March 2020; a downgrade (from G1 to G3). In September 2021 the regulator upgraded the Trust to a G2 rating and confirmed it V1 status.



## Board and Trustees

### C31. What are the demographics of the board? And how does this compare to the demographics of Peaks & Plains' residents, and the area that they operate in?

There is currently a fairly even gender split across the Board (4 women, 5 men September 2021). We recently embarked on a recruitment drive for new board members and began to explore the ways that we could embed equality and diversity in this process – and across the Trust more widely. For example, we worked with the Housing Diversity Network to widen our recruitment reach.

In order to know if our Board is truly representative, however, we need more accurate data about the individuals who live in our homes. To that end, we embarked on our Customer Data Project back in September 2020.

This project involved staff across the Trust, communicating with every one of our customers to check and validate their data so we can communicate and deliver better services to them.

The project has involved a postal campaign, thousands of phone calls and will also require in-person house visits to make sure that our data is as accurate and complete as it can be.

We will present our findings to the Board in December 2021 along with our plans for how we'll use the information and retain data integrity into the future.

### C32. What % of the board AND management team have turned over in the last two years?

Following the self-referral to the RSH, there was a full refresh of the Executive Management Team, the current team has been in place since March 2020. In addition following a skills review undertaken by an external consultant there was a refresh at Board level too. Three Board members were replaced (33.3%) and the Board and Audit Committee were further strengthened by the addition of co-optees. Further changes are now due as a result of 3 board members coming to the end of their term.

### C33. Is there a maximum tenure for a board member? If so, what is it?

Yes, our rules set out a maximum term of nine years (unless it is considered in the best interests of Trust to adjust this). However, the board has agreed to limit terms of service to 2 x 3 year terms with extension by exception of up to 3 additional single years.

C34. What % of the board are non-executive directors? 100%

C35. Number of board members on the Audit Committee with recent and relevant financial experience: 3

C36. Are there any current executives on the Remuneration Committee? No

### C37. Has a succession plan been provided to the board in the last 12 months?

We reported on appointments and due retirements to our board in March 2021. Succession planning was covered in a Board skills report, which went to the Board in May 2021, which included plans to recruit.

### C38. For how many years has Peaks & Plains' current external audit partner been responsible for auditing the accounts?

We are in our first year of the current provider after re-tendering for 2020/2021.

### C39. When was the last independently-run, board effectiveness review?

The Board effectiveness was reviewed in November 2019 by DTP, due to the significant changes in the Board a further review was undertaken by Altair in May 2021 and reported to Board in July.

C40. Are the roles of the chair of the board and CEO held by two different people? Yes

### C41. How does Peaks & Plains handle conflicts of interest at the board?

- Annual declarations of interest for Board & Committee members.
- Declarations of interest item on each Board & Committee Agenda - where appropriate, member may not take part in decision-making or may leave the meeting for a particular item.
- Our Code of Conduct - for all Committee, Service and Board members - covers conduct regarding declarations and conflicts of interest. The Trust's rules also specify how conflicts should be handled.

## Staff Wellbeing

### C42. Does Peaks & Plains pay the Real Living Wage?

With the exception of our apprentices, all staff are paid at or above the Real Living Wage.

### C43. What is the gender pay gap?

-2.9%. We publish our Gender Pay Gap annually on our website. It's part of our commitment to Equality and Diversity. (Due to our size- fewer than 250 staff- this is not required under the GPG reporting rules.)

### C44. What is the CEO-worker pay ratio?

Our Chief Executive to staff ratio is 4.85.





#### **C45. How does Peaks & Plains support the physical and mental health of their staff?**

The Trust provides an ongoing program of wellbeing for its staff by offering the Westfield Health suite of benefits, including a counselling service and 24/7 medical advice.

We train staff to be Mental Health First Aiders and we provide stress management training to managers and awareness to staff.

Post Covid, we will return to offering health MOTs. We also provide staff with an annual flu vaccine. From a H&S perspective the Trust provides all relevant PPE to ensure staff carry out their job roles safely. This includes prescription safety goggles, hand vibration assessments, Hep A&B vaccines and lone worker alarms.

The Trust also works with an Occupational Health provider to support staff who are off on long-term sick or any staff member that is struggling with an element of their job role where we may need to make reasonable adjustments.

#### **C46. Average number of sickdays taken per employee?**

6.25 days

## Supply Chain

#### **C47. How is Social Value creation considered when procuring goods and services?**

We are developing a Social Value Strategy that will undoubtedly positively impact our procurement processes and activities.

#### **C48. How is environmental impact considered when procuring goods and services?**

As part of the Trusts Environmental Strategy, we will be implementing changes to our procurement procedures to ensure that all suppliers and contractors are able to demonstrate that they have acceptable environmental or waste management policies in place.

Furthermore, the Trust is developing a Social Value Strategy that will support the integration of key environmental considerations within its procurement activities over the next 3 years.



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