



Public Document Pack

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05 July 2022

ENVIRONMENT COMMITTEE

A meeting of the Environment Committee will be held in **Council Chamber, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF** on **Thursday 14 July 2022 at 6.00 pm** and you are requested to attend.

Members: Councillors Edwards (Chair), Chace (Vice-Chair), Bicknell, English, Goodheart, Huntley, Needs, Pendleton, Thurston, Warr and Worne

PLEASE NOTE:

1. Where a member of the public wishes to attend the meeting or has registered a request to take part in Public Question Time, they will be invited to submit the question in advance of the meeting to be read out by an Officer, but of course can attend the meeting in person. There will be limited public access to this meeting and admission for public speakers will be by ticket only, bookable when submitting questions. Attendees will be asked to sit in an allocated seat in the public gallery on a first come first served basis. Only one ticket will be available per person.
2. It is *recommended* that all those attending take a lateral flow test prior to the meeting.
3. Those attending the meeting will *not* be required to wear a face covering however, are encouraged to bring one along to cover instances where a meeting may have higher public attendance. Masks will be made available at the meeting.
4. We request members of the public do not attend any face to face meeting if they have Covid-19 symptoms.

Any members of the public wishing to address the Committee meeting during Public Question Time, will need to email Committees@arun.gov.uk by 5.15 pm on Wednesday 06 July 2022 in line with current Committee Meeting Procedure Rules.

It will be at the Chief Executive's/Chair's discretion if any questions received after this deadline are considered.

For further information on the items to be discussed, please contact Committees@arun.gov.uk.

AGENDA

1. APOLOGIES

2. DECLARATIONS OF INTEREST

Members and Officers are invited to make any declaration of pecuniary, personal and/or prejudicial interests that they may have in relation to items on this agenda, and are reminded that they should re-declare their interest before consideration of the items or as soon as the interest becomes apparent.

Members and Officers should make their declaration by stating:

- a) the item they have the interest in
- b) whether it is a pecuniary/personal interest and/or prejudicial interest
- c) the nature of the interest

3. MINUTES

(Pages 1 - 6)

The Committee will be asked to approve as a correct record the Minutes of the Environment Committee held on 19 May 2022.

4. ITEMS NOT ON THE AGENDA THAT THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

5. PUBLIC QUESTION TIME

To receive questions from the public (for a period of up to 15 minutes)

OUTSIDE BODIES - FEEDBACK FROM MEETINGS

6. EXIT STRATEGY FOR WITHDRAWAL OF THE 1-2-3 FOOD WASTE & ABSORBENT HYGIENE PRODUCTS (AHP) COLLECTIONS

(Pages 7 - 10)

The Environment Committee resolved on 19th May 2022 to retain, for the time being, a weekly residual service from black sacks until such time that the Government mandates food waste collections to all households. In view of this West Sussex County Council (WSSCC) through the Joint Project Board, questioned the added value of continuing the 1-2-3 collections in the trial area. WSSCC concluded that continuing

the collections in the trial area would not represent the best use of their Recycling Improvement Fund. This report proposes an exit strategy for early closure of the 1-2-3 collection scheme.

[20 Minutes]

7. OPTIONS FOR INTRODUCING FURTHER CONTROLS ON THE QUALITY OF HOUSES IN MULTIPLE OCCUPATION (Pages 11 - 94)

At the Housing and Customer Services Working Group meeting on 5 November 2020 Members recommended to Cabinet to continue to research and gather further evidence to help establish whether additional House in Multiple Occupation (HMO) licensing or selective licensing of the private rented sector was justified.

This decision was approved by Cabinet on 14 December 2020 and officers instigated the process of procuring the services of a company to undertake the required additional research and provision of a supporting report.

This report provides a summary of the findings from the research undertaken and sets out recommendations for additional controls that could be implemented to manage the quality of houses in multiple occupation.

[20 Minutes]

8. POTENTIAL INCREASE IN THE NUMBER OF DESIGNATED BATHING WATERS IN ARUN DISTRICT (Pages 95 - 102)

The report seeks authority to undertake the necessary investigation and survey work and then if appropriate to make representation to the Department for Environment Food and Rural Affairs to increase the number of designated Bathing Waters in Arun District.

[10 Minutes]

9. KEYSTONE YOUTH CENTRE UPDATE (Pages 103 - 116)

The Keystone Centre is a long-established centre for a range of youth provision services situated in the deprived ward of Wick Littlehampton. Approval was provided by the Arun District Council (ADC) Cabinet in November 2018 to provide funding and make land available via a lease to Littlehampton Town Council to replace the existing run-down facility at an adjacent area of land. Improvements also include the outdoor facilities that will accompany the new community building.

This report provides an update, next steps, and program for the delivery of these facilities.

[20 Minutes]

10. BOGNOR REGIS BEACH ACCESS WORKING PARTY - 06 JULY 2022

The Chair of the Bognor Regis Beach Access Working Party, Councillor Worne, will provide a brief update of the meeting held on 06 July 2022.

11. WORK PROGRAMME

(Pages 117 -
118)

The Committee is required to note the Work Programme for 2022/23.

Note : If Members have any detailed questions, they are reminded that they need to inform the Chair and relevant Director in advance of the meeting.

Note : Filming, Photography and Recording at Council Meetings – The District Council supports the principles of openness and transparency in its decision making and permits filming, recording and the taking of photographs at its meetings that are open to the public. This meeting may therefore be recorded, filmed or broadcast by video or audio, by third parties. Arrangements for these activities should operate in accordance with guidelines agreed by the Council and as available via the following link [Filming Policy](#)

Public Document Pack Agenda Item 3

Subject to approval at the next Environment Committee meeting

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ENVIRONMENT COMMITTEE

19 May 2022 at 6.00 pm

Present: Councillors Edwards (Chair), Chace (Vice-Chair), Bicknell, English, Goodheart, Huntley, Needs, Pendleton, Thurston, Warr and Worne

Councillors Cooper (Andy), Cooper (Alison), Gunner and Walsh were also in attendance for all or part of the meeting.

17. WELCOME

After welcoming Members, Officers and guests to the meeting, the Chair then welcomed Councillor Pendleton as a new Member of the Environment Committee. He also recorded thanks to Councillor Staniforth for her work as Vice-Chair of the Committee over the past year.

18. DECLARATIONS OF INTEREST

Councillor Walsh declared a Personal Interest in Agenda Item 7 as a Member of West Sussex County Council.

Councillor Goodheart declared a Personal Interest in Agenda Item 8 as a Member of Bognor Regis Town Council.

Councillor Pendleton declared a Personal Interest in Agenda Item 7 as a Member of West Sussex County Council

19. MINUTES

The Minutes of the meeting held on 10 March 2022 were approved by the Committee. These would be signed at the end of the meeting.

20. ITEMS NOT ON THE AGENDA THAT THE CHAIRMAN OF THE MEETING IS OF THE OPINION SHOULD BE CONSIDERED AS A MATTER OF URGENCY BY REASON OF SPECIAL CIRCUMSTANCES

The Chair confirmed that there were no urgent matters for this meeting.

21. PUBLIC QUESTION TIME

The Chair confirmed four questions had been submitted, which are briefly summarised below:

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- 1-4 From Freddie Tandy to the Chair of the Environment Committee, Councillor Edwards, regarding parking at the Littlehampton Wave Leisure Centre/Mewsbrook Car Park.

(A schedule of the full question asked and the response provided can be found on the [Environment Committee Public Question Web page](#))

The Chair then drew Public Question Time to a close.

22. START TIMES

The Committee

RESOLVED

That its start times for meetings for 2022/23 be 6.00pm.

23. COMBINED CLEANSING SERVICES CONTRACT

Upon the invitation of the Chair, the Environmental Services & Strategy Manager presented the report to the Committee. He explained the Committee had two choices, one being the recommendation which would bring a change to current services, the other option was to continue with current services for the time being. The recommendation was a move to alternate weekly collections for residual waste, with a bin provided to residents from the council, alongside a commitment to introducing food waste collections at the earliest opportunity when funding was available from the Government. Officers believed this was the right approach which was supported by partners at West Sussex County Council and through the work that Ricardo had undertaken on the council's behalf. The recommendations sought to build on the success of the council's recent 1-2-3 food waste trial, and the anticipated direction of the Government Resource & Waste Strategy. A weekly residual collection was around £358,000 more expensive compared to an alternate weekly residual collection. The recommendations were based on alignment with the council's adopted Vision; including a stated recycling target of 55% by 2025 and to 'ensure climate change and sustainability is at the heart of all council services'. He highlighted there were around 6000 properties within the District where moving to a fortnightly residual waste collection would be difficult, and the report proposed to keep these properties on a weekly collection until further proposals could be considered regarding how the transition for those properties could be made.

The Environmental Services & Strategy Manager explained that if the Committee decided to retain the existing services, the council would need to move to alternate weekly collection when the Government introduced mandatory food waste collection. This was because there would be no viability or argument for a weekly residual service in addition to weekly food waste collection, which would be impractical and costly to deliver.

The Chair then invited Sam Pullinger, Category & Commercial Procurement lead for External Partners, Hampshire County Council to address the Committee, who gave a summary of the procurement process and options.

The Chair then invited Steve Read, Director for Environment & Public Protection West Sussex County Council, to address the Committee. He believed that the success of the food waste trial showed that Arun had potential to be one of the UK's top performing authorities in recycling if they chose the right option for waste collection. He explained modelling and predictions showed moving to alternate weekly collection over the next 3 years would increase recycling levels, and reduce waste disposal significantly. This would be more significant upon the introduction of food waste collection.

The Chair then invited John Woodruff, Ricardo Consulting, to address the Committee. He explained that the Extended Producer Responsibility (EPR) funding would be in place from April 2024. This would be a contribution from producers to councils for recycling and waste collections. The process for allocating funding had not yet been finalised, but levels of contribution would be based on efficiency of scheme, recycling performance and material quality. Food waste collection would be compulsory from 01 April 2023, and specific costs for introducing food waste collection would be funded by New Burden Funding. However there was uncertainty around this which represented risk, and therefore price increases. When the final date was to be announced by DEFRA, there would be a bottleneck due to a surge in demand, there may not be enough vehicles and containers. The sooner a decision was made, the better chance of getting what Arun wanted, and if left longer the prices would increase.

The Chair thanked Sam Pullinger, Steve Read and John Woodruff for their contributions. He recognised that the recommendations supported alignment with the Vision of the council, and would support residents to do the right thing. He proposed an amended version of the recommendation, which was seconded by Councillor Chace. This was as follows:

That subject to Policy & Finance/Full Council confirmation of the finance available, the Environment Committee approve:

1. The award of a three-year contract extension with modifications from the 1st February 2023 at an initial annual cost of £6.749 million (an additional annual cost of £655k on the current £4.918 million subject to indexation); To consist of service configuration 'A' which represents an 'as is' service comprising a weekly residual collection from sacks. The award will include a provisional annual sum of £1.176

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million (plus indexation) for food waste should it be mandated to be rolled out within the life of the extension.

2. To authorise the Director of Services to sign off a Deed of Modification to incorporate the service changes agreed at 1 above.
3. To approve that if food waste collection is mandated to be rolled out by government within the three year extension that the Council must switch to an alternate weekly collection service for residual collections at the point of roll out. And that on this basis that authority be delegated to the Director of Services to procure the 240 litre residual waste bins required to deliver services, for a one-off capital sum of £1.32million (subject to inflation) and a further capital sum of £300k (subject to inflation) for indoor/outdoor food caddies, utilising an existing framework(s) for such procurement and to be completed in consultation with the Council's procurement advisors.

The Committee then took part in a full debate, summarised below, during which time some non-Committee Members were also given permission to speak by the Committee.

Questions were asked on how the alternate weekly collection would be rolled out once the food waste collection was introduced, and whether there could be an overlap. The Chair said that although the detail would not be decided yet, this would be noted, and that residents would need to be well informed prior to roll-out.

Houses of Multiple Occupation (HMOs) were discussed and it was asked whether the timescales for rolling out food waste collection had been decided. The Environmental Services & Strategy Manager explained that as per the report, HMOs would be audited on an individual basis.

It was asked whether Absorbent Hygiene Products (AHPs) collection service could be provided, as this was a major contribution of waste. The Environmental Services & Strategy Manager explained that this had been trialled as part of the 1-2-3 Food Waste Trial, however it was a very costly option and not considered necessary in a 1-2-2 collection. This was something that could be considered moving forward.

There was disappointment expressed that the recommendations in the Officer's reports were being altered. There was no reason to delay and it was felt the amended proposal would be a backward step, that there should be alternate weekly collections now with food waste collections being brought in as soon as possible. Many councils were already running an alternate weekly waste collection.

There was concern that if Arun funded food waste collection now, they may not be eligible for government funding when it became mandatory, so funding it themselves now would be a big risk.

It was important that preparations were made now to ensure Arun were ready to roll-out in a years time. It was suggested that the bins and food caddies should be ordered now, and not paid for until funding was secured. It was felt there should not be two changes to collections in a short space of time, and weekly waste collection should continue until a 1-2-3 collection could be properly rolled out. Residents should be educated in order to reduce food waste.

It was asked whether multi-functional split vehicles would be an option. The Environmental Services & Strategy Manager explained that these vehicles were very expensive, and although successfully used by some councils, were not an efficient option for Arun at this time.

A recorded vote was requested. Those voting for were Councillors Bicknell, Chace, Edwards, English, Goodheart, Huntley, Needs, Pendleton and Warr. Councillor Thurston voted against. Councillor Worne abstained from voting. The vote was therefore declared carried.

The Committee

RESOLVED

That subject to Policy & Finance/Full Council confirmation of the finance available, the Environment Committee approve that:

1. The award of a three-year contract extension with modifications from the 1st February 2023 at an initial annual cost of £6.749 million (an additional annual cost of £655k on the current £4.918 million subject to indexation); To consist of service configuration 'A' which represents an 'as is' service comprising a weekly residual collection from sacks. The award will include a provisional annual sum of £1.176 million (plus indexation) for food waste should it be mandated to be rolled out within the life of the extension.
2. To authorise the Director of Services to sign off a Deed of Modification to incorporate the service changes agreed at 1 above.
3. If food waste collection is mandated to be rolled out by government within the three year extension that the Council must switch to an alternate weekly collection service for residual collections at the point of roll out. And that on this basis that authority be delegated to the Director of Services to procure the 240 litre residual waste bins required to deliver services, for a one-off capital sum of £1.32million (subject to inflation) and a further capital sum of £300k (subject to inflation) for indoor/outdoor food caddies, utilising an existing framework(s) for such procurement and to be completed in consultation with the Council's procurement advisors.

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24. BOGNOR REGIS BEACH ACCESS WORKING PARTY - 09 MAY 2022

[Councillor Needs declared a Personal Interest at the start of this Item as a Member of Bognor Regis Town Council]

The Chair of the Bognor Regis Beach Access Working Party gave a brief update to the Committee and presented the Minutes of the first meeting of the Working Party, which contained a recommendation at Minute 4.

The recommendation was proposed by Councillor Worne and seconded by Councillor Edwards

The Committee

RESOLVED

That 1a) of the Terms of Reference of the Bognor Regis Beach Access Working Party be changed to 'to consider the issues surrounding the provision of an access to the beach for all in Bognor Regis and to examine the options available for such an access'

25. WORK PROGRAMME

Upon the invitation of the Chair, the Group Head of Neighbourhood Services introduced the Work Programme.

It was requested that an interim report regarding HMO waste collections be brought to the October Committee meeting, and a final report brought in January 2023. Other Members expressed a wish for this to be added to the Work Programme and the Director of Services gave her assurance that this request would be looked at as a priority alongside the implementation of the new contract, and what the Government mandated regarding waste collection.

It was requested that an update on the tree planting strategy be brought to the Committee in Autumn. The Group Head of Neighbourhood Services confirmed this would be added to the Work Programme.

The Work Programme was noted.

(The meeting concluded at 7.43 pm)

ARUN DISTRICT COUNCIL

REPORT TO ENVIRONMENT COMMITTEE ON 14th July 2022

SUBJECT: Exit Strategy for withdrawal of the 1-2-3 Food Waste & Absorbent Hygiene Products (AHP) Collections

REPORT AUTHOR: Oliver Handson, Environmental Services & Strategy Manager

DATE: July 2022

EXTN: 01903 737955

AREA: Services Directorate, Neighbourhoods Group

EXECUTIVE SUMMARY:

The Environment Committee resolved on 19th May 2022 to retain, for the time being, a weekly residual service from black sacks until such time that the Government mandates food waste collections to all households. In view of this West Sussex County Council (WSSCC) through the Joint Project Board, questioned the added value of continuing the 1-2-3 collections in the trial area. WSSCC concluded that continuing the collections in the trial area would not represent the best use of their Recycling Improvement Fund. This report proposes an exit strategy for early closure of the 1-2-3 collection scheme.

RECOMMENDATIONS:

It is recommended that the Committee approve:

1. The withdrawal of the 1-2-3 collections to residents from the end of September 2022
2. To fund the remaining collection costs until this point from existing Neighbourhoods Group budgets

1.0 BACKGROUND

- 1.1 On the 20th January 2022 a report on the positive progress and achievements of the 1-2-3 collections trial was presented to the Environment Committee. The Committee endorsed the continuation of the 1-2-3 collections beyond the initial 12 months trial (May 2022) until the end of January 2023 and the start of the Council's new Combined Cleansing Services Contract (CCSC).
- 1.2 The trial which ended on the 18th May 2022 resulted in significant diversion of food waste from the residual stream alongside high resident engagement and satisfaction, full details of which were presented to Members at the January Committee. In summary the trial had realised a drop in residual waste by more than half, an increase in recycling rates and residents had welcomed the collection scheme, with over 85% participation rate throughout the trial period.
- 1.3 The final survey of over 180 residents, completed in April 2022, highlighted the following which largely mirrored the positive results at the 6 month survey stage:
- 90% were "very satisfied" or "fairly satisfied" with the food waste collection service
 - 94% were "very satisfied" or "fairly satisfied" with the recycling service
 - 73% were "very satisfied" or "fairly satisfied" with the general waste
 - 76% found the general waste bin to be large enough
 - 95% of respondents have been using the food waste bin
- 1.4 Funding for the trial was provided by West Sussex County Council as part of an improvement fund available to all District & Borough Councils within West Sussex as part of the West Sussex Waste partnership. West Sussex County Council were prepared to fund continuation of the 1-2-3 Collections following endorsement by the Environment Committee for its continuation until the end of January 2023,
- 1.5 On the 19th of May 2022, a further report was presented to the Environment Committee concerning options for the delivery of the Councils CCSC from the 1st of February 2023, in which the officer recommendation was to move to a fortnightly refuse collection service from this date with phasing in of food waste collections. The Committee's decision was to maintain a weekly refuse collection from sacks until such time as the Council were mandated to bring in a universal food waste collection service.
- 1.6 Following this decision to retain a weekly refuse collection as part of the CCSC, WSCC raised the question with the Project Board as to whether continuing the 1-2-3 collections in the trial area beyond June 2022 would provide any added value. The data and learnings from the trial have provided sufficient evidence to support a 1-2-3 collection system, which was intended to influence decisions on a collection methodology which included food waste collection and reduced frequency for residual collections district wide. Having discussed this with the Project Board, WSCC felt that having proved the concept, continuing the collections in the trial area would not represent the best use of the Improvement Fund which could be directed at other projects.
- 1.7 To ensure the withdrawal requirements and communication to residents of this decision can be planned accordingly, it is recommended that officers work on an exit strategy including communications plan based on the withdrawal of the service from the end of September this year.

1.8 Whilst it may be disappointing to the high number of residents that were fully engaged with the 1-2-3 collections that it will be withdrawn, over twelve months of data has been gathered throughout the course of the trial, alongside significant learning in how to roll out changes to refuse collections and introduce a weekly food waste collection element.

2. PROPOSAL(S)
For Members of the Environment Committee to agree the recommendation outlined in the report

3. OPTIONS:
a) To fund the 1-2-3 Collections until the end of January 2023 requiring a supplementary estimate of £35k

4. CONSULTATION:

Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		✓
Relevant District Ward Councillors		✓
Other groups/persons (please specify)		

5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)

	YES	NO
Financial	✓	
Legal		✓
Human Rights/Equality Impact Assessment		✓
Community Safety including Section 17 of Crime & Disorder Act		✓
Sustainability		✓
Asset Management/Property/Land		✓
Technology		✓
Other (please explain)		✓

6. IMPLICATIONS:

6.1 WSCC will continue to cover the costs for AHP and Food waste recycling/disposal during the winding down period. There is a cost of approx. £11,919 to run the trial from the beginning of July until the end of September which incorporates the costs of food waste and AHP collections until this point. It is recommended that this cost be borne from existing budgets within the Neighbourhoods Group. A virement will be made transferring the required funding from other budgets to this budget during 2022/23.

The cost to operate the 1-2-3 collections until the end of January 2023 which incorporates the costs of food waste and AHP collections until this point is approx. £35k.

7. REASON FOR THE DECISION:

To ensure a planned withdrawal of the 1-2-3 collections and effective resident communications regarding this withdrawal

8. BACKGROUND PAPERS:

Environment Committee minutes:

[20th January 2022](#)

[19th May 2022](#)

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF ENVIRONMENT COMMITTEE ON 14 JULY 2022

SUBJECT: Options for introducing further controls on the quality of Houses in Multiple Occupation

REPORT AUTHOR: Louise Crane Principal Environmental Health Officer
DATE: 27 April 2022
EXTN: 01903 737669
AREA: PLACE

EXECUTIVE SUMMARY:

At the Housing and Customer Services Working Group meeting on 5 November 2020 Members recommended to Cabinet to continue to research and gather further evidence to help establish whether additional House in Multiple Occupation (HMO) licensing or selective licensing of the private rented sector was justified.

This decision was approved by Cabinet on 14 December 2020 and officers instigated the process of procuring the services of a company to undertake the required additional research and provision of a supporting report.

This report provides a summary of the findings from the research undertaken and sets out recommendations for additional controls that could be implemented to manage the quality of houses in multiple occupation.

RECOMMENDATIONS:

That Committee:

1. Agree to instigating the consultation process subject to funding being approved for a proposed additional licensing scheme for houses in multiple occupation for the wards Marine, Hotham and River, to cover privately rented properties occupied by three or four people making up two or more households and properties converted into self-contained flats that meet the definition of Section 257 HMOs at a cost of £40,000.
2. Recommend a supplementary estimate of up to £40,000 to Policy and Finance Committee and Full Council for additional resources to support the consultation process required to implement the additional licensing scheme for houses in multiple occupation. This is a Band D Council Tax equivalent of 63p.

1. BACKGROUND:

1.1 Mandatory licensing of HMOs came into force in 2006 and originally applied to properties of three storeys or more with five or more people making up two or more

separate households living in them. Landlords of these properties are required to apply to the council for a licence, pay a locally set fee to cover the cost of administering the regime and the property must meet minimum standards which include, room sizes, provision of amenities (bathroom and kitchens), gas, electrical and fire safety for example and the landlord must be a fit and proper to hold the licence.

- 1.2 Upon receipt of a complete application an inspection will be carried out to ensure the required minimum standards are being met. Where works are identified these will be included as part of the conditions of the licence and the landlord will be given timescales for their completion. The council determines if a landlord is fit and proper by means of self certification on the application form and the proposed licence holder declares that they have no unspent convictions or have any civil or criminal judgements against them in relation to housing, tenancy or public health related matters.
- 1.3 Before issuing a license, the local authority must legally send a draft copy of the licence to all interested parties for example, owner, leaseholder, mortgage company, agent etc providing a consultation period of 14 days and any representations must be considered by the council. After this period the licence can be issued and any conditions will be monitored to ensure they are completed and fulfilled, therefore follow up inspections will be carried out by officers. Licences are issued for a maximum period of 5 years, if the property meets all the required minimum standards then a further inspection will not be undertaken until renewal of the licence, unless a complaint is received that requires investigation. Under this scheme the council had 90 licensed HMOs.
- 1.4 With the rise in house prices many people are unable to afford their own home and therefore there has been an increase in the private rented sector over the last decade which in turn has seen an expansion of the HMO market and in it is now not uncommon for flats, and single and two storey houses, originally designed for families to be let as HMOs. Many are managed to a good standard by reputable landlords, but unfortunately this is not always the case. The government therefore introduced The Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 on 1st October 2018 which removed the storey requirement as part of the definition for those properties required to be licensed under the mandatory scheme
- 1.5 The aim was to remove the uncertainty particularly in high risk, intensely occupied HMOs, by creating a level playing field between landlords so rogue landlords cease to be able to operate substandard accommodation for maximum profit. This resulted in any property with five or more people making up two or more separate households requiring a licence. Officers believe that under the new definition there are approximately 300 licensable HMOs within the district, i.e. that an additional 200 HMOs fall within the licensing regime due to this change. This figure has been supported by the recent private sector housing stock modelling undertaken by the Building Research Establishment (BRE). The Council currently has 206 licences either granted or in progress. It is therefore expected that there are still a significant number of HMOs which remain unlicensed and it will require proactive action and potentially enforcement by officers to ensure these properties have the required licence.
- 1.6 HMO licensing is the only proactive private sector housing standards compliance work undertaken by the Private Sector Housing and Public Health Team. The

regulation of the sector is restricted to investigating complaints received by the Council and officers working in a reactive way, rather than a planned and managed format. Enforcement is through the Housing Health and Safety Rating System (HHSRS). This is complex and designed for individual properties rather than area wide action and it can be time consuming.

- 1.7 One of the failings of this approach is that it must be acknowledged that many tenants, particularly the more economically disadvantaged and vulnerable will perceive a risk in complaining about the condition of their home and may be deterred from complaining due to the fear of retaliatory eviction. There is therefore likely to be under-reporting of deficiencies in the quality of private rented sector housing. Introducing licensing has the effect that it is the responsibility of the landlord or freeholder to apply to be licensed and make any required improvements to their properties.
- 1.8 The Housing Act 2004 gives Local Authorities the power to introduce additional licensing schemes for HMOs or selective licensing schemes for the private rented sector to assist with additional controls to tackle specific issues that may be prevalent in certain wards or the entire district. The following sections explain the two schemes in more detail.
- 1.9 At the meeting of Full Council on 25 February 2020 a motion was received from the Liberal Democrat Group in accordance with Council procedure 14.1 and 14.2 which stated: -

“The Council is asked to support a request for officers to explore what options might exist for introducing further controls on the definition, number and quality of homes in Multiple Occupation and prepare appropriate reports for the relevant decision body of the Council”
- 1.10 On 5 November 2020, the Housing and Customer Services Working Group recommended to Cabinet to continue to research and gather further evidence to help establish whether additional House in Multiple Occupation (HMO) licensing or selective licensing of the private rented sector was justified.
- 1.11 In addition Planning Policy presented a report to Development Control Committee on 28 October 2020 to recommend to Full Council that further research was undertaken to establish robust evidence to determine the justification and role for designating Article 4 Direction(s).
- 1.12 Both of these committee decisions were agreed and officers from Private Sector Housing and Planning Policy jointly procured the services of a consultancy to undertake the required additional research.
- 1.13 The Building Research Establishment were successful with their quote and project proposal and have provided the Council with a report on their findings which is appended to this Committee report. Planning Policy will be presenting the research findings in terms of potential Article 4 directions at a later date to Planning Policy Committee.

Additional HMO Licensing

- 1.14 This type of scheme applies where a local authority has evidence that a significant proportion of the HMOs in its area are being managed sufficiently ineffectively as to give rise, or to be likely to give rise, to one or more particular problems either for

those occupying the HMOs or for members of the public.

- 1.15 Properties falling within this additional licensing regime could include properties occupied by 3 or 4 people living together as 2 or more separate households, self-contained flat or converted building. An additional HMO licence could also be required for any purpose-built self-contained flat, which is in a block of 3 or more self-contained flats.
- 1.16 The scope of the additional HMO licensing regime could also include any building that has been converted into and which consists entirely of self-contained flats, less than two-thirds of which are owner-occupied, and where the building works to convert the property into self-contained flats did not meet and still do not meet appropriate building standards. Such properties are known as Section 257 HMOs.
- 1.17 The benefits of introducing this scheme would mean that additional properties would be brought within the scope of a proactive inspection regime i.e. required to obtain a licence, therefore the process as described above for the mandatory licensing would apply i.e. meeting minimum standards, provision of an application form, fee and certificates and the fit and proper person assessment. This would ensure a greater proportion of the private rented sector housing stock is inspected to and regulatory steps are undertaken to ensure they meet the minimum standards. This regulatory activity would be resourced from the licence fees set by the Local Authority and levied on the landlords.
- 1.18 This type of scheme requires landlords who own a HMO that falls within the additional licensing scheme to obtain a licence from the council, therefore putting the emphasis on the landlord to licence rather than relying on tenants to make complaints about the conditions with their property. It is a criminal offence to operate a licensable HMO without a valid licence and landlords may face prosecution, receive a Civil Penalty Notice or a reduced licensing period in consequence of any breach found. With the mandatory scheme linking the requirement to five persons sharing it has been noted that a number of landlords are reducing their occupancy to 4 or less to avoid licensing. The properties would still be required to meet minimum standards, but the Council is unable to enforce additional controls through the licensing regime. Nor would the Council currently check if minimum standards are being met in properties that fall outside of the mandatory HMO licensing regime, except when investigating complaints.
- 1.19 A licence may include such conditions as the local authority consider appropriate for regulating all or any of the following:
- The management, use and occupation of the house concerned, and
 - Its condition and content
- 1.20 Examples of this could include:
- Conditions imposing restrictions or prohibitions on the use or occupation of parts of the house
 - Conditions requiring reasonable steps to prevent or reduce anti social behaviour by persons visiting or occupying the house
 - Conditions requiring facilities and equipment to meet minimum standards
 - Conditions requiring facilities and equipment to be kept in repair and proper

working order.

- Conditions requiring the licence holder or the manager of the house to attend training courses in relation to management of the HMO

1.21 The licensing regime provides for a means by which a single party takes responsibility for the property and to ensure that it is managed effectively.

Summary of Building Research Establishment (BRE) Findings – Additional HMO Licensing

1.22 There is an estimated total of 1,396 HMOs in Arun, of which approximately 391 come under the mandatory licensing scheme.

1.23 Marine ward has the highest number of HMOs (193 HMOs, 10% of private rented stock in the ward), followed by River ward (177 HMOs, 9%) and Hotham ward (156 HMOs, 14%). The HMOs in all three of these wards stand out as also having high levels of category 1 hazards as assessed under the Housing Health and Safety Rating System.

1.24 There are 636 buildings with the potential to be a section 257 HMO in Arun. These are properties that have been converted to self-contained flats, the conversion work did not comply with the Regulations and less than two thirds of the flats are owner occupied (the “Section 257 HMO”).

1.25 River, Hotham and Marine have a significant proportion of private rented dwellings located within the 20% most deprived Local Super Output Areas (LSOAs) in England. In addition incidents of Anti-Social Behaviour in recent years (2019 and 2020) have been highest in River and Marine wards.

1.26 This data therefore indicates that due to high levels of disrepair and areas of deprivation within the wards of Marine, River and Hotham that the criteria for additional HMO licensing has been met. These HMOs are not being managed sufficiently effectively and therefore are giving rise or potentially giving rise to problems for the occupants and/or members of the public. The BRE support that additional HMO licensing within these wards would assist in targeting improvements.

Selective Licensing in the private rented sector

1.27 Selective Licensing is different to additional licensing as it covers all private rented sector properties to tackle problems in the district or parts of, caused by low housing demand, significant anti-social behaviour, poor property conditions, an influx of migration, high level of deprivation or high levels of crime.

1.28 With effect from 1 April 2015, the “Housing Act 2004: Licensing of Houses in Multiple Occupation and Selective Licensing of Other Residential Accommodation (England) General Approval” came into force. This requires local authorities to obtain confirmation from the Secretary of State to introduce any selective licensing scheme which would cover more than 20% of their geographical area or would affect more than 20% of privately rented homes in the local authority area.

1.29 Selective licences are required for houses within the designated area where the whole of the house is occupied either under a single tenancy or licence or under two or more tenancies or licences in respect of different dwellings contained in it. There are a number of exemptions to the Selective Licensing regime as follows (as well as for business tenancies):

- A tenancy or licence is exempt from the selective licensing if it is granted by a registered social landlord;
- A prohibition order is in force;
- Agricultural tenancies;
- The property is managed/controlled by a local housing authority or public body;
- The building is regulated under other legislation (e.g. care homes);
- The building is occupied by students controlled/managed by a University/College (who subscribe to an Approved Code of Practice);
- The occupier is a Member Of The Family of the landlord/licensor who himself holds under a lease of the property for a minimum of 21 years;
- Holiday lets;
- The occupier shares any amenity (i.e. a toilet bathroom kitchen or living room) with the landlord/licensor or a Member Of The Family of the landlord/licensor

1.30 Generally, the same rules apply when granting a Selective Licence as with a mandatory HMO licence. The main differences are that:

- It is mandatory to take up references for a prospective tenant before letting a property subject to Selective Licensing; and
- Unlike HMOs the licensing authority does not have to consider suitability for letting or amenity standards when granting a selective licence. However, the licence holder must still be a fit and proper person.

1.31 The Government guidance on selective licensing states that when considering whether to make a selective licensing designation a local authority must first identify the objective or objectives that a designation will help to achieve. In other words it must identify whether the area is suffering problems that are caused by or are attributable to any of the criteria for making the designation and what it expects the designation to achieve, for example, an improvement in property conditions in the designated area.

Summary of Building Research Establishment Findings - Selective Licensing

1.32 The report identifies that the overall percentage of dwellings in the private rented sector across Arun is 19% which is comparable to the national average of 19%. Marine, River and Hotham have a percentage of private rented sector dwellings greater than the national average, 52.8%, 40.5% and 39.2% respectively.

1.33 If a selective licensing scheme was introduced in Marine, River, Hotham then confirmation from the Secretary of State would be required as the number of privately rented homes within these three wards constitutes more than 20% of the privately rented homes within the local authority area.

1.34 The BRE data suggests that there are issues of disrepair, deprivation and anti social behaviour in these wards across the wider private rented sector. However, the Council must identify the objective or objectives that the designation will help to

achieve, and government guidance states that a designation for selective licensing should only be made where there is no practical and beneficial alternative. It could be argued based on the HMO data in these wards that an additional HMO licensing scheme would improve the property conditions rather than having to licence the whole of the private rented sector. This is not therefore the recommended option.

Consultation

- 1.35 Before introducing an additional HMO or selective licensing scheme the local authority is required to undertake a 10 week meaningful consultation with those likely to be affected and also includes those who live, work or operate a business in adjoining local authority areas where they will be affected. Consideration must be given to any representation made in accordance with the consultation.
- 1.36 The consultation should be informative, clear and to the point so the proposal is readily understood. It should inform local residents, landlords, letting agents and businesses about the proposed designation, giving the reasons for proposing it, why alternative remedies are insufficient, demonstrating how it will tackle specific problems together with other specified measures and describing the proposed outcome of the designation. It should also set out the proposed fee structure and level of fees the authority is minded to charge (if any). Consultees should be invited to give their views, and these should be considered and responded to.
- 1.37 Once the consultation has been completed the results should then be published and made available to the local community. This should be in the form of a summary of the responses received and should demonstrate how these have either been acted on or not, giving reasons for the decision.
- 1.38 Following this 10 week consultation period the proposed scheme can then come into force no earlier than 3 months after the designation has been approved and will be in operation for a maximum of 5 years. The operation of the proposed scheme would need to be reviewed from time to time and can be revoked at any time subject to notice of the decision being published.
- 1.39 A small benchmarking exercise has been undertaken with Local Authorities that have recently implemented additional HMO licensing schemes and they have emphasised the importance of the consultation stage and using the opportunity to engage with a range of stakeholders. Examples of methods that have been employed include:
- Online questionnaire
 - Information on the Council's website
 - Information to be included on neighbouring local authority websites.
 - Press releases, residents magazines, social media
 - Landlord forums
 - Surgeries within wards affected
 - Stakeholders events – tenants, letting agents, voluntary organisations, charities
- 1.40 In addition the benchmarking established that on average a Full Time Equivalent (FTE) resource was required to produce a consultation report which will form part of the process, this will detail the reasons for introducing the scheme, provide relevant

statistics and data, provide details of the proposed fee structure and minimum standards that the properties will be required to meet.

1.41 Any response to the consultation will need to be considered and responded to and then a final report will be produced summarising these. This report will be presented to members for their consideration to decide whether to agree to the designation of the scheme.

Resources

1.42 The aim is that the consultation and surrounding preparatory work would be undertaken by a member of the Private Sector Housing Team, therefore a resource will be required to backfill their position whilst they complete this piece of work. An agency member of staff would cost in the region of £45 per hour, full time for a period of 6 months would be £39,960. This would be specifically to undertake the consultation work, and once this has been completed a report summarising the consultation responses will be provided to members to review and decide whether to implement the licensing scheme. If members agree to implement a licensing scheme then additional resources will be required and this will be a budget growth.

1.43 With any licensing scheme fees can be charged to cover the cost of administering the scheme. An analysis of the current mandatory licensing regime has been undertaken to ensure the Council has used a clear evidence base to set fees in order to fully recover the allowable costs it incurs in regulating these properties. A similar review would be required if an additional licensing scheme was implemented and this would also form part of the consultation process.

1.44 Growth in establishment would be required in order to administer any scheme which would potentially require 1FTE Team Leader position (Scale 11/MG3), 2 FTE HMO Officer/Environmental Health Officer (Scale 8/SO2) and 0.5FTE Technical Support Assistant post (Scale 4). The annual growth in the establishment of 3.5 FTE's as above would require an additional £161,000 (£805,000 over 5 years) which if the scheme is approved, would require approval of supplementary funding.

1.45 Fees are currently set on a sliding scale based on the number of occupants, however, across 344 extra properties that would fall within the scope of the proposed additional HMO licensing scheme, this would equate to an average license fee of something in the region of £1,000.

1.46 In view of this potentially over a 5 year period this would provide an income of approximately £344,000.

1.47 Income will not be received equally over the 5 year period, Officers have found with the existing mandatory scheme that there is initial work in identifying HMOs and also the enforcement work involved in ensuring licences are obtained. From the administration of the mandatory HMO licensing scheme there is not a clear profile for receipt of income and it will not be evenly spread across the five years. It is expected that year 1 will be relatively low as the scheme is introduced and applications are administered and the year 2 and 3 will see an increase.

1.48 It should be acknowledged that some of the initial work in identifying licensable HMOs will not be cost recoverable. The fees will recover costs for:

- Processing of license application, data entry and receipt of fee
- Officer pre-inspection checks

- Property inspection
- Officer assessment against HMO minimum standards and HHSRS
- Production of draft license and consultation with all interested parties
- Issuing of full licence
- Property inspection to review and ensure conditions have been met

1.49 The licence fee does not cover costs associated with proactively identifying licensable HMOs, publicity or setting up the scheme and any potential enforcement activity associated with finding unlicensed HMOs.

1.50 Section 257 building will also bring their own challenges in that Officers will need to confirm that they do not meet current building regulations and over two thirds of the flats are rented. The building and flats could be in different ownerships therefore access and inspections could be more time consuming than for a 3 or 4 bed shared house for example.

1.51 Additionally, when HMOs are licensed most will have conditions attached in relation to works that are required to bring the properties up to minimum standards. Licence holders are given timescales in which to carry out these works, and officers will monitor to ensure they are completed, this in turn has an impact on officer time.

1.52 In view of this it is important that any licensing scheme has sufficient resources to ensure that it can be implemented and enforced effectively.

2. PROPOSAL(S):

2.1 Agree to instigating the consultation process for a proposed additional licensing scheme for houses in multiple occupation for the wards Marine, Hotham and River, to cover privately rented properties occupied by three or four people making up two or more households and properties converted into self-contained flats that meet the definition of Section 257 HMOs.

2.2 Recommend a supplementary estimate of up to £40,000 to Policy and Finance Committee and Full Council for additional resources to support the consultation process required to implement the additional licensing scheme for houses in multiple occupation. This is a Band D Council Tax equivalent of 63p.

3. OPTIONS:

Alternatives to the recommendations:

3.1 To agree not to pursue additional HMO licensing. Officers would therefore continue to investigate complaints reactively rather than being able to proactively tackle the standard of accommodation through inspection.

3.2 To employ additional staff to implement a proactive inspection regime without introducing additional HMO licensing of the private rented sector. This approach would assist with tackling poor housing conditions, but without the creation of a licensing scheme enforcement powers are more restricted. This option would also require additional funding from the Council's general fund to recruit staff and unlike with a licensing scheme costs cannot be recovered through fees.

3.3 To agree to pursue selective licensing. The data does not significantly supporting this

course of action in advance of introducing additional HMO licensing which should address the property condition issues within the wards identified.		
4. CONSULTATION:		
Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council		X
Relevant District Ward Councillors		X
Other groups/persons (please specify) Finance, Legal, Residential Services, Community Safety	X	
5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)	YES	NO
Financial	X	
Legal	X	
Human Rights/Equality Impact Assessment	X	
Community Safety including Section 17 of Crime & Disorder Act		
Sustainability		X
Asset Management/Property/Land		X
Technology		X
Other (please explain)		
6. IMPLICATIONS:		
<p>6.1.1 Financial: The report requires a supplementary estimate of up to £40,000 be requested from Policy and Finance Committee and Full Council for additional resources to support the consultation process required to implement the additional licensing scheme for houses in multiple occupation. This will be reported to Policy and Finance Committee/Full Council as appropriate. This is a Band D Council Tax equivalent of 63p. This is a non-recurring commitment and will be financed from balances in 2022/23.</p> <p>6.1.2 In addition it is expected that over a 5 year period the recommendation would provide an income of £344,000. If approved, this income will be included in future MTFs projections.</p> <p>6.1.3 If the scheme is approved a further growth in the permanent establishment would be required of £161,000 or £805,000 over the 5 years. This report concerns funding for consultation only. If the scheme is to be introduced, a further report will be presented to this committee outlining the establishment growth.</p> <p>6.1.4 The projections indicate increased spend of £805,000 over 5 years and increased income of £344,000; a net budget growth of £461,000. This should be considered if the scheme is implemented.</p> <p>6.2 Legal: To implement an additional HMO licensing scheme a legally prescribed consultation process must be followed. Increased enforcement and potential appeals via the First Tier Tribunal will impact on the resources of the Legal Services Team.</p>		

6.3 Equality: No adverse impacts on protected characteristics have been identified but a formal consultation for an additional licensing scheme would provide the opportunity for further consideration.

7. REASON FOR THE DECISION:

7.1 The Council's vision sets out that we will be "delivering the right homes in the right places" and that to achieve this, amongst other measures, the Council will "ensure the existing housing stock in the district (private sector and council owned) is maintained to a high standard". Should the council decide as a consequence of the consultation proposed here to introduce additional HMO licensing in the three wards, it will directly contribute to ensuring that the existing housing stock in the district (private sector Houses of Multiple Occupation) is maintained to a high standard".

7.2 The proposal also directly delivers on the quality aspect of the Full Council motion: *"The Council is asked to support a request for officers to explore what options might exist for introducing further controls on the definition, number and quality of homes in Multiple Occupation and prepare appropriate reports for the relevant decision body of the Council"*.

8. BACKGROUND PAPERS:

Equality Impact Assessment

Report to and Decision of Housing and Customer Services Working Group 5 November 2020 - [Arun District Council](#)

Building Research Establishment – Draft - Additional Analysis of the Private Rented Sector, including HMOs

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EQUALITY IMPACT ASSESSMENT

Name of activity:	Consultation on introducing additional Houses in Multiple Occupation licensing in three Wards	Date Completed:	09/06/2022
Directorate / Division responsible for activity:	Place/Technical Services	Lead Officer:	Louise Crane
Existing Activity	N	New / Proposed Activity	Y
		Changing / Updated Activity	N

What are the aims / main purposes of the activity?

To obtain views from stakeholder on introducing a licensing regime to improve standards/quality of houses in multiple occupation

What are the main actions and processes involved?

to engage with a range of stakeholders (inc. tenants & private sector landlords, letting agents, voluntary sector organisations).

Examples of methods that have been employed include:

- Online questionnaire
- Information on the Council's website
- Information to be included on neighbouring local authority websites.
- Press releases, residents magazines, social media
- Landlord forums
- Surgeries within wards affected
- Stakeholders events – tenants, letting agents, voluntary organisations, charities

Who is intended to benefit & who are the main stakeholders?
tenants, private sector landlords, letting agents, voluntary organisations, charities
Have you already consulted on / researched the activity?
Yes.

Impact on people with a protected characteristic (What is the potential impact of the activity? Are the impacts high, medium or low?)		
Protected characteristics / groups	Is there an impact (Yes / No)	If Yes, what is it and identify whether it is positive or negative
Age (older / younger people, children)	N	
Disability (people with physical / sensory impairment or mental disability)		Consultation with Communications Team to obtain advice on how to ensure those with disabilities can engage. Use of accessible venues for stakeholder events.
Gender reassignment (the process of transitioning from one gender to another.)	N	
Marriage & civil partnership (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognized for same-sex couples)	N	
Pregnancy & maternity (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	N	
Race (ethnicity, colour, nationality or	Y	Consultation with Communications Team to obtain advice on how to ensure those with limited

national origins & including gypsies, travellers, refugees & asylum seekers)		or no English language skills can engage.
Religion & belief (religious faith or other group with a recognised belief system)	N	
Sex (male / female)	N	
Sexual orientation (lesbian, gay, bisexual, heterosexual)	N	
Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	Y	Many of the tenants of HMOs will be at a socio-economic disadvantage. Social media and outreach events are intended to be a means of obtaining views, as one of a range of means of gathering feedback on the proposals.

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What evidence has been used to assess the likely impacts?

Experience from other Local Authorities who have conducted such consultations. Experience gained within the Council regarding our community, and effective (and in-effective) means of engaging and consulting.

Decision following initial assessment

Continue with existing or introduce new / planned activity	Y	Amend activity based on identified actions	N
---	---	---	---

Action Plan

Impact identified	Action required	Lead Officer	Deadline

Monitoring & Review	
Date of last review or Impact Assessment:	NA
Date of next 12 month review:	NA
Date of next 3 year Impact Assessment (from the date of this EIA):	NA

Date EIA completed:	09 June 2022
Signed by Person Completing:	Nat Slade

BRE Client Report

BRE Integrated Dwelling Level Housing Stock Modelling and Database for Arun District Council: Additional Analysis of the Private Rented Sector, including HMOs

Prepared for: Louise Crane
Date: 14 January 2022
Report Number: P104090-1094 Issue: 1

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Date 14 January 2022

Signature

Three handwritten signatures in black ink are shown, corresponding to the names listed above: Fiona MacKenzie, Nicholas Hay, and Jennifer Potter.

Authorised by

Name Megan Waller

Position Head of Insights & Consultancy

Date 14 January 2022

Signature

A handwritten signature in black ink, reading 'mwaller', is shown below the name.

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Executive summary

- Arun District Council commissioned BRE to undertake an extension to previous work on the provision of housing stock modelling services to the Council. The additional work was intended to identify HMOs in Arun and analyse their location and condition to determine if there is evidence for further regulation of the private rented sector, such as establishing additional HMO Licensing, Article 4 Direction under the Town and Country Planning Act 1990 or Selective Licensing.
 - This analysis follows on from work previously carried out by BRE for Arun District Council in 2020 to assist with gathering intelligence on the housing stock in their area with a particular emphasis on the private stock. The outputs from this project included a report 'BRE Integrated Dwelling Level Housing Stock Modelling and Database' for Arun District Council and access to the resulting model via an online system known as the Housing Stock Condition Database (HSCD).
 - In the previous project the Council provided Tenancy Deposit Scheme data sets. The BRE models also integrated Energy Performance Certificate (EPC)¹ data. As a result of this, for Arun District Council, it was possible to use observed characteristics from the EPC data within the parts of the model relating to energy. The use of this observed data led to more accurate energy models for these cases, which accounted for 40,082 addresses (53.9% of the total stock) in Arun. The Council also commissioned the inclusion of Land Registry Commercial and Corporate Ownership Data (CCOD) and Overseas Companies Ownership Database (CCOD).
 - The additional work for this current report involved the following:
 - Integration of additional data provided by the Council – register of Licensable Houses in Multiple Occupation (HMOs) and updated Tenancy Deposit Scheme data. These additional data were used to inform tenure by identifying private rented properties, and to focus the analysis of HMOs.
 - Re-run of the BRE Housing Stock Model to incorporate these additional data sets.
 - Specialist analysis of the private rented sector – identification and analysis of potential HMOs (including mandatory licensable HMOs) and their condition; providing an assessment on buildings with potential for being Section 257 HMOs; analysis of private rented stock focussing on the selective licensing criteria including property condition migration, ASB, and deprivation.
 - This report describes the additional work and analyses the results obtained from the integrated model and Housing Stock Condition Database (HSCD). Since the stock models were re-run to incorporate the additional data provided by the Council on HMOs and tenancy deposit data, the updated data will also be provided on the HSCD.
 - The headline results for this additional analysis are provided on the following page:
-

¹ EPCs are an indication of how energy efficient a building is - with a rating from A (very efficient) to G (inefficient). They are required whenever a property is built, sold or rented.



Summary of private rented sector analysis

HMOs

There is an estimated total of 1,396 HMOs in Arun, of which approximately 391 come under the mandatory licensing scheme. *See full results*

Marine ward has the highest number of HMOs (193 HMOs, 10% of private rented stock in that ward), followed by River ward (177 HMOs, 9%) and Hotham ward (156 HMOs, 14%). The HMOs in all three of these wards stand out as also having higher levels of estimated category 1 hazards (Marine 8%, River 5%, Hotham 9%). *See full results*

There are 636 buildings with the potential to be a Section 257 HMO in Arun. Arundel & Walberton and River wards have the highest numbers of potential Section 257 HMOs (82, 81). This is particularly significant for Arundel & Walberton as this is a much higher proportion of the ward's 579 private rented sector dwellings compared to River ward's 1,907. *See full results*

Private rented sector including selective licensing

Overall, the percentage of dwellings in the private rented sector across Arun is 19% which is comparable to the national average of 19%. Of the 23 wards in Arun, 7 have a percentage of private rented sector dwellings greater than the national average, in particular Marine (52.8%), River (40.5%) and Hotham (39.2%). *See full results*

Two analysis area within Arun were identified based on levels of private rented stock, which were a) 3 wards in excess of 30% and b) 4 wards with 19-30% (i.e. above the national average of 19%).

Of the wards within Arun with over 30% private rented stock, Marine and River wards have the highest level of category 1 hazards (9%) and disrepair (5%). Compared to Arun's overall private rented stock, all three of these wards generally tend to have slightly higher levels of each of the property condition indicators.

Of the wards in Arun with 19–30% private rented stock, Beach ward has the highest level of hazards (10%). Levels of falls hazards are also highest in Felpham West (5%). Compared to Arun's overall private rented stock, in general the wards in this category have higher levels of each of the property condition indicators.

Incidents of ASB in recent years (2019 and 2020) have been highest in River and Marine wards, with Courtwick with Toddington increasing greatly between 2019 and 2020 to have the third highest number of incidents in 2020. *See full results*

75% of private rented dwellings in Marine ward are located in the 20% most deprived LSOAs in England, closely followed by 74% in River ward. There are 52% in Hotham ward and 49% in Pevensy ward. These are all notably higher than the figure for Arun's private rented stock as a whole (27%). *See full results*

There are specific areas within the wards identified which have higher levels of private rented stock and deprivation and disrepair which could be considered for targeted interventions. *See full results including maps*



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1 Introduction

In 2020, the Council commissioned BRE's data driven solution to provide a comprehensive range of housing condition and energy efficiency variables to enable the Council to determine the most effective steps to improve the efficiency of the housing stock and improve household's health and wellbeing. The dwelling-level data also supports the Council's obligation to "keep the housing conditions in their area under review"² under the Housing Act 2004. With a housing stock of over 70,000, it is crucial that the Council can effectively identify areas for action.

The BRE Housing Stock Models provide the Council with dwelling level information on various Housing Standards Variables, focussing on private rented sector housing. These variables provide Arun District Council with detailed information on the likely condition of the stock and the geographical distribution of properties of interest. These properties are likely to be suitable targets for energy efficiency improvements or other forms of intervention, such as mitigating Housing Health and Safety Rating System (HHSRS) hazards.

The updated BRE Housing Stock Model data is provided to the Council via the online Housing Stock Condition Database (HSCD) to enable them to obtain specific information to further the reach of these improved data insights.

Arun District Council also commissioned BRE to assist with gathering intelligence on Section 257 HMOs their area. Section 257 HMOs are, by their very nature, difficult to identify as they are not typically known to the Council. To assist the Council, dwelling level information gathered in the BRE Integrated Dwelling Level Housing Stock Model project was used to rule out buildings that were unlikely to be classified as Section 257 HMOs. This resulted in a list of potential Section 257 HMOs.

1.1 Project aims

The main purpose of this project was to provide data on key private rented sector housing variables for Arun in order to establish whether there is evidence to consider introduction of additional HMO licensing schemes, Article 4 Directive or selective licensing schemes for either the entire district or specific wards. The main aims were therefore to:

- Identify and analyse potential HMOs (including mandatory licensable HMOs) and their condition.
- Provide an assessment on buildings with potential for being Section 257 HMOs.
- Analyse private rented stock focussing on the selective licensing criteria including property condition migration, anti-social behaviour (ASB), and deprivation.

1.2 Integrating local data sources

Arun provided HMO and updated TDS data which were used to update the BRE dwelling level models to provide an integrated housing stock condition database. Their data sources are shown in **Table 1**. These

² Housing Act 2004 (<http://www.legislation.gov.uk/ukpga/2004/34/contents>)



data sources were used to inform tenure by assigning these dwellings as private rented stock. The HMO data also assisted in the analysis of HMOs in Arun, providing data of known HMOs.

To allow these data sources provided by the Council to be linked to the BRE Dwelling Level Stock Models, an address matching exercise was required to link each address to the Experian address key. Address matching is rarely 100% successful due to a number of factors including:

- Incomplete address or postcodes
- Variations in how the address is written e.g. Flat 1 or Ground floor flat
- Additions to the main dwelling e.g. annexes or out-buildings

Experience indicates that, for address files in good order, match rates are around 75% - 95%. **Table 1** provides the address matching results for the data sources provided by Arun and the resulting impact on the modelling process.

Following the integration of the new data sources, the BRE Housing Stock Model was re-run generating updated model outputs which are provided in the HSCD.

Table 1: Address matching results and impact on the modelling process

Data source	Total no. of records	No. (and %) of addresses matched	Notes / impact on the modelling process
HMO data	370 – total records available	275 (91.1% of de-duplicated records)	302 – remaining records after de-duplication
TDS data	18,321 – total received	8,769 (78.7% of de-duplicated records)	11,136 – remaining records after de-duplication



2 Private rented sector analysis

This section provides analysis for the private rented sector in Arun. It covers the following analysis:

- Houses in Multiple Occupation (HMOs), including estimates of HMOs subject to mandatory licensing and assessment of category 1 hazards and disrepair in HMOs.
- Identification of potential Section 257 HMOs at building level.
- Analysis of the private rented sector, including size of the sector and distribution of private rented dwellings, assessment of category 1 hazards and disrepair and analysis of social factors and their distribution, including deprivation and migration.

2.1 Houses in Multiple Occupation (HMOs) in the Arun private sector stock

The Housing Act 2004 introduced a new set of definitions for HMOs in England from 6 April 2006³. The definition is a complex one and the bullet points below, which are adapted from web pages provided by the National HMO Network⁴, provide a summary:

- An entire house or flat which is let to 3 or more tenants who form 2 or more households and who share a kitchen, bathroom or toilet
- A house which has been converted entirely into bedsits or other non-self-contained accommodation and which is let to 3 or more tenants who form two or more households and who share kitchen, bathroom or toilet facilities
- A converted house which contains one or more flats which are not wholly self-contained (i.e. the flat does not contain within it a kitchen, bathroom and toilet) and which is occupied by 3 or more tenants who form two or more households
- A building which is converted entirely into self-contained flats if the conversion did not meet the standards of the 1991 Building Regulations and more than one-third of the flats are let on short-term tenancies

The document “Houses in Multiple Occupation and residential property licensing reform”⁵ provides guidance to local authorities on changes to rules on licensing HMOs. From 1 October 2018, mandatory licensing of HMOs was extended to cover all relevant HMOs regardless of the number of storeys (compared to the previous definition which limited this to buildings of 3 or more storeys). Purpose built flats will only require a licence where there are fewer than 3 flats in the block. The requirement for the HMO to be occupied by five or more persons in two or more households will remain⁶. From 1 October 2018, the extension came into effect and those dwellings that fall under the new definition will require a licence.

³ See Sections 254-258 of the Housing Act (<http://www.legislation.gov.uk/ukpga/2004/34/contents>)

⁴ National HMO Network <http://www.nationalhmonetwork.com/definition.php>

⁵

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/670536/HMO_licensing_reforms_response.pdf

⁶ In addition, new mandatory licence conditions will be introduced relating to national minimum sleeping room sizes and provision of waste disposal.



To be classified as an HMO the property must be used as the tenants' only or main residence and it should be used solely or mainly to house tenants. Properties let to students and migrant workers will be treated as their only or main residence and the same will apply to properties which are used as domestic refuges.

The LAHS requires estimates of the number of HMOs and the number of mandatory licensable HMOs.

- Number of private sector HMOs
 - Modelled using specific criteria from a number of Experian data sources and information derived from the SimpleCO₂ model. The criteria include privately rented dwellings with 3 or more bedrooms occupied by male/female/mixed home sharers, mixed occupancy dwellings or classified as the following Experian Mosaic classifications:
 - Renting a room
 - Career Builders
 - Flexible Workforce
 - Bus Route Renters
 - Learners and earners
 - Student scene
- Number of mandatory licensable HMOs under the Government's new definition, as of 1 October 2018
 - This has been modelled using the above criteria for HMOs plus the dwelling must have 4 or more bedrooms. This will apply to both houses and converted flats.
 - Purpose built flats where there are up to two flats in the block and one or both have 4 or more bedrooms.

Table 2 summarises the results for the private sector stock in Arun, while **Table 3** shows the numbers by ward as well as the percentage of private sector dwellings which are HMOs and licensable HMOs at ward level. Marine ward has the highest number of HMOs (193 HMOs, 10% of private rented stock in that ward), followed by River ward (177 HMOs, 9%), Hotham ward (156 HMOs, 14%) and Orchard ward (143 HMOs, 21%). These four wards also have the highest numbers and proportions of licensable HMOs.

Table 2: Summary of HMOs within the Arun private sector stock out of total of 67,553 private sector dwellings

Arun	HMOs	Mandatory Licensing Scheme HMOs
Provided by Council	275	201
Modelled	1,121	190
Total	1,396	391

**Table 3:** Number (and % of private rented stock) of HMOs and mandatory licensable HMOs by ward

Ward	Dwellings - private rented stock	HMOs	Mandatory Licensable HMOs
Aldwick East	250	20 (8%)	6 (2%)
Aldwick West	262	26 (10%)	2 (1%)
Angmering & Findon	583	49 (8%)	20 (3%)
Arundel & Walberton	579	63 (11%)	18 (3%)
Barnham	506	25 (5%)	11 (2%)
Beach	564	65 (12%)	13 (2%)
Bersted	623	56 (9%)	13 (2%)
Brookfield	489	34 (7%)	10 (2%)
Courtwick with Toddington	996	80 (8%)	12 (1%)
East Preston	399	24 (6%)	4 (1%)
Felpham East	286	22 (8%)	4 (1%)
Felpham West	594	48 (8%)	9 (2%)
Ferring	182	9 (5%)	3 (2%)
Hotham	1,147	156 (14%)	57 (5%)
Marine	1,845	193 (10%)	64 (3%)
Middleton-on-Sea	355	17 (5%)	5 (1%)
Orchard	697	143 (21%)	46 (7%)
Pagham	247	14 (6%)	4 (2%)
Pevensy	426	52 (12%)	14 (3%)
River	1,907	177 (9%)	61 (3%)
Rustington East	379	37 (10%)	3 (1%)
Rustington West	675	40 (6%)	2 (0%)
Yapton	432	46 (11%)	10 (2%)

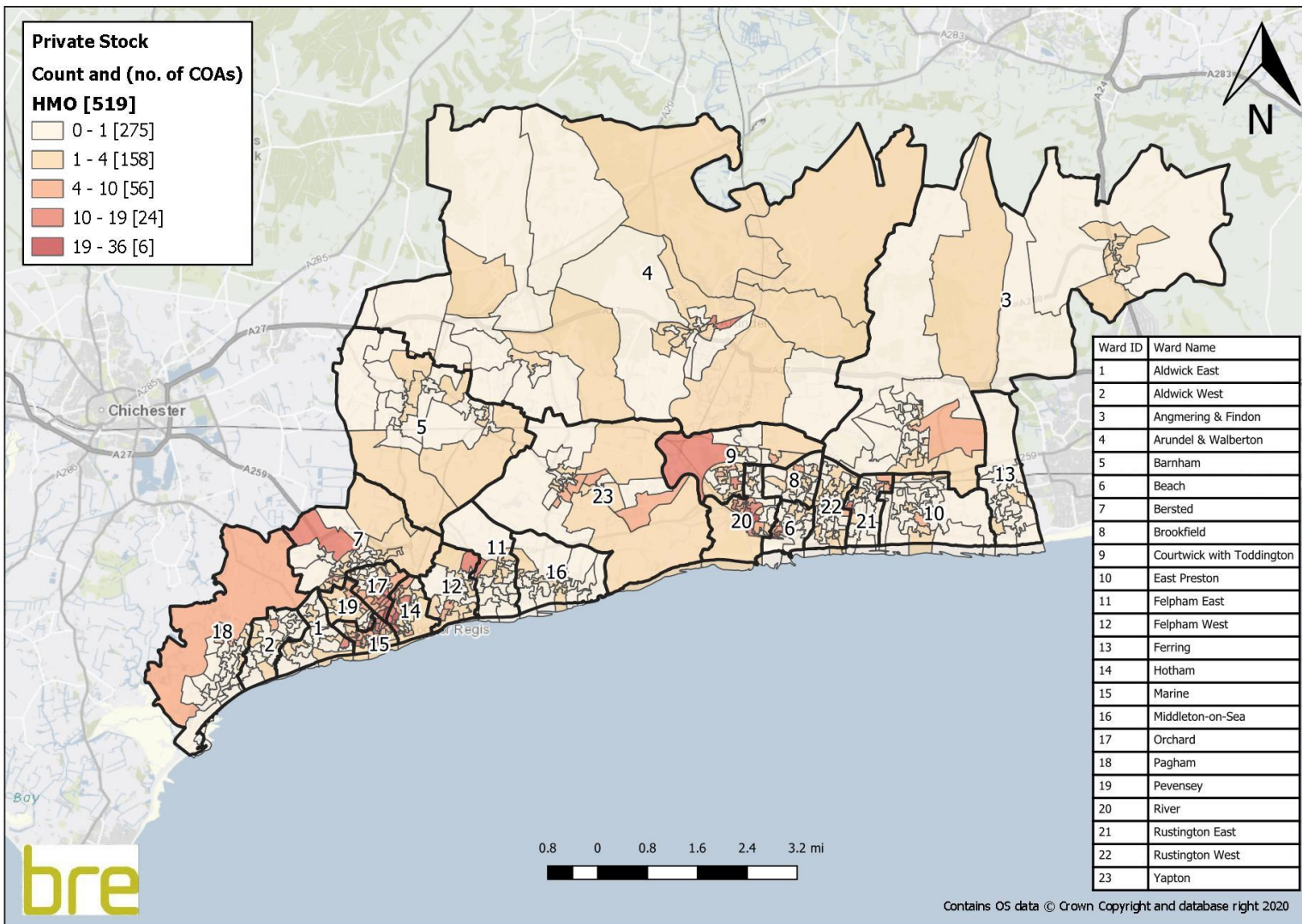


Map 1 shows the geographic distribution of HMOs and **Map 2** shows the distribution of mandatory licensable HMOs. The maps show the majority of HMOs to be concentrated in the more urban areas of Bognor Regis and Littlehampton, particularly in the Marine and River wards, which may be due to the proximity of the train stations in each of the towns as these provide direct access to London, potentially appealing to the commuter population. There are also other notable concentrations in Orchard and Hotham wards. There is a similar picture for licensable HMOs, although the distribution is also more evenly spread towards the edges of the towns. In the Appendix, **Map D. 1** and **Map D. 2** show a zoomed area of the distribution of HMOs and mandatory licensable HMOs in the coastal towns. As previously mentioned, ward level data on HMOs is available in the accompanying Housing Stock Condition Database (HSCD).

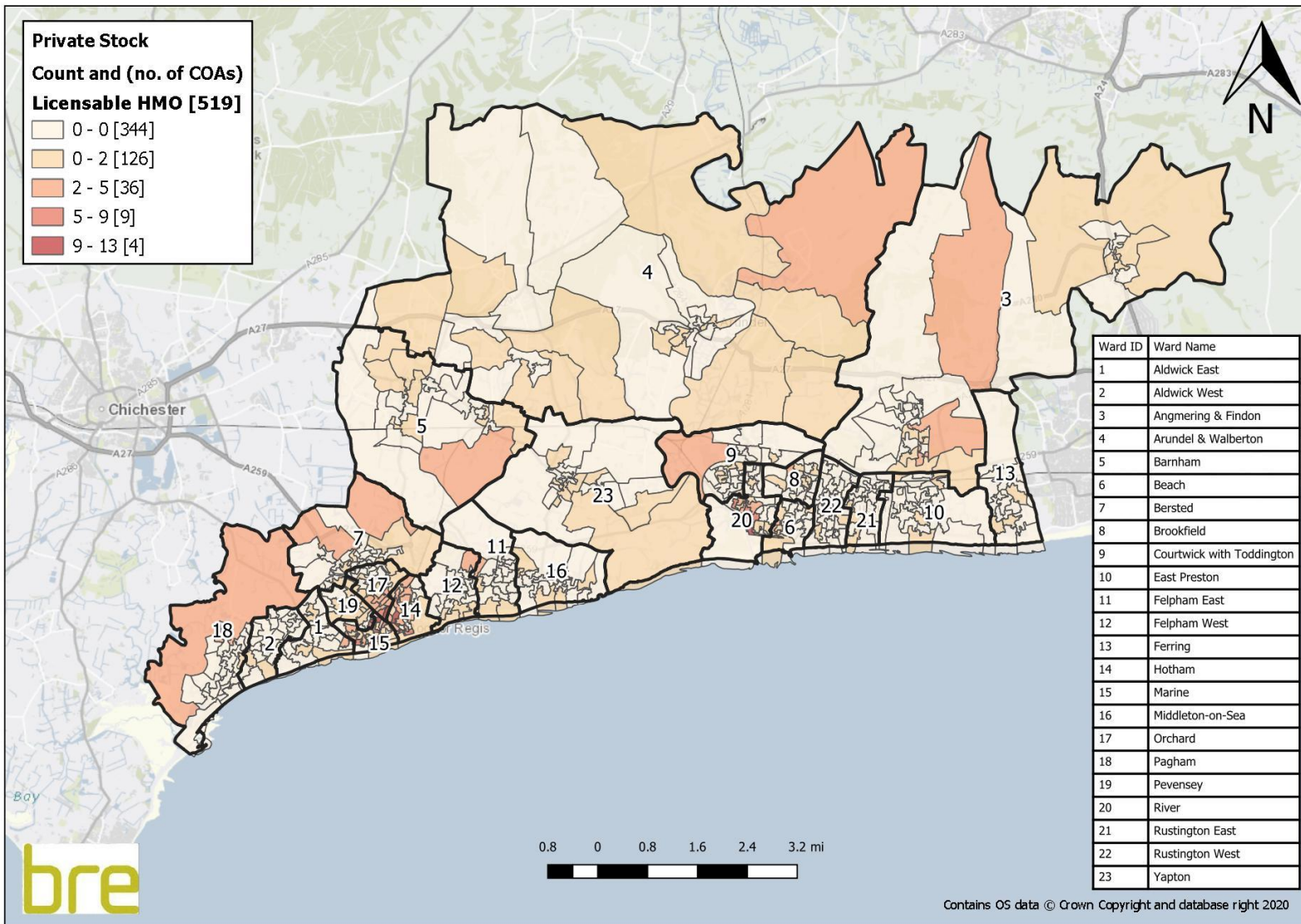
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Map 1: Count of HMOs N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound



Map 2: Count of mandatory licensable HMOs *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*





2.1.1 Housing standards variables for HMOs

HMOs compared to non-HMOs

Table 4 and **Figure 1** show the results for each of the housing standards variables in Arun for the private rented sector split into non-HMOs and HMOs. **Figure 2** compares the average SimpleSAP ratings for HMOs compared to non-HMOs.

HMOs have higher levels of all hazards, excess cold, fall hazards, disrepair, fuel poverty (low income high costs definition) and low income households. Levels of disrepair, fuel poverty (10% definition) and low income households are higher in non-HMOs, with low income household being markedly higher at 35% for non-HMOs compared to 12% for HMOs. Average SimpleSAP ratings are lower for HMOs (59) than for non-HMOs (63).

Table 4: Estimates of the percentage of private rented dwellings meeting the housing standards variables – HMOs compared to non-HMOs

Housing Standards Variable		Private rented sector stock			
		Non HMOs		HMOs	
		No.	%	No.	%
No. of dwellings		13,027	-	1,396	-
HHSRS category 1 hazards	All hazards	971	7%	158	11%
	Excess cold	378	3%	60	4%
	Fall hazards	439	3%	89	6%
Disrepair		491	4%	27	2%
Fuel poverty (10%)		852	7%	87	6%
Fuel poverty (Low Income High Costs)		2,096	16%	344	25%
Low income households		4,503	35%	172	12%



Figure 1: Estimates of the percentage of private rented dwellings meeting the housing standards variables – HMOs compared to non-HMOs

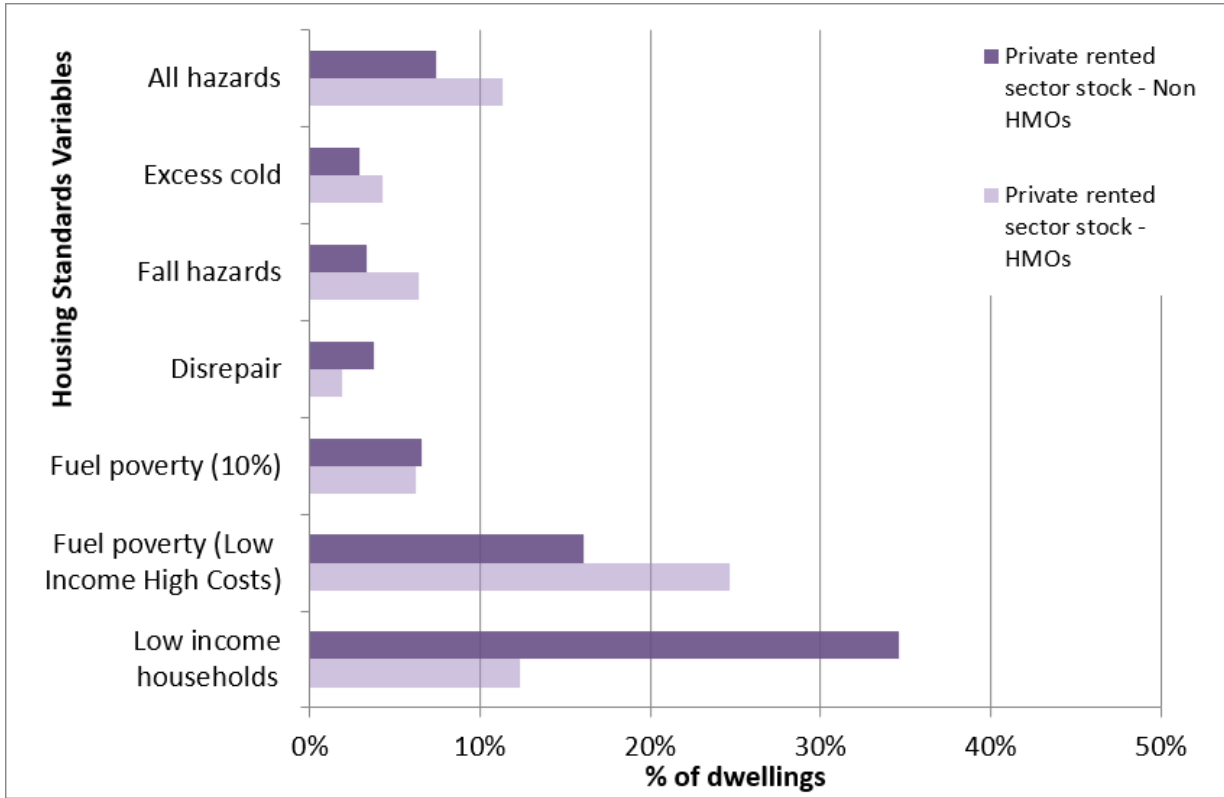
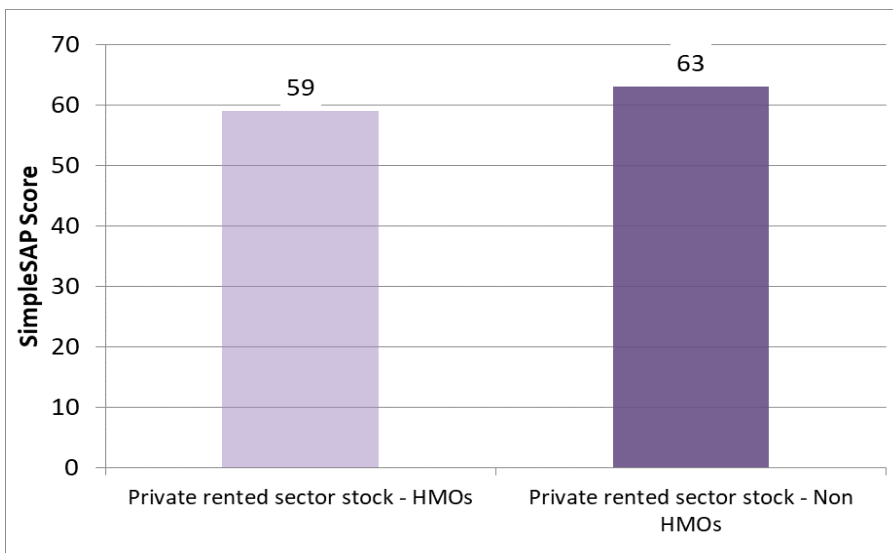


Figure 2: Estimated average SimpleSAP ratings for HMOs compared to non-HMOs in Arun





Non-licensable HMOs compared to licensable HMOs

Table 5 and **Figure 3** show the results for each of the housing standards variables in Arun for HMOs split into non-licensable HMOs and mandatory HMOs. Licensable HMOs have higher levels of all hazards, falls hazards, disrepair, fuel poverty (both definitions) and low income households. Licensable HMOs have far higher levels of fuel poverty under the low income high costs definition than non-licensable HMOs. Both have similar levels of excess cold.

Figure 4 compares the average SimpleSAP ratings for non-licensable HMOs and licensable HMOs. It is estimated that licensable HMOs have poorer SAP ratings (average 57) than non-licensable HMOs (average 60).

Table 5: Estimates of the percentage of dwellings meeting the housing standards variables - non-mandatory licensable HMOs compared to mandatory licensable HMOs

Housing Standards Variable		HMOs			
		Non-mandatory		Mandatory	
		No.	%	No.	%
No. of dwellings		1,005	-	391	-
HHSRS category 1 hazards	All hazards	99	10%	59	15%
	Excess cold	44	4%	16	4%
	Fall hazards	51	5%	38	10%
Disrepair		14	1%	13	3%
Fuel poverty (10%)		59	6%	28	7%
Fuel poverty (Low Income High Costs)		172	17%	172	44%
Low income households		121	12%	51	13%



Figure 3: Estimates of the percentage of dwellings meeting the housing standards variables - non-licensable HMOs compared to licensable HMOs

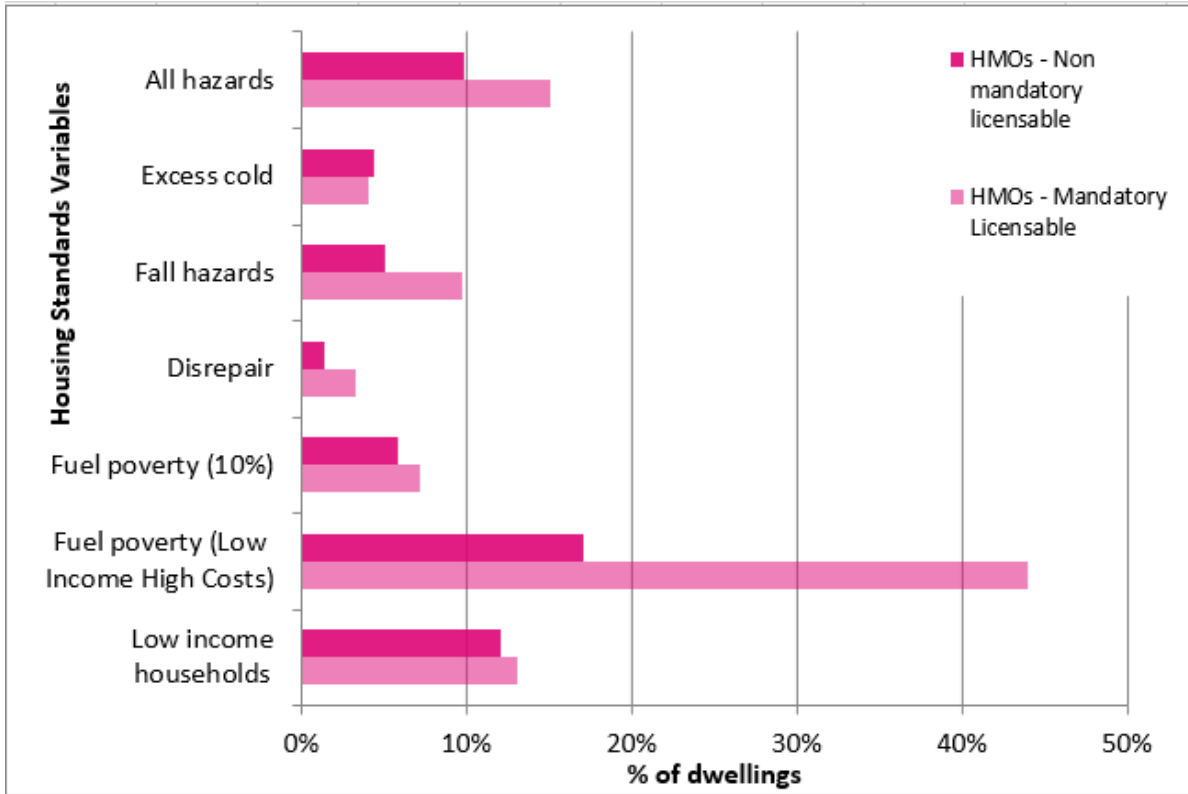
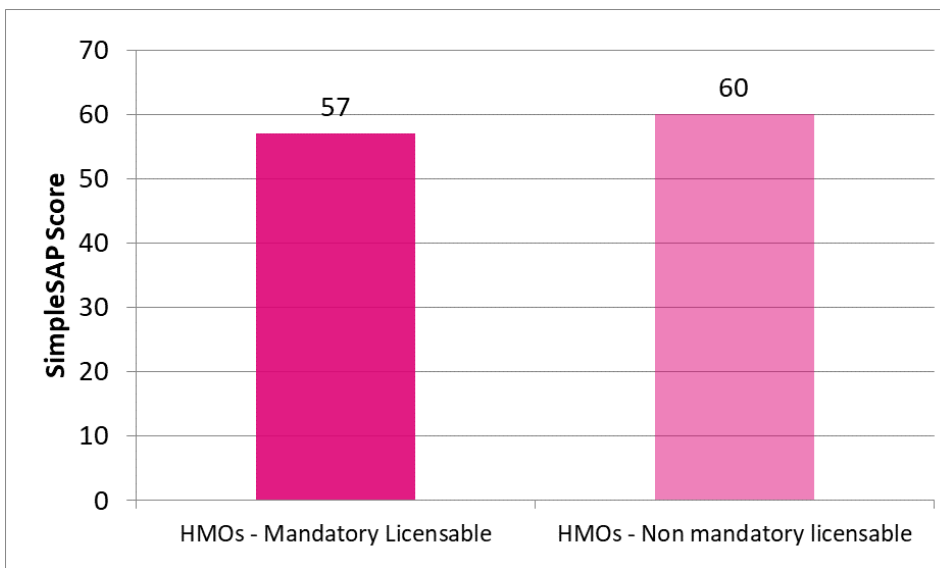


Figure 4: Estimated average SimpleSAP ratings for non-licensable HMOs compared to licensable HMOs in Arun





2.1.2 Section 257 HMOs

Section 257 HMOs are, by their very nature, difficult to identify as they are not typically known to the Council. To assist the Council, dwelling level information gathered in the BRE Integrated Dwelling Level Housing Stock Model project was used to rule out buildings that were unlikely to be classified as Section 257 HMOs. This resulted in a list of potential Section 257 HMOs.

These are buildings or a part of a building, which:

- Have been converted entirely into self-contained flats and where the conversion did/does not comply with the Building Regulation 1991 standards
- Are occupied by 3 or more people
- Are occupied by 2 or more households and
- Have less than two-thirds of the self-contained flats being owner-occupied (owner-occupiers include person(s) who have been granted a lease for a term of more than 21 years; person(s) who hold the freehold estate in the block of flats; or a member of the household of the person(s) who either hold the lease or freehold).

Methodology

To assist the Council, the following processes were used to rule out buildings that were unlikely to be classified as Section 257 HMOs:

- All non-private rented properties were removed,
- All purpose-built flats were removed,
- Dwellings were removed if they had been inspected by the Council. This included:
 - Known HMOs
 - Building control and planning records

Where any dwellings remained following the above processes, the building was marked as potentially being a Section 257 HMO.

Results

Table 6 summarises the results for Section 257 HMOs as well as the HMO and licensable HMO figures for Arun. Both the HMOs and Mandatory Licensable HMOs are dwelling level results, whilst the Section 257 HMOs are recorded at building level. Under the Section 257 HMO criteria there are a total of 636 buildings which have the potential to be Section 257 HMOs.

Table 7 shows the estimated numbers in each ward and as a percentage of private stock of HMOs and Mandatory Licensable HMOs as well as buildings identified as Section 257 HMOs.

Table 6: HMOs, Mandatory Licensable HMOs, and number of buildings with the potential to be a Section 257 in Arun

Arun	No. of private sector dwellings	HMOs	Mandatory Licensing Scheme HMOs	Section 257 HMOs
	67,553	1,396	391	636



Table 7: HMOs, Mandatory Licensable HMOs - number and percentage, and number of buildings with the potential to be a Section 257 by ward for Arun. *N.B. Section 257 HMOs are identified at building level and so cannot be expressed as a percentage of private rented dwellings*

Ward	Dwellings - private rented stock	HMOs	Mandatory Licensable HMOs	Section 257 HMOs (building level)
Aldwick East	250	20 (8%)	6 (2%)	11
Aldwick West	262	26 (10%)	2 (1%)	18
Angmering & Findon	583	49 (8%)	20 (3%)	30
Arundel & Walberton	579	63 (11%)	18 (3%)	82
Barnham	506	25 (5%)	11 (2%)	34
Beach	564	65 (12%)	13 (2%)	15
Bersted	623	56 (9%)	13 (2%)	31
Brookfield	489	34 (7%)	10 (2%)	9
Courtwick with Toddington	996	80 (8%)	12 (1%)	25
East Preston	399	24 (6%)	4 (1%)	28
Felpham East	286	22 (8%)	4 (1%)	7
Felpham West	594	48 (8%)	9 (2%)	44
Ferring	182	9 (5%)	3 (2%)	10
Hotham	1,147	156 (14%)	57 (5%)	31
Marine	1,845	193 (10%)	64 (3%)	38
Middleton-on-Sea	355	17 (5%)	5 (1%)	13
Orchard	697	143 (21%)	46 (7%)	35
Pagham	247	14 (6%)	4 (2%)	12
Pevensey	426	52 (12%)	14 (3%)	16
River	1,907	177 (9%)	61 (3%)	81
Rustington East	379	37 (10%)	3 (1%)	18
Rustington West	675	40 (6%)	2 (0%)	26
Yapton	432	46 (11%)	10 (2%)	22



2.1.3 Potential areas for investigation within Arun's HMOs

HMOs provide crucial accommodation options within the private rented sector, for groups who may not be able to afford to purchase a property. HMOs increase the options available for people which is extremely important in areas where the housing supply may be low. However, poorly managed HMOs can negatively impact the community and occupants.

Additional HMO Licensing

Under Part 2 of the Housing Act 2004⁷ Councils are able to designate additional licensing requirements across the district or specific areas, to HMOs that ordinarily do not meet the mandatory HMO licensing criteria. Such designation requires the Council to demonstrate that a significant proportion of HMOs are inadequately managed, giving rise (or likely to) to problems for either the HMO occupants or the public. Councils are able to choose how they wish to define the Additional HMO Licensing designation in terms of what they wish to include.

Article 4 Direction

Under Article 4 of the Town and Country Planning Act (General Permitted Development) (England) Order 2015⁸ the local planning Council can withdraw specified permitted development rights across a defined area. The direction can remove permitted development rights in relation to change of use with a temporary or permanent effect. An example of where the removal of a permitted development right related to changes of use may apply to a single-family dwelling (use class C3) becoming occupied by 3-6⁹ unrelated individuals to form an HMO (use class C4). As a means to manage the presence of HMOs within an area, the Council can (with sufficient evidence) remove the permitted development rights to change dwelling use to create a small HMO, providing Councils with greater control over numbers of HMOs in their District.

Table 8 shows the number of HMOs in each ward as well as the proportion of those HMOs containing a category 1 hazard or being in disrepair. Wards with high levels of HMOs and with high proportions of hazards or in disrepair may be a starting point when considering which areas to be targeted for improvement, for example via an Additional Licensing scheme or for consideration for Article 4 Direction.

The data indicates that Marine ward has the greatest number of HMOs (193), and of these 20% are estimated to have a category 1 hazard, 12% to have a falls hazard and 8% to suffer from excess cold. River ward has 177 HMOs with 11% of these estimated to have a category 1 hazard, largely due to the high level of falls hazards (10%). The third highest number of HMOs is found in Hotham ward (156), and this is closely followed by Orchard ward (143). 15% of dwellings in Hotham ward are estimated to suffer from category 1 hazards and 3% of properties are estimated to be in disrepair. Rustington East ward also stands out as whilst there are only 37 HMOs, the condition of these could be poor – with 38% are estimated to have a category 1 hazard.

⁷ Housing Act 2004 (legislation.gov.uk)

⁸ The Town and Country Planning (General Permitted Development) (England) Order 2015 (legislation.gov.uk)

⁹ Over 6 requires planning permission



Table 8: Number of HMOs and percentage of those HMOs containing a category 1 hazard or being in disrepair, by ward for Arun.

Ward	HMOs	HHSRS category 1 hazards			Disrepair
		All hazards	Excess cold	Fall hazards	
Aldwick East	20	3 (15%)	1 (5%)	2 (10%)	0 (0%)
Aldwick West	26	2 (8%)	1 (4%)	0 (0%)	1 (4%)
Angmering & Findon	49	5 (10%)	3 (6%)	2 (4%)	0 (0%)
Arundel & Walberton	63	5 (8%)	4 (6%)	1 (2%)	0 (0%)
Barnham	25	2 (8%)	1 (4%)	1 (4%)	0 (0%)
Beach	65	10 (15%)	2 (3%)	7 (11%)	2 (3%)
Bersted	56	3 (5%)	2 (4%)	1 (2%)	1 (2%)
Brookfield	34	2 (6%)	1 (3%)	1 (3%)	0 (0%)
Courtwick with Toddington	80	3 (4%)	1 (1%)	2 (3%)	0 (0%)
East Preston	24	1 (4%)	0 (0%)	1 (4%)	0 (0%)
Felpham East	22	3 (14%)	2 (9%)	1 (5%)	0 (0%)
Felpham West	48	1 (2%)	1 (2%)	0 (0%)	0 (0%)
Ferring	9	1 (11%)	0 (0%)	1 (11%)	0 (0%)
Hotham	156	23 (15%)	8 (5%)	13 (8%)	5 (3%)
Marine	193	39 (20%)	15 (8%)	23 (12%)	8 (4%)
Middleton-on-Sea	17	1 (6%)	0 (0%)	1 (6%)	0 (0%)
Orchard	143	15 (10%)	6 (4%)	7 (5%)	4 (3%)
Pagham	14	1 (7%)	0 (0%)	1 (7%)	0 (0%)
Pevensey	52	2 (4%)	0 (0%)	2 (4%)	0 (0%)
River	177	20 (11%)	2 (1%)	17 (10%)	6 (3%)
Rustington East	37	14 (38%)	10 (27%)	3 (8%)	0 (0%)
Rustington West	40	1 (3%)	0 (0%)	1 (3%)	0 (0%)
Yapton	46	1 (2%)	0 (0%)	1 (2%)	0 (0%)



2.2 Selective licensing

Selective licensing is different to additional licensing as it covers all private rented sector properties (excluding any HMOs already licensed under HMO schemes). Selective licensing must be part of the overall strategic approach taken by an Council. The main aim of selective licensing is to address the problems caused by poor quality private rented accommodation¹⁰.

Section 80 of the 2004 Housing Act¹¹ gives powers to Local Housing Authorities (LHAs) to designate geographical areas to be licensed, provided certain conditions are met. The power does not permit LHAs to require licensing of houses that have been exempted under the Selective Licensing of Houses (Specified exemptions) (England) Order 2006, or a property that is subject to a tenancy or licence granted by a body which is registered as a social landlord under Part 1 of the Housing Act 1996. Furthermore, a local housing Council will need to apply to the Secretary of State for confirmation of any scheme which covers more than 20% of their geographical area, or that would affect more than 20% of privately rented homes in the Council area. Prior to the introduction of a licensing scheme, there must be a consultation with local residents, landlords and tenants and any others likely to be affected. If the selective licensing scheme is adopted, then landlords who rent out properties in that area will be required to obtain a licence from the Council for each of their properties. Failure to do so, or if they fail to achieve minimum standards the Council can take enforcement action. More details can be found in the DCLG document “Selective licensing in the private rented sector: A guide for local authorities”¹².

The conditions which apply to Selective licensing areas are split into 3 “sets”, each of which has several conditions. Any of the three sets needs to be met in order for a Council to designate a selective licensing area. The requirements of each of the sets are summarised as follows:

Set one:

- The area has low housing demand (or is likely to become such an area)
- Selective licensing will contribute to the improvement of the social or economic conditions in the area, when combined with other measures taken in the area

Set two:

- The area has a significant and persistent problem cause by anti-social behaviour
- Some or all of the private landlords letting dwellings in the area are failing to take appropriate action to combat the problem
- Selective licensing will lead to a reduction/elimination of the problem, when combined with other measures taken in the area

¹⁰ <http://researchbriefings.files.parliament.uk/documents/SN04634/SN04634.pdf>

¹¹ http://www.legislation.gov.uk/ukpga/2004/34/pdfs/ukpga_20040034_en.pdf

¹²

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418551/150327_Guidance_on_selective_licensing_applications_FINAL_updated_isbn.pdf



Set three:

- The area has a high proportion of properties in the private rented sector, compared to the total number of properties in the area – this is suggested as being the national average as reported in the latest available English Housing Survey (currently 19%)¹³
- These properties are occupied under either assured tenancies or licences to occupy
- One or more of the following conditions is satisfied:
 - **Housing conditions** – the Council has reviewed housing conditions in the area and that it considers it would be appropriate for a significant number of properties in the area to be inspected to determine presence of category 1 or 2 hazards, or the Council intends to carry out inspections with a view to carrying out enforcement action; selective licensing, combined with other measures, will contribute to an improvement in general housing conditions in the area.
 - **Migration** – the area has recently or is experiencing high levels of migration, a significant number of properties in the area are occupied by migrants; selective licensing will contribute to an improvement in the social or economic conditions in the area and ensuring that properties are properly managed and overcrowding is prevented.
 - **Deprivation** – the area has high levels of deprivation which affects a significant number of the occupiers; selective licensing, combined with other measures, will contribute to a reduction in deprivation levels in the area. To determine if an area has high levels of deprivation the Council can look at: employment status, average income, health, access to education, training and services, housing conditions, physical environment, crime levels.
 - **Crime** – the area has high levels of crime which affects those living in the area; selective licensing, combined with other measures, will contribute to a reduction in crime levels in the area for the benefit of those living in the area.

2.2.1 Indicators for investigation

As detailed, there are various criteria which can be used to designate areas for selective licensing. The criteria which were investigated in more detail are:

- The proportion of dwellings that are privately rented
- Information on property condition - proportion of dwellings:
 - With a category 1 Housing Health and Safety Rating System (HHSRS) hazard – this is the presence of one or more of the 29 hazards covered by the HHSRS¹⁴
 - With a category 1 HHSRS hazard for excess cold

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860076/2018-19_EHS_Headline_Report.pdf

¹⁴ For a full list of hazards see - Housing Health and Safety Rating System Operating Guidance, ODPM, 2006 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf



- With a category 1 HHSRS fall hazard – these include those fall hazards where the vulnerable person is 60 or over i.e. the presence of falls associated with baths, falling on the level and falling on stairs
 - In disrepair – this is based on the former Decent Homes Standard criteria for disrepair which states that a dwelling fails this criterion if it is not found to be in a reasonable state of repair. This is assessed by looking at the age of the dwellings and the condition of a range of building components including walls, roofs, windows, doors, electrics and heating systems)
-
- Information on deprivation based on the 2019 Indices of Multiple Deprivation (IMD)¹⁵
 - Information on crime - Anti-Social Behaviour (ASB)
 - Information on migration

2.2.2 Proportions of dwellings that are privately rented overall and by ward

The percentage of stock in Arun which is privately rented is estimated to be 19%, which is comparable to the figure for England of 19%¹⁶.

There are 7 (of a total of 23) wards with private rented proportions in excess of the national average (19%) – these are depicted in **Table 9** by the thick dashed lines. Those wards with over 19% private rented stock have been further divided into 2 groups for analysis. These groups are as follows:

Wards with PRS over 30%

- Marine
- River
- Hotham

Wards with PRS between 19 - 30% (above national average of 19%)

- Beach
- Orchard
- Courtwick with Toddington
- Felpham West

Map 3 shows the location of these two analysis groups within Arun.

¹⁵ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>

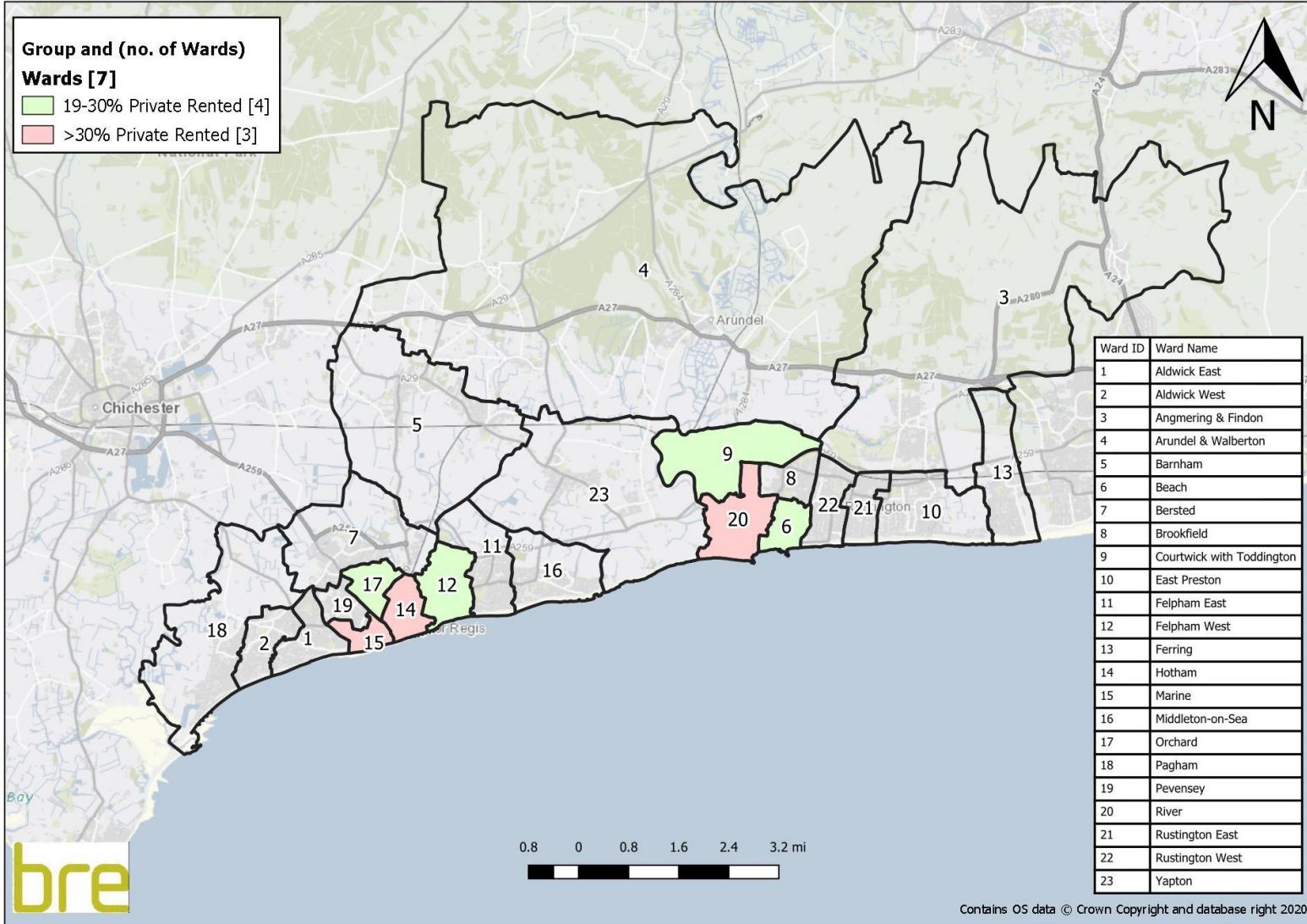
¹⁶ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/860076/2018-19_EHS_Headline_Report.pdf



Table 9: Count and percentage of estimated privately rented dwellings by ward in Arun (sorted by descending private rented proportion)

Ward	Dwellings - all stock	Dwellings - private rented	
		Count	%
Marine	3,494	1,845	52.8%
River	4,704	1,907	40.5%
Hotham	2,924	1,147	39.2%
Beach	2,337	564	24.1%
Orchard	2,895	697	24.1%
Courtwick with Toddington	4,276	996	23.3%
Felpham West	2,826	594	21.0%
Brookfield	2,656	489	18.4%
Pevensey	2,413	426	17.7%
Yapton	2,511	432	17.2%
Rustington West	4,166	675	16.2%
Bersted	3,913	623	15.9%
Arundel & Walberton	3,910	579	14.8%
Barnham	3,631	506	13.9%
Rustington East	2,823	379	13.4%
Middleton-on-Sea	2,687	355	13.2%
Angmering & Findon	4,468	583	13.0%
Felpham East	2,620	286	10.9%
East Preston	4,092	399	9.8%
Aldwick East	2,596	250	9.6%
Aldwick West	2,979	262	8.8%
Pagham	3,003	247	8.2%
Ferring	2,464	182	7.4%

Map 3: Location of the two analysis groups with proportions of private rented stock which are greater than the national average (19%) *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*





2.2.3 Information on property condition

Information on property condition is based on the presence of a category 1 HHSRS hazard (one or more of the 29 covered by the HHSRS¹⁷), a category 1 hazard for excess cold and a category 1 hazard for falls (these are fall hazards where the vulnerable person is over 60 and includes falls associated with baths, falling on the level and falling on stairs). Property condition also includes proportions of dwellings in disrepair. This is based on the former Decent Homes Standard and assesses the age of the dwelling and the condition of a range of building components – e.g. walls, roofs, electrics and heating systems.

Maps at COA level are provided for the private rented sector for the following housing standards variables in **Map 4** to **Map 7** below, and maps showing the detail of the coastal area can be found in **Map D. 3** to **Map D. 6** in the appendix:

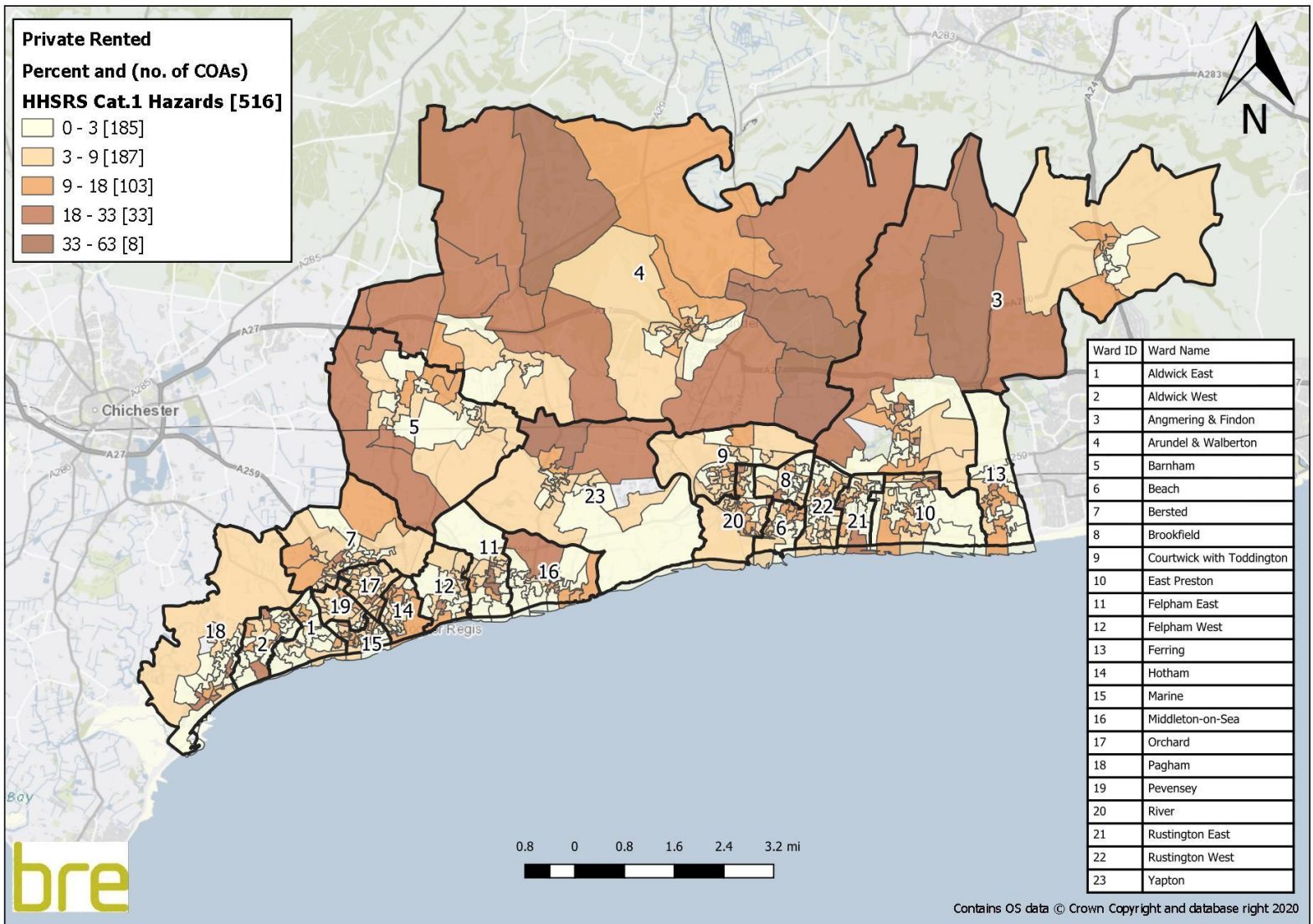
- **HHSRS**
 - The presence of a category 1 HHSRS hazard
 - The presence of a category 1 hazard for excess cold
 - The presence of a category 1 hazard for falls

- **Levels of disrepair**

Table 10 provides a summary of property condition at ward level and is split into the groups described above based on the proportion of private rented stock in each ward. This table shows that the highest levels of all hazards (13%) and excess cold (7%) are in Arundel & Walberton ward. The levels of falls hazards are fairly similar across the wards, with the highest being 5% for Felpham West, Felpham East, Bersted, and Arundel & Walberton wards. The highest levels of disrepair (6%) are in Beach ward.

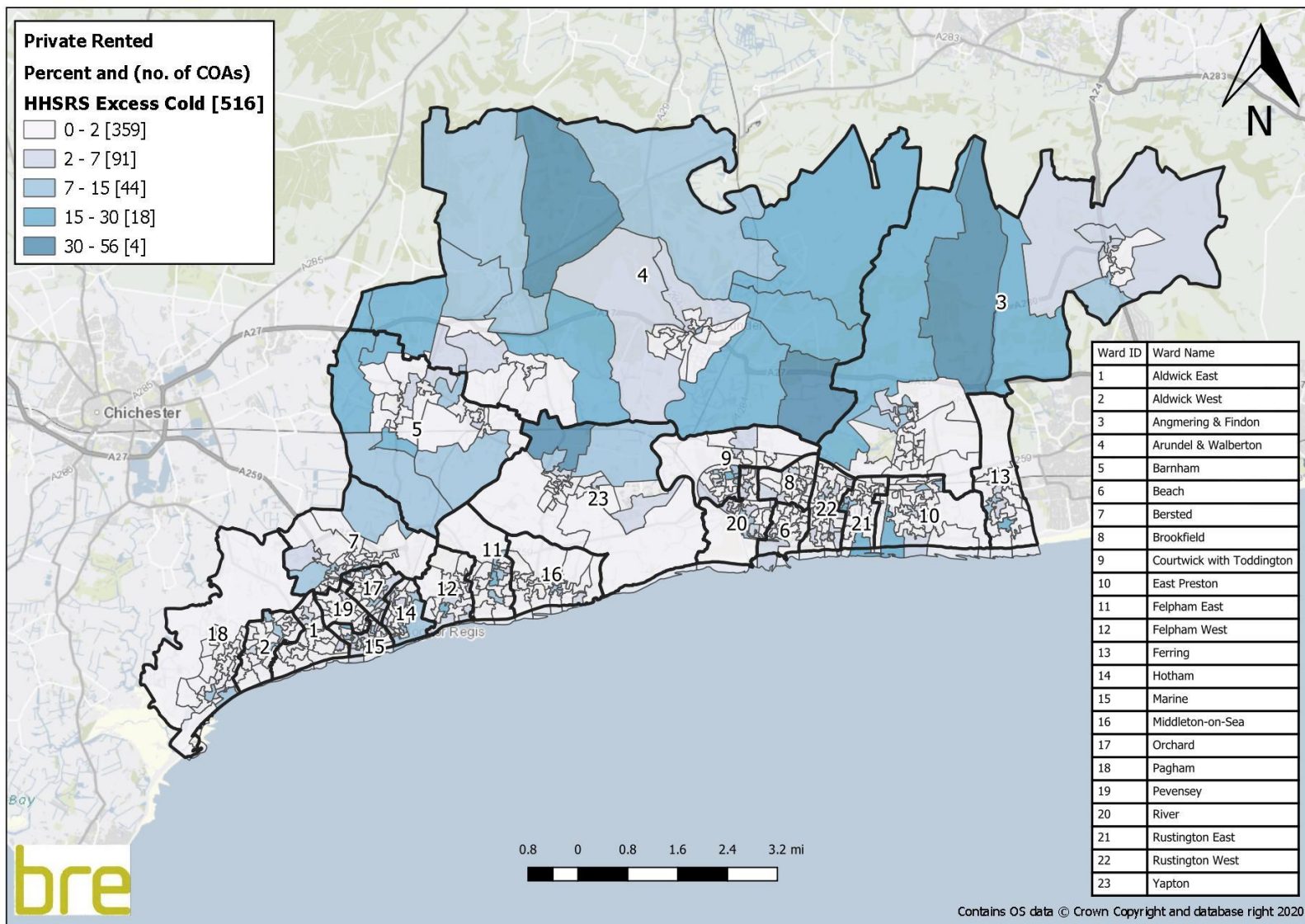
¹⁷ For a full list of hazards see - Housing Health and Safety Rating System Operating Guidance, ODPM, 2006 - https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/15810/142631.pdf

Map 4: Percentage of private rented sector dwellings in Arun with the presence of a HHSRS category 1 hazard *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*



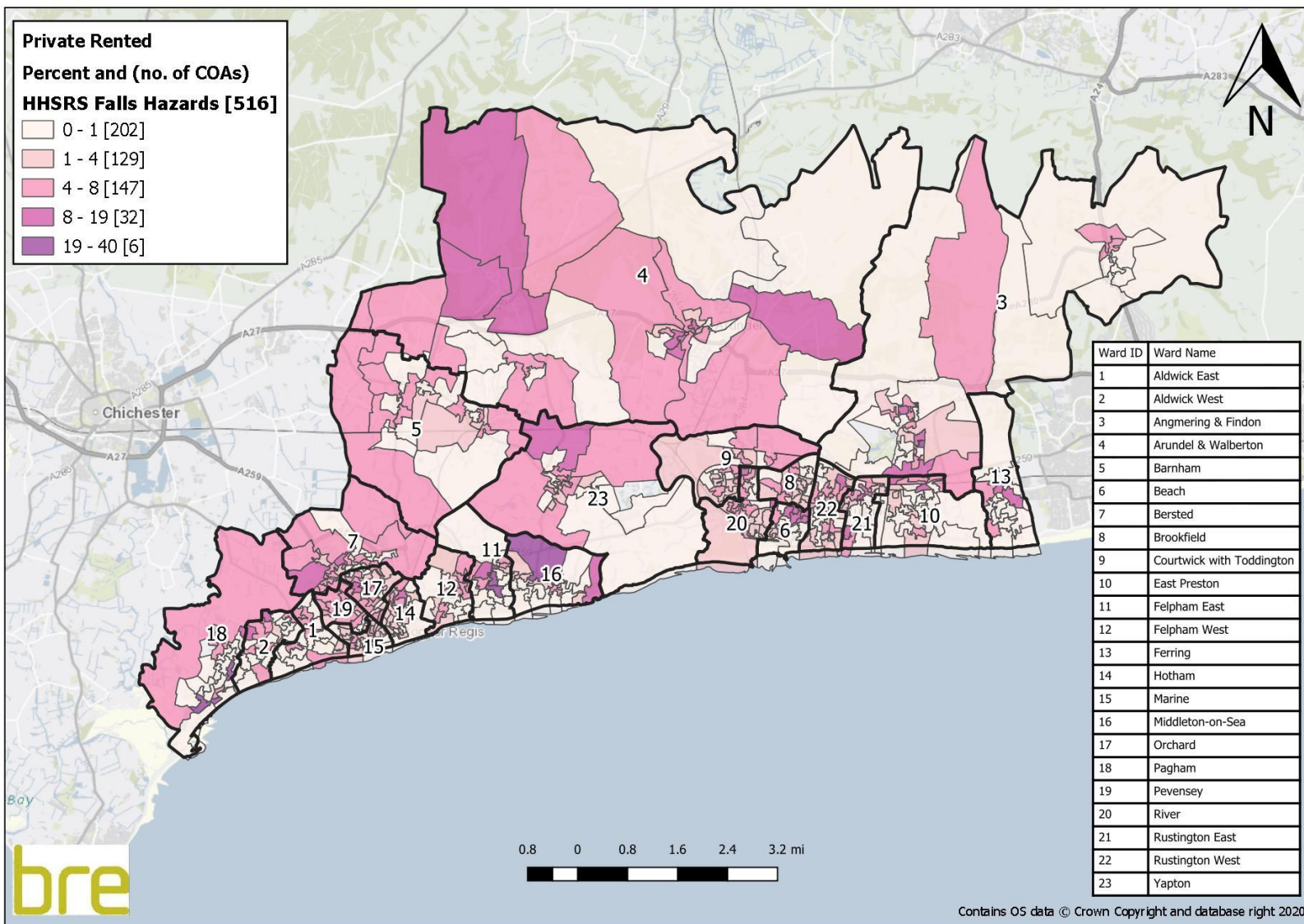
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Map 5: Percentage of private rented sector dwellings in Arun with the presence of a HHSRS category 1 hazard for excess cold *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*



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Map 6: Percentage of private rented sector dwellings in Arun with the presence of a HHSRS category 1 hazard for falls *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*



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Map 7: Percentage of private rented sector dwellings in Arun in disrepair *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*

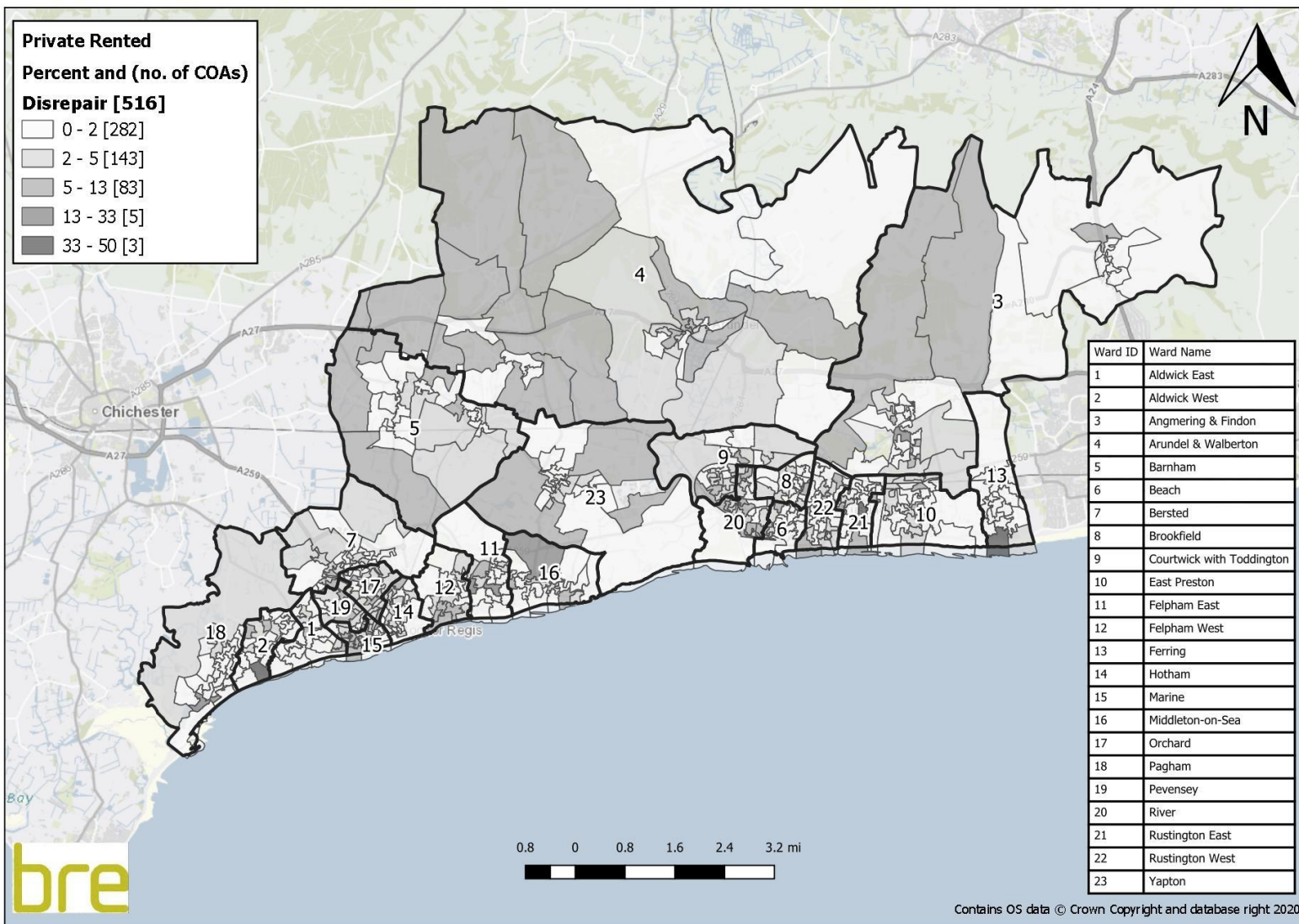




Table 10: Count and percentage of dwellings failing each of the HHSRS indicators and disrepair by ward, split into the 3 analysis groups, *private rented stock*

Ward	No. of dwellings - private rented stock	HHSRS category 1 hazards			Disrepair
		All hazards	Excess cold	Fall hazards	
Marine	1,845	157 (9%)	72 (4%)	55 (3%)	84 (5%)
River	1,907	173 (9%)	77 (4%)	73 (4%)	97 (5%)
Hotham	1,147	73 (6%)	32 (3%)	26 (2%)	34 (3%)
Beach	564	59 (10%)	24 (4%)	23 (4%)	33 (6%)
Orchard	697	65 (9%)	27 (4%)	27 (4%)	31 (4%)
Courtwick with Toddington	996	61 (6%)	15 (2%)	41 (4%)	28 (3%)
Felpham West	594	48 (8%)	15 (3%)	27 (5%)	21 (4%)
Brookfield	489	25 (5%)	4 (1%)	17 (3%)	7 (1%)
Pevensey	426	25 (6%)	2 (0%)	16 (4%)	14 (3%)
Yapton	432	29 (7%)	8 (2%)	17 (4%)	11 (3%)
Rustington West	675	44 (7%)	14 (2%)	22 (3%)	17 (3%)
Bersted	623	47 (8%)	12 (2%)	30 (5%)	19 (3%)
Arundel & Walberton	579	75 (13%)	43 (7%)	27 (5%)	25 (4%)
Barnham	506	36 (7%)	14 (3%)	19 (4%)	14 (3%)
Rustington East	379	36 (9%)	21 (6%)	11 (3%)	8 (2%)
Middleton-on-Sea	355	18 (5%)	6 (2%)	9 (3%)	8 (2%)
Angmering & Findon	583	51 (9%)	19 (3%)	25 (4%)	18 (3%)
Felpham East	286	20 (7%)	5 (2%)	14 (5%)	9 (3%)
East Preston	399	27 (7%)	9 (2%)	15 (4%)	12 (3%)
Aldwick East	250	13 (5%)	3 (1%)	7 (3%)	6 (2%)
Aldwick West	262	21 (8%)	7 (3%)	11 (4%)	10 (4%)
Pagham	247	15 (6%)	5 (2%)	10 (4%)	7 (3%)
Ferring	182	11 (6%)	4 (2%)	6 (3%)	5 (3%)



Analysis of property conditions in the private rented sector for the analysis groups

This section analyses the proportion of private rented dwellings:

- With a category 1 Housing Health and Safety Rating System (HHSRS) hazard – this is the presence of one or more of the 29 hazards covered by the HHSRS
- With a category 1 hazard for excess cold
- With a category 1 HHSRS fall hazard – these include those fall hazards where the vulnerable person is 60 or over, i.e. the presence of falls associated with baths, falling on the level and falling on stairs
- In disrepair – this is based on the former Decent Homes Standard criteria for disrepair which states that a dwelling fails this criterion if it is not found to be in a reasonable state of repair. This is assessed by looking at the age of the dwellings and the condition of a range of building components (including walls, roofs, windows, doors, electrics and heating system)

Figure 5 to Figure 6 compare these property condition indicators across the three analysis groups. For wards with over 30% of the stock being privately rented, River ward has the highest level of all hazards (9%). River ward also has the highest levels of disrepair (5%), closely followed by Marine ward (5%). Excess cold levels are highest in Marine and River wards (4%). Compared to the figures for Arun's overall private rented stock, Marine and River wards generally tend to have similar or higher levels of each of the property condition indicators, whereas Hotham ward has similar or lower levels.

Of the wards where 19-30% of the stock is estimated to be private rented, Beach ward has the highest level of hazards (10%), followed by Orchard (9%). Levels of falls hazards are similar across all four wards, with Felpham West having slightly higher levels (5% compared to 4%). Compared to Arun's overall private rented stock, Beach, Orchard and Felpham West wards have higher or similar levels of each of the property condition indicators. Courtwick with Toddington ward has similar or lower levels of each of the property condition indicators when compared to Arun.



Figure 5: Comparison of percentage of private rented dwellings failing the Housing Standards Variables for wards with PRS over 30%

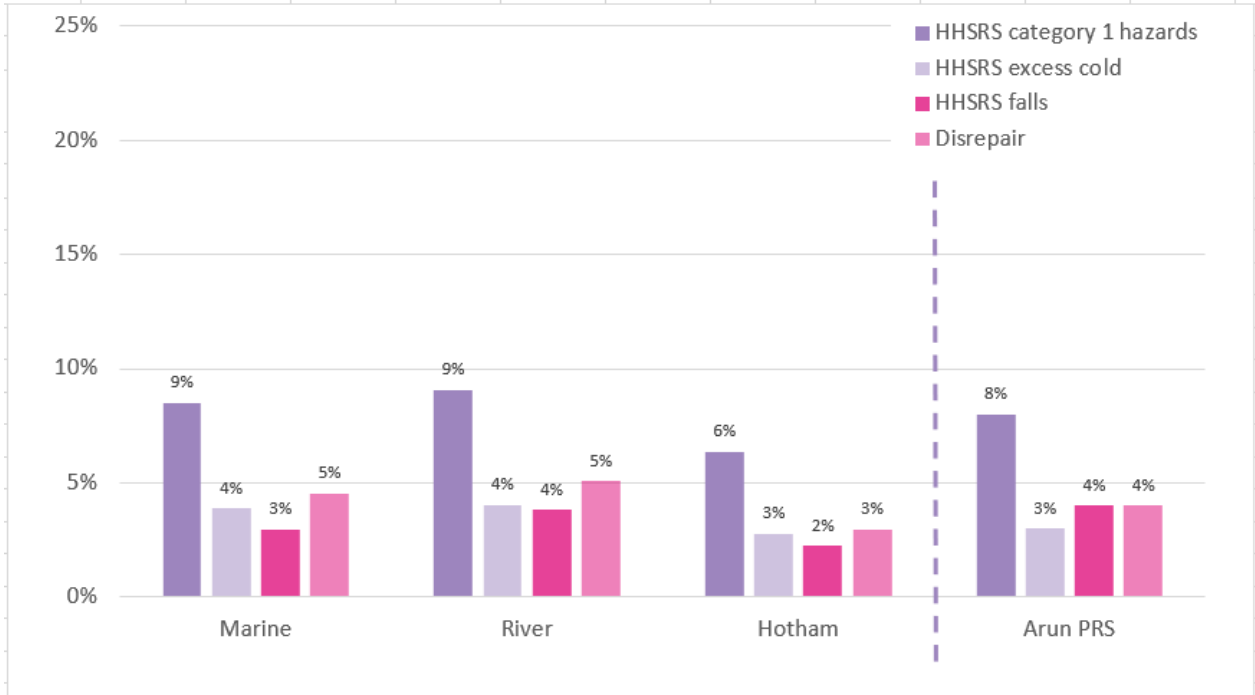
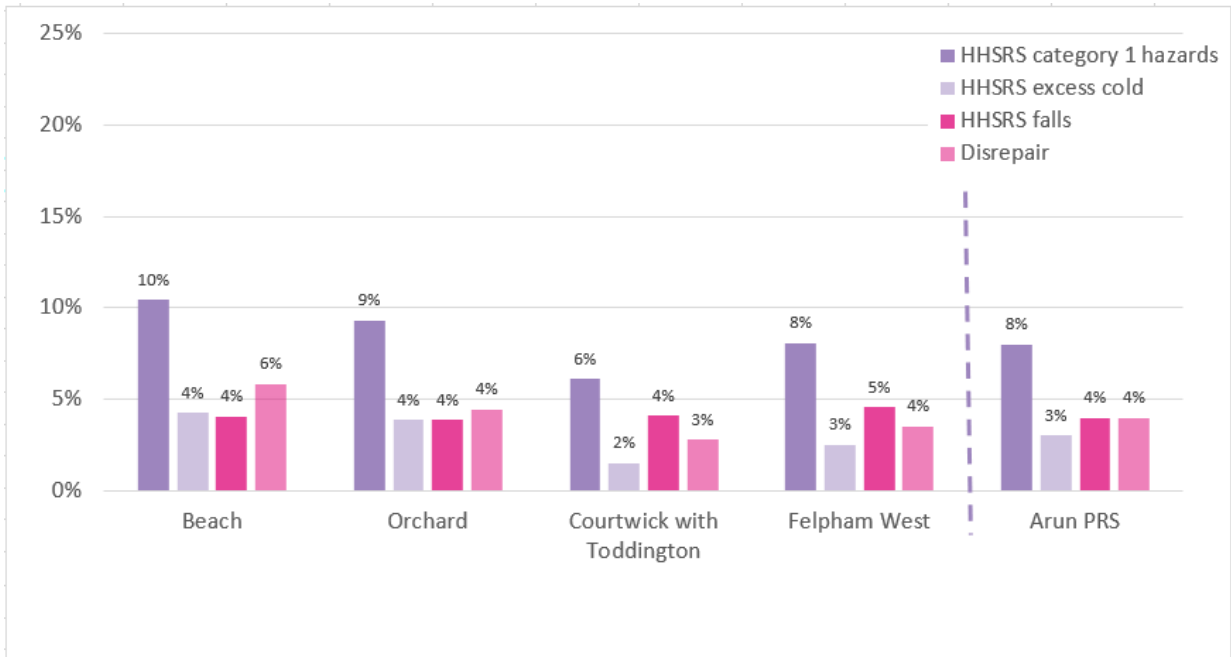


Figure 6: Comparison of percentage of private rented dwellings failing the Housing Standards Variables for wards with PRS 19-30%





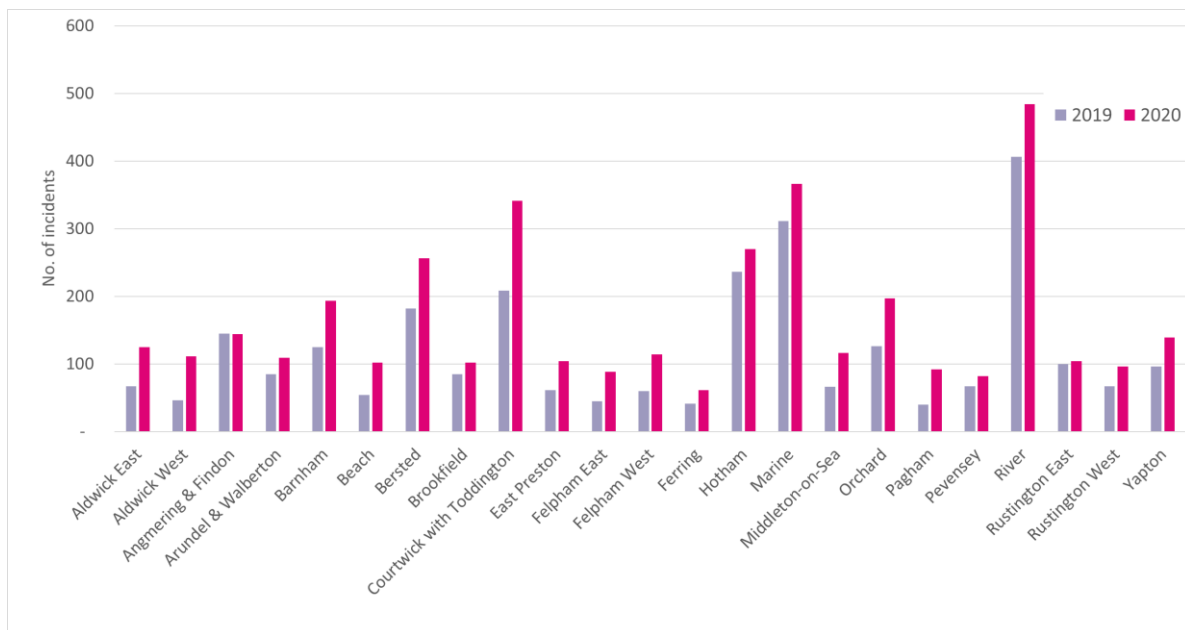
2.2.4 Information on crime - Anti-Social Behaviour (ASB)

The term anti-social behaviour (ASB) covers a range of activities which negatively affect people on a daily basis¹⁸. ASB is defined as “behaviours by a person which causes or is likely to cause harassment, alarm or distress to one or more persons not of the same household as the person” and is classified under 3 headings:

- Personal – ASB is perceived to be targeted at an individual or group rather than the community at large
- Nuisance – ASB is causing trouble, annoyance or suffering to the community at large rather than an individual or group
- Environmental – the incident is not aimed at an individual or group but targets the wider environment e.g. public spaces/buildings

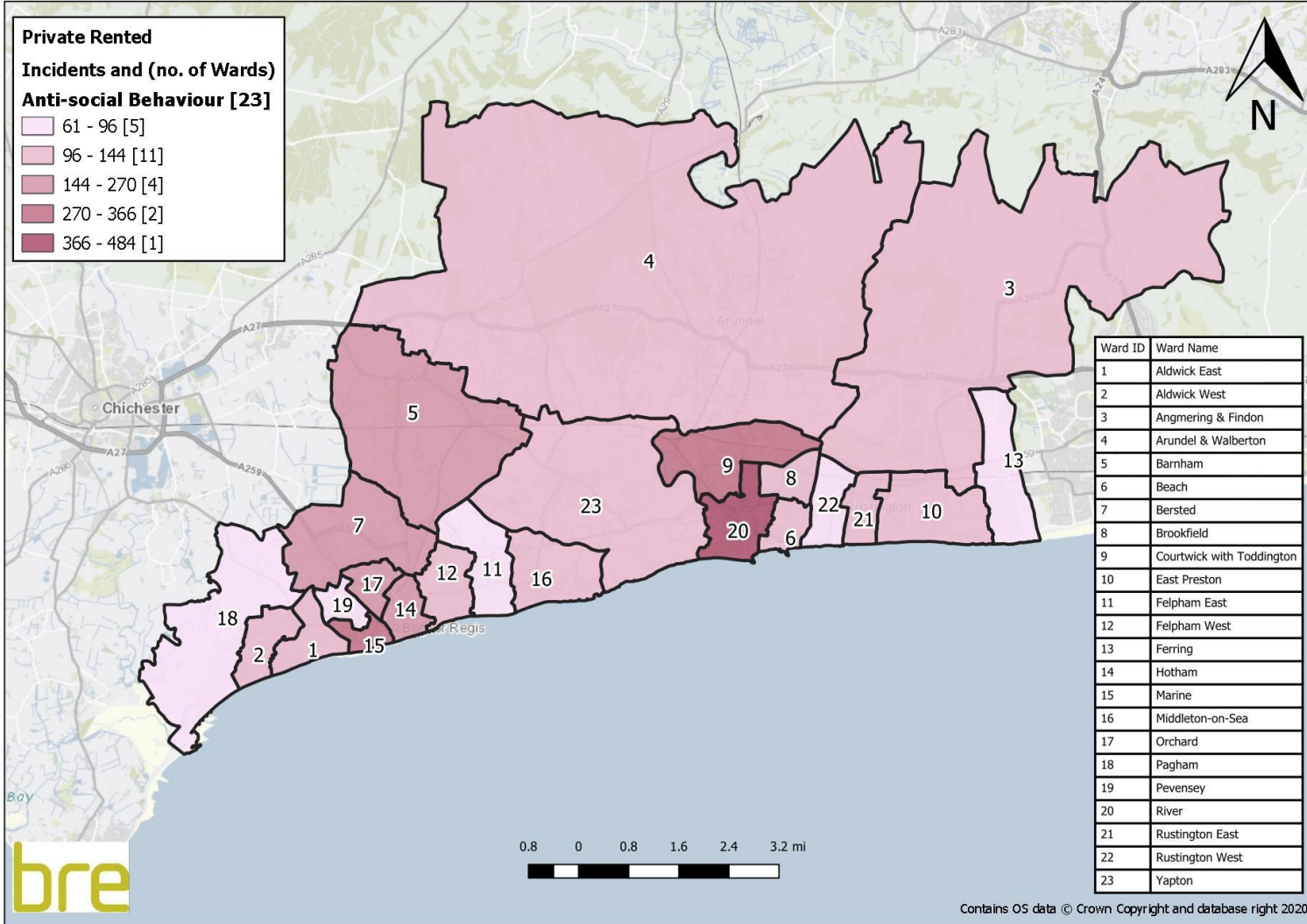
Information was sourced from *data.police.uk* for 2019 and 2020, and this is summarised in **Figure 7** which shows incidents of ASB by ward for both years. In 2019, River ward had the greatest number of reported incidents at 406, followed by Marine ward at 311 and Hotham ward at 236. In 2020, incidents of ASB appear to have increased in all wards; however, the highest levels are again in River ward (484), followed by Marine (366). In 2020, the third highest ASB incidents were in Courtwick with Toddington ward (341), with Hotham ward instead having the fourth highest (270). **Map 8** shows the figures at LSOA level for 2020, indicating higher levels of ASB incidents in the towns of Bognor Regis and Littlehampton. **Map D. 7** shows further detail on the coastal town areas.

Figure 7: Incidences of ASB by ward, 2019 and 2020 (Source: *data.police.uk*)



¹⁸ Antisocial Behaviour Act 2003 & Police Reform and Social Responsibility Act 2011

Map 8: Distribution of ASB by LSOA - 2020 figures (Source: data.police.uk) N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound





2.2.5 Information on deprivation

The 2019 Indices of Multiple Deprivation (IMD)¹⁹ take account of seven “domains” to produce an overall relative measure of deprivation. The domains and their weighting are as follows:

- Income deprivation (22.5%)
- Employment deprivation (22.5%)
- Education, skills and training deprivation (13.5%)
- Health deprivation and disability (13.5%)
- Crime (9.3%)
- Barriers to housing and services (9.3%)
- Living environment deprivation (9.3%)

The indices are produced at Lower Super Output Area (LSOA) and provide statistics on relative deprivation in England by ranking every LSOA from 1 (most deprived) to 32,844 (least deprived). To determine whether an area is deprived or not for the purposes of this study, the 20% most deprived LSOAs have been used.

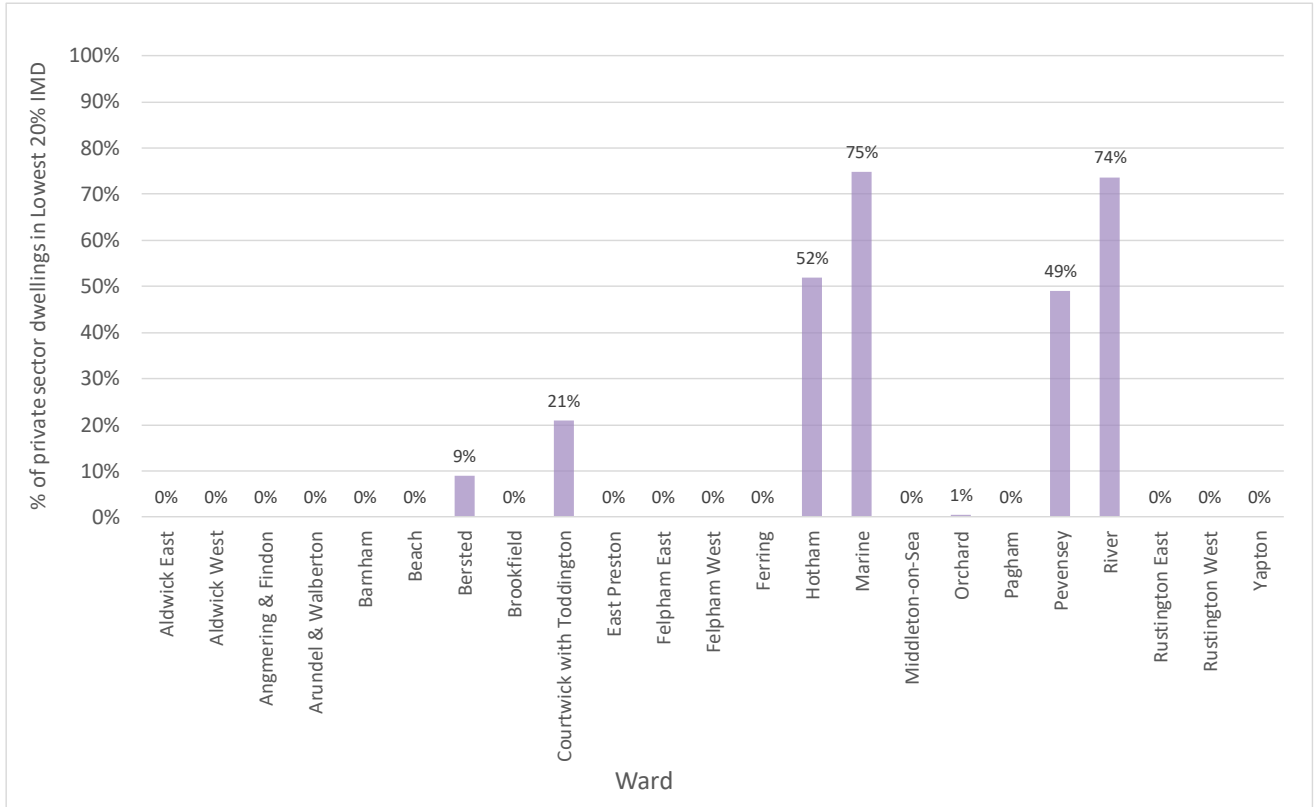
Map 9 shows the distribution of deprivation across Arun at LSOA level with the wards shown over the top, and **Map D. 8** shows this for the coastal areas. The darker colours indicate the most deprived areas, for example, looking at the key there are 7 LSOAs which fall into the 20% most deprived areas in England. Overall, in Arun 27% of privately rented properties are in the 20% most deprived areas.

Figure 8 shows the results of this analysis of IMD data at ward level. In Marine ward 75% of private rented sector dwellings are in the 20% of the most deprived LSOAs in England. For River ward the percentage is similar at 74%. At the other end of the scale, 16 of the 23 wards in Arun have no dwellings in the 20% most deprived LSOAs. Looking at the two wards with the highest levels of deprivation, they also have high proportions of private rented stock - Marine ward has 52.8% private rented stock and River ward has 40.5%.

¹⁹ <https://www.gov.uk/government/statistics/english-indices-of-deprivation-2019>



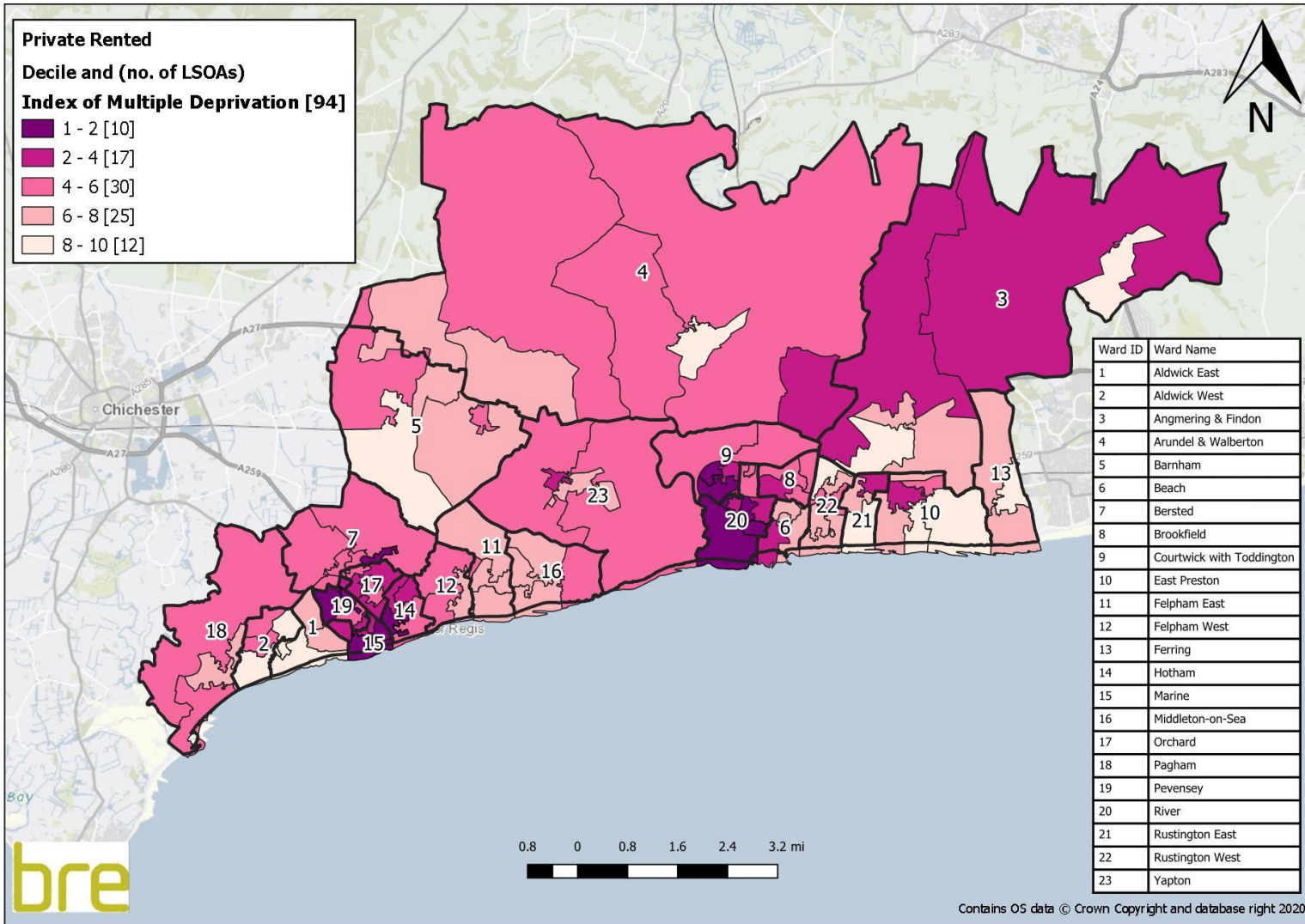
Figure 8: Percentage of privately rented dwellings in each ward in Arun which are in the 20% most deprived areas in England (IMD 2019)



N.B. where no IMD exists on the graph for an area, this is due to there being no properties within the 20% most deprived LSOAs for England



Map 9: Distribution of deprivation in Arun (1 - 2 = the 10% and 20% deciles (i.e. the most deprived), 2 - 4 = the 30% and 40% deciles, etc.) (source: DLUHC, Indices of Deprivation 2019) *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*

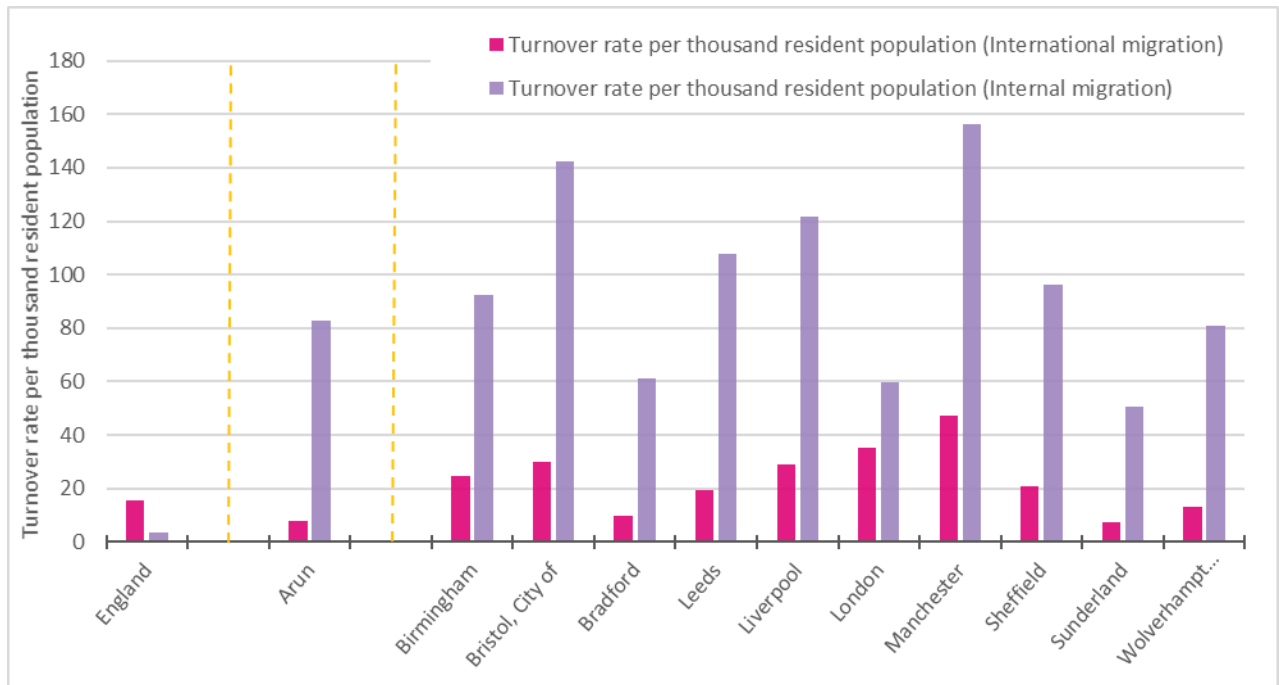




2.2.6 Information on migration

Data on migration is only available at the Council level²⁰, therefore migration figures for Arun have been compared to the remaining 10 largest cities in England and England overall for the latest year available (mid-2018 to mid-2019) – see **Figure 9**. The data uses the long-term²¹ international and internal (within UK) migration component of population change data to calculate the rates for turnover and is therefore split into international migration and internal migration. The data shows that for international migration the greatest turnover rate is in Manchester, with Arun having one of the lowest turnovers of the analysed cities. Looking at internal migration, Arun shows similar levels to Birmingham and Wolverhampton, with Bristol, Liverpool and Manchester having the highest levels.

Figure 9: Comparison of migration figures (international and internal) for Arun, the 10 largest cities in England, and England overall - mid-2019 to mid-2020 (Source: ONS²⁰)



²⁰

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom>

²¹ A person who moves from their country of usual residence for a period of at least 12 months -

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/methodologies/migrationstatisticsfirsttimeuserguideglossaryandlistofproducts>



2.2.7 In-depth analysis on specific areas

Areas with proportions of private rented stock above the national average (19%) were examined more closely. **Table 11** shows the numbers and percentages of dwellings for each of the HHSRS indicators, dwellings in disrepair and the most deprived 20% of LSOAs in England (IMD 2019) by ward. The table is divided into the previously identified two analysis groups (all above the national average of 19% private rented stock), and also provides the figures for the remaining wards for completeness of information.

Looking at the analysis group with over 30% private rented sector stock, Marine and River wards have the highest level of private rented sector category 1 hazards (9%), followed by Hotham ward (6%). Marine and River wards also have the highest levels of excess cold (4%) and disrepair (5%), and River ward has the highest level of falls hazards (4%). All three of the wards with PRS over 30% have the highest levels of properties in the 20% most deprived areas. Marine and River wards also stand out as having the highest levels of ASB of all wards in Arun.

For the analysis group with 19 – 30% private rented stock, Beach ward has the highest level of category 1 hazards at 10%, and disrepair (6%). Felpham West ward has the highest level of falls hazards in the group at 5%, but this is closely followed by the other three wards at 4%. Levels of excess cold are highest in Beach and Orchard wards (4%). Courtwick with Toddington is the only ward in this category to have a significant level of properties in the 20% most deprived areas (21%).

To provide a more detailed picture, the following maps provide information at LSOA level where only LSOAs where the proportion of private rented dwellings is greater than the national average (19%) are shown. **Map 10** shows the levels of HHSRS category 1 hazards in these specific areas. The rest of the map is blank, showing it is not an LSOA with >19% private rented stock. This provides more focus on smaller geographical areas where private rented stock is high and the proportion of hazards is also high. For example, the map shows that the LSOA to the east of Arundel & Walberton ward has private rented stock over 19% as well as 10% – 12% of these properties also having a category 1 hazard. This LSOA, however, is not highlighted in green and therefore is not also in the 20% most deprived LSOAs. The areas which stand out overall are clustered around the towns of Bognor Regis and Littlehampton.

Map 11 to Map 13 show the distributions for excess cold, fall hazards and disrepair across Arun in LSOAs where the proportion of private rented dwellings is greater than the national average. From these maps, it is clear that most of the areas which stand out are similar to those for category 1 hazards.

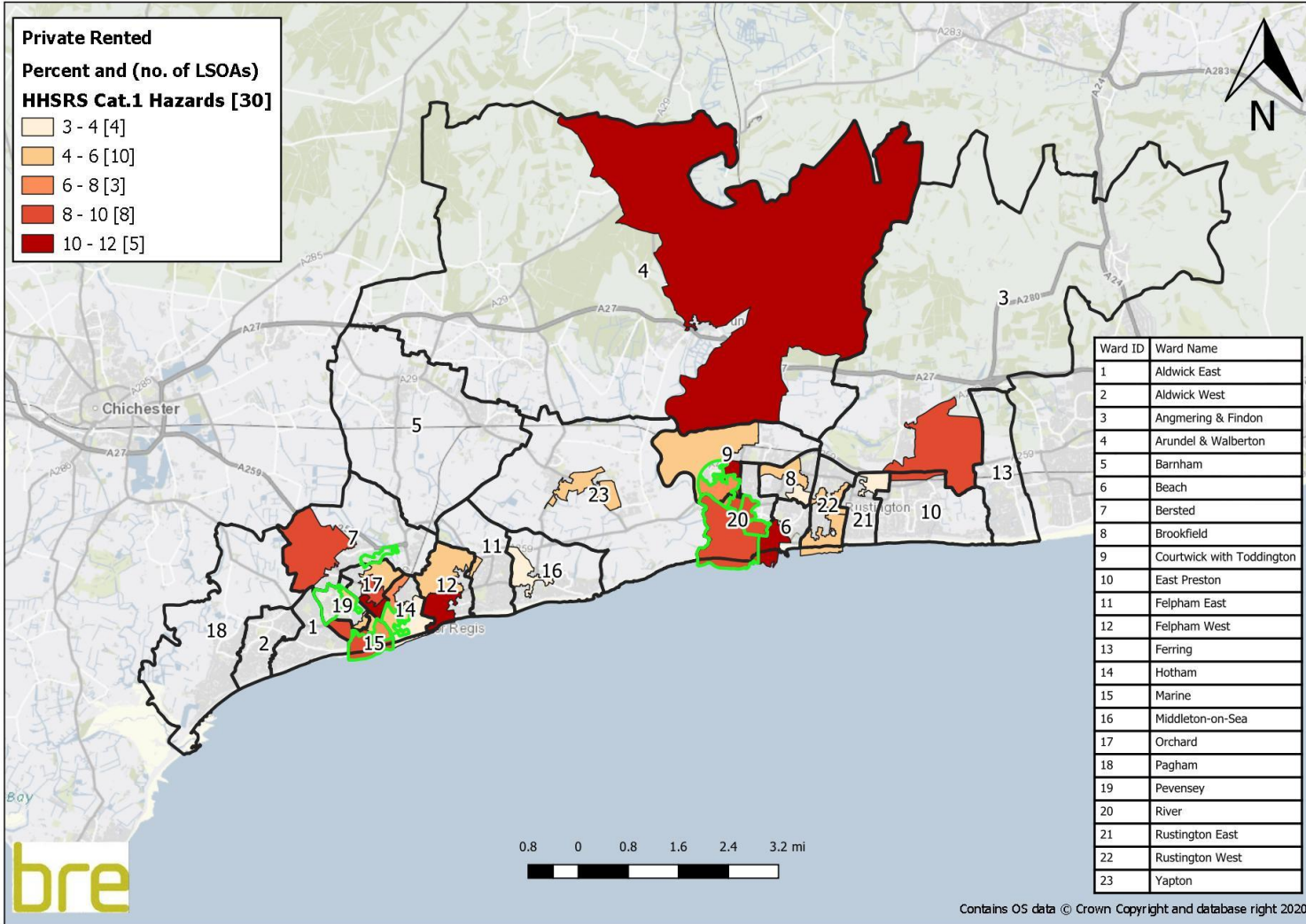
Closer detail on LSOAs in the coastal regions of the Council can be found in **Map D. 9 to Map D. 12** in the Appendix.



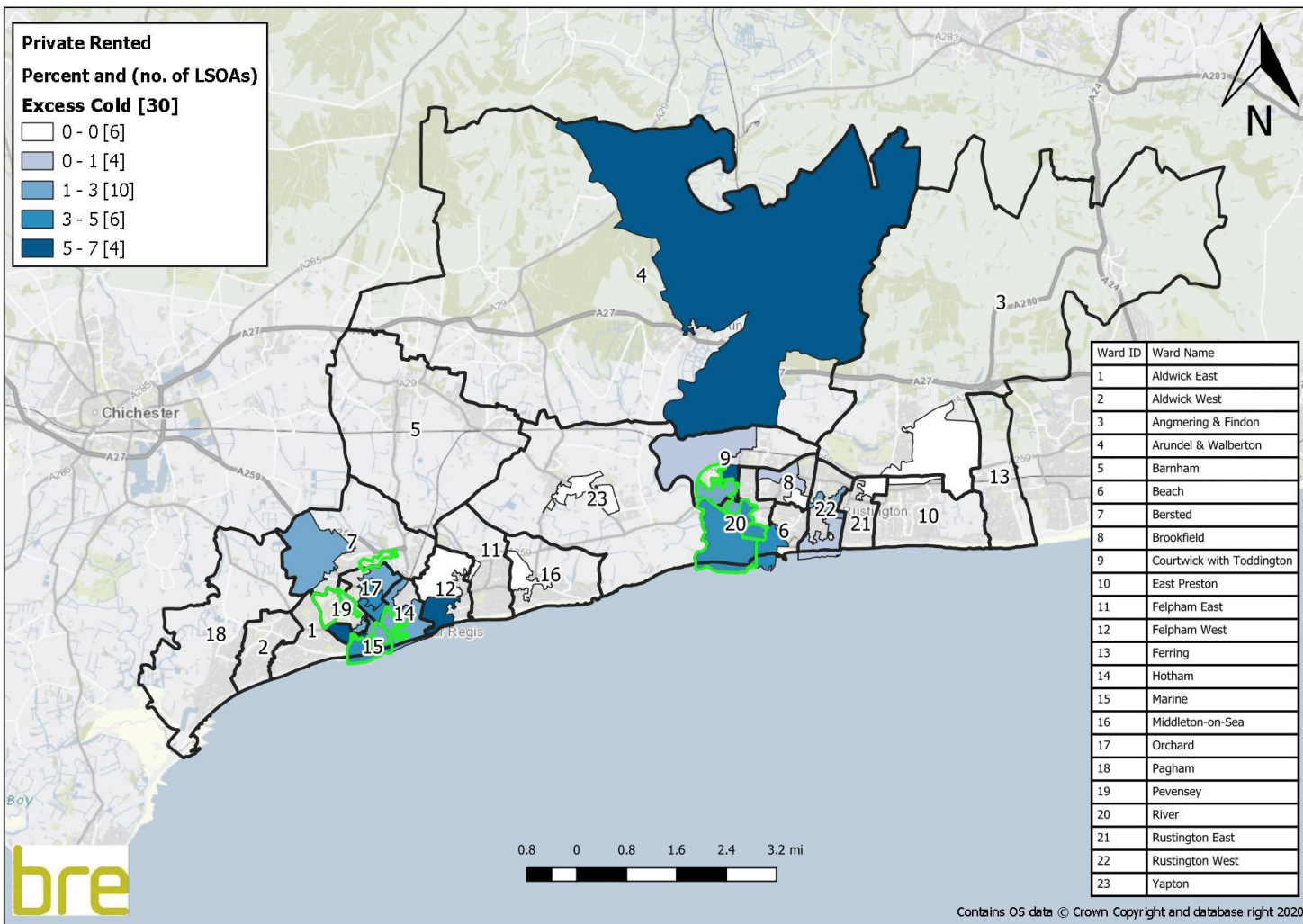
Table 11: Number and percentage of dwellings for each of the HHSRS indicators, disrepair and the most deprived 20% of LSOAs in England (IMD 2019) by ward – private rented stock split into the two analysis groups with over 19% private rented stock (remaining wards included for completeness)

Ward	No. of dwellings - private rented stock	HHSRS category 1 hazards			Disrepair	Index of Multiple Deprivation (20%)
		All hazards	Excess cold	Falls hazards		
Marine	1,845	157 (9%)	72 (4%)	55 (3%)	84 (5%)	1,382 (75%)
River	1,907	173 (9%)	77 (4%)	73 (4%)	97 (5%)	1,405 (74%)
Hotham	1,147	73 (6%)	32 (3%)	26 (2%)	34 (3%)	596 (52%)
Beach	564	59 (10%)	24 (4%)	23 (4%)	33 (6%)	0 (0%)
Orchard	697	65 (9%)	27 (4%)	27 (4%)	31 (4%)	4 (1%)
Courtwick with Toddington	996	61 (6%)	15 (2%)	41 (4%)	28 (3%)	208 (21%)
Felpham West	594	48 (8%)	15 (3%)	27 (5%)	21 (4%)	0 (0%)
Brookfield	489	25 (5%)	4 (1%)	17 (3%)	7 (1%)	0 (0%)
Pevensey	426	25 (6%)	2 (0%)	16 (4%)	14 (3%)	209 (49%)
Yapton	432	29 (7%)	8 (2%)	17 (4%)	11 (3%)	0 (0%)
Rustington West	675	44 (7%)	14 (2%)	22 (3%)	17 (3%)	0 (0%)
Bersted	623	47 (8%)	12 (2%)	30 (5%)	19 (3%)	56 (9%)
Arundel & Walberton	579	75 (13%)	43 (7%)	27 (5%)	25 (4%)	0 (0%)
Barnham	506	36 (7%)	14 (3%)	19 (4%)	14 (3%)	0 (0%)
Rustington East	379	36 (9%)	21 (6%)	11 (3%)	8 (2%)	0 (0%)
Middleton-on-Sea	355	18 (5%)	6 (2%)	9 (3%)	8 (2%)	0 (0%)
Angmering & Findon	583	51 (9%)	19 (3%)	25 (4%)	18 (3%)	0 (0%)
Felpham East	286	20 (7%)	5 (2%)	14 (5%)	9 (3%)	0 (0%)
East Preston	399	27 (7%)	9 (2%)	15 (4%)	12 (3%)	0 (0%)
Aldwick East	250	13 (5%)	3 (1%)	7 (3%)	6 (2%)	0 (0%)
Aldwick West	262	21 (8%)	7 (3%)	11 (4%)	10 (4%)	0 (0%)
Pagham	247	15 (6%)	5 (2%)	10 (4%)	7 (3%)	0 (0%)
Ferring	182	11 (6%)	4 (2%)	6 (3%)	5 (3%)	0 (0%)

Map 10: Distribution of category 1 HHSRS hazards where the proportion of private rented stock is above the national average (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound

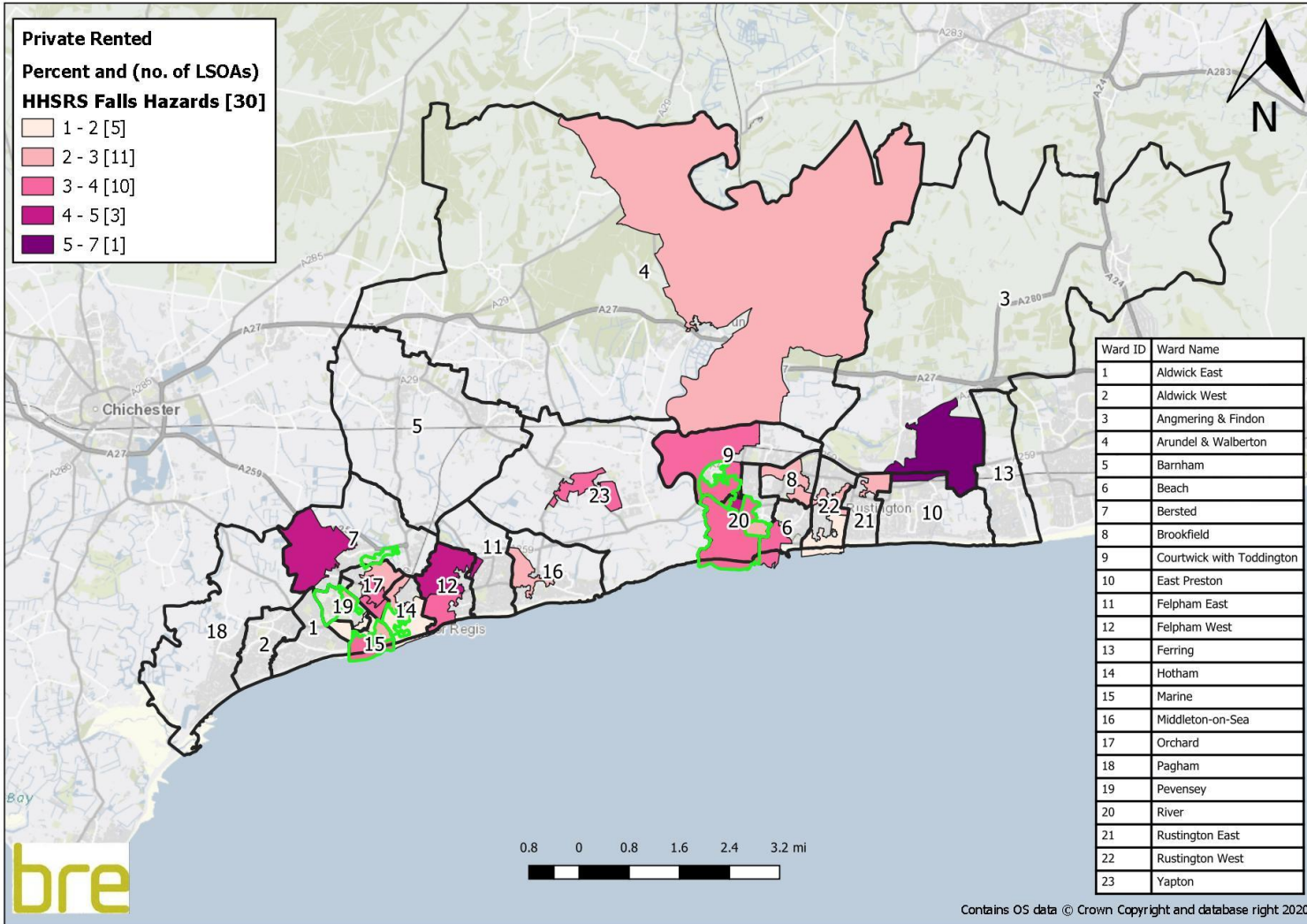


Map 11: Distribution of excess cold hazards where the proportion of private rented stock is above the national average (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound

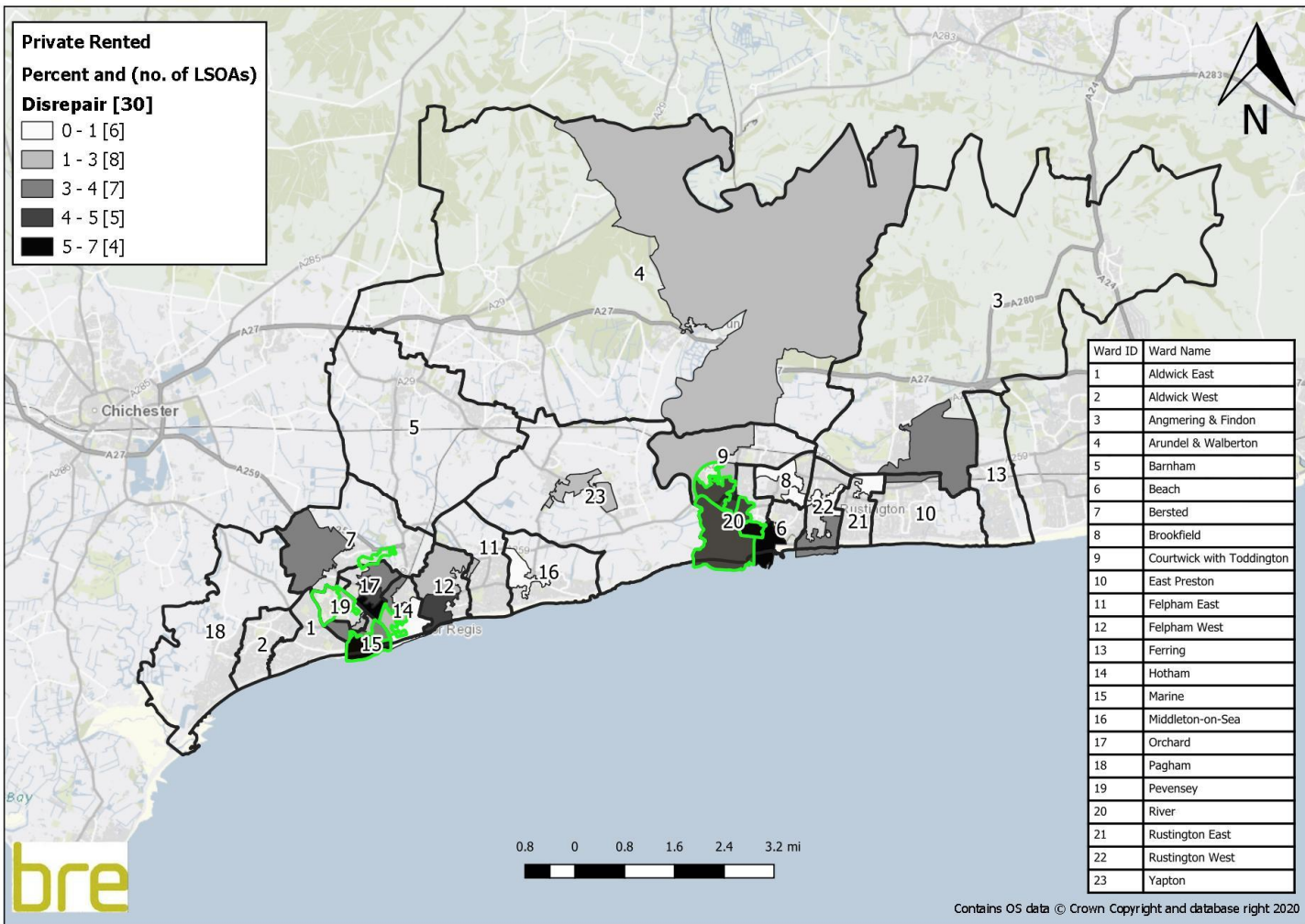


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Map 12: Distribution of fall hazards where the proportion of private rented stock is above the national average (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound



Map 13: Distribution of dwellings in disrepair where the proportion of private rented stock is above the national average (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound



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3 Conclusion

3.1 Conclusion

Arun District Council previously commissioned BRE to undertake a series of modelling exercises on their housing stock to provide an integrated housing stock condition database, making use of available local data sources (Local Land and Property Gazetteer (LLPG), tenure and Houses in Multiple Occupation (HMO) data) plus the EPC data which have been integrated into BRE's standard Housing Stock Condition Database (HSCD).

Arun District Council also requested identification and analysis of potential HMOs (including mandatory licensable HMOs) and their condition; providing an assessment on buildings with potential for being Section 257 HMOs; analysis of private rented stock focussing on the selective licensing criteria including property condition migration, ASB, and deprivation.

Such information will facilitate the decision making process for targeting resources to improve the condition of housing and to prevent ill health resulting from poor housing conditions. Furthermore, it will assist in determining if there is evidence for further regulation of the private rented sector, such as establishing additional HMO Licensing, Article 4 Direction under the Town and Country Planning Act 1990 or Selective Licensing.

There are specific areas within the wards identified which have higher levels of private rented stock and deprivation and disrepair which could be considered for targeted interventions. Such interventions might include targeting landlords of dwellings not meeting minimum energy efficiency standards, discretionary licensing schemes or consideration of an Article 4 Direction.

3.2 HMO analysis

The Council provided lists of addresses for HMOs subject to mandatory licensing (370 dwellings, 275 matched). Based on the matched data, there is an estimated total of 1,396 HMOs in Arun, with 391 being licensable.

Marine ward has the highest number of HMOs (193 HMOs, 10% of private rented stock in that ward), followed by River ward (177 HMOs, 9%) and Hotham ward (156 HMOs, 14%).

Under the Section 257 HMO criteria there are a total of 636 buildings which have the potential to be Section 257 HMOs. The wards with the highest number of Section 257 HMOs are Arundel & Walberton (82) and River (81). For Arundel & Walberton, this is a particularly high proportion of the private rented stock for the ward at 14%. Felpham West also has a high number of Section 257 HMOs (44).

As detailed above, the highest numbers of HMOs were identified in Marine, River, and Hotham wards. The HMOs in these wards also stand out as having generally higher levels of category 1 hazards than the average for Arun: Marine (20%), River (11%), Hotham (15%). These are far higher levels of hazards than the average of 8% for Arun's private rented stock. The levels of disrepair in the HMOs in these wards are similar to the Arun's private rented stock average of 4%. Orchard ward should also be noted for its high number of HMOs (143) and the prevalence of category 1 hazards in these (10%). Whilst Rustington East ward was not identified as having a large number of HMOs (37), it is likely that those which it does have are in poor condition, with 38% being identified with category 1 hazards.

As explored in **Section 2.1.3**, wards with high levels of HMOs and with estimated high proportions of disrepair or category 1 hazards may be a starting point for consideration of schemes to target improvements, such as Additional Licensing schemes or Article 4 Direction.



3.3 Private rented sector analysis

Overall, the percentage of dwellings in the private rented sector across Arun is 19% which is comparable to the national average of 19%. Of the 23 wards in Arun, 7 have a percentage of private rented sector dwellings greater than the national average, in particular Marine (52.8%), River (40.5%) and Hotham (39.2%). Other wards where the proportion of private rented stock is higher than the England national average of 19% are: Orchard; Beach; Courtwick with Toddington; and Felpham West. These wards are all clustered around the towns of Bognor Regis and Littlehampton.

Of the wards within Arun with over 30% private rented stock, Marine and River wards have the highest levels of hazards and disrepair. Compared to Arun's overall private rented stock, all three of these wards generally tend to perform worse for each of the property condition indicators.

Wards which fall into the category of 19-30% private rented stock also tend to have slightly higher levels of category 1 hazards and disrepair than Arun's private rented stock overall. Courtwick with Toddington ward stands out as having the highest level of deprivation in this group at 21%.

Levels of deprivation are greatest in Marine ward where 75% of private rented dwellings are located in the 20% most deprived LSOAs in England, but this is closely followed by River ward where there are 74%, and 52% in Hotham ward. These are all notably higher than the figure for Arun's private rented stock as a whole (27%).

ASB incidents were highest for River and Marine wards both in 2019 (406, 311) and in 2020 (484, 366). Courtwick with Toddington ward is also worth highlighting due to the large increase in ASB incidents between 2019 (208) and 2020 (341).

Table 12 summarises these criteria considered at ward level, for each of the wards with greater than 19% private rented stock.

Table 12: Wards with over 19% private rented stock split into the two analysis groups indicating where the ward has higher levels of each of the other conditions; for category 1 hazards and disrepair, those ticked are higher than the PRS overall in Arun; for IMD, those ticked are higher than the overall figure for the PRS in Arun and for ASB, those ticked are higher than the average for Arun

Ward	% Private Rented Stock >19%	HHSRS category 1 hazards	Disrepair	Index of Multiple Deprivation (20%)	Anti-Social Behaviour
Marine	✓ (52.8%)	✓ (9%)	✓ (5%)	✓ (75%)	✓ 484
River	✓ (40.5%)	✓ (9%)	✓ (5%)	✓ (74%)	✓ 366
Hotham	✓ (39.2%)			✓ (52%)	✓ 270
Beach	✓ (24.1%)	✓ (10%)	✓ (6%)		
Orchard	✓ (24.1%)	✓ (9%)			
Courtwick with Toddington	✓ (23.3%)			✓ (21%)	✓ 341
Felpham West	✓ (21.0%)				



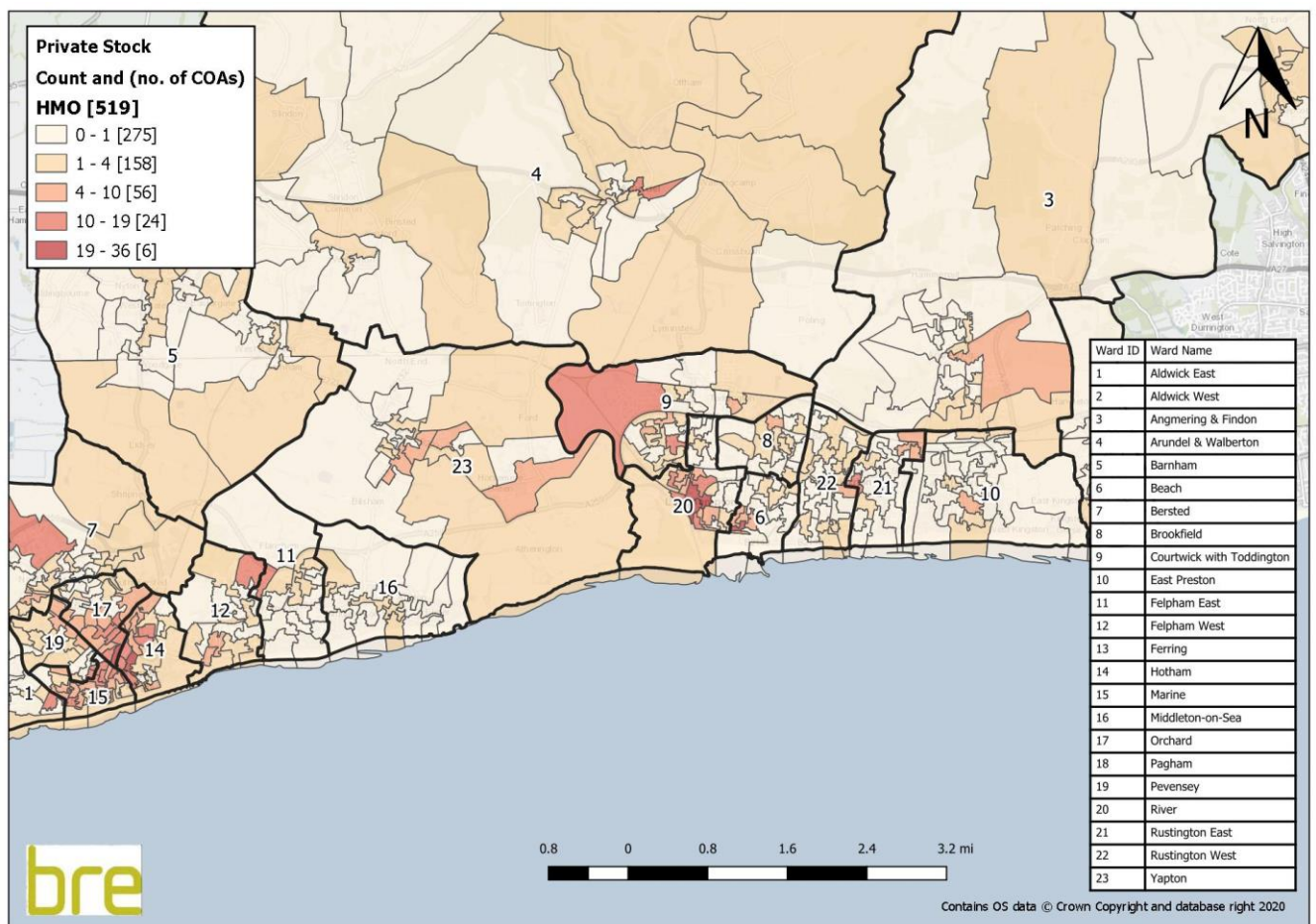
These wards are clustered around the major towns in Arun of Littlehampton and Bognor Regis. The maps provided in **Section 2.2.7** provide detail at a lower geographical area to show areas of potential focus. In the Littlehampton area, LSOAs to the west of River ward and south of Courtwick with Toddington ward have both high levels of deprivation and category 1 hazards, making them a potential candidate for Selective Licensing schemes. For Bognor Regis, LSOAs across Marine ward, and to the west of Hotham ward rank highly in both levels of deprivation and category 1 hazards. These areas could be considered for targeted interventions which may include targeting landlords of dwellings not meeting minimum energy efficiency standards, tapping into appropriate funding streams such as Sustainable Warmth or ECO, or discretionary licensing schemes.



Appendix A Additional Maps

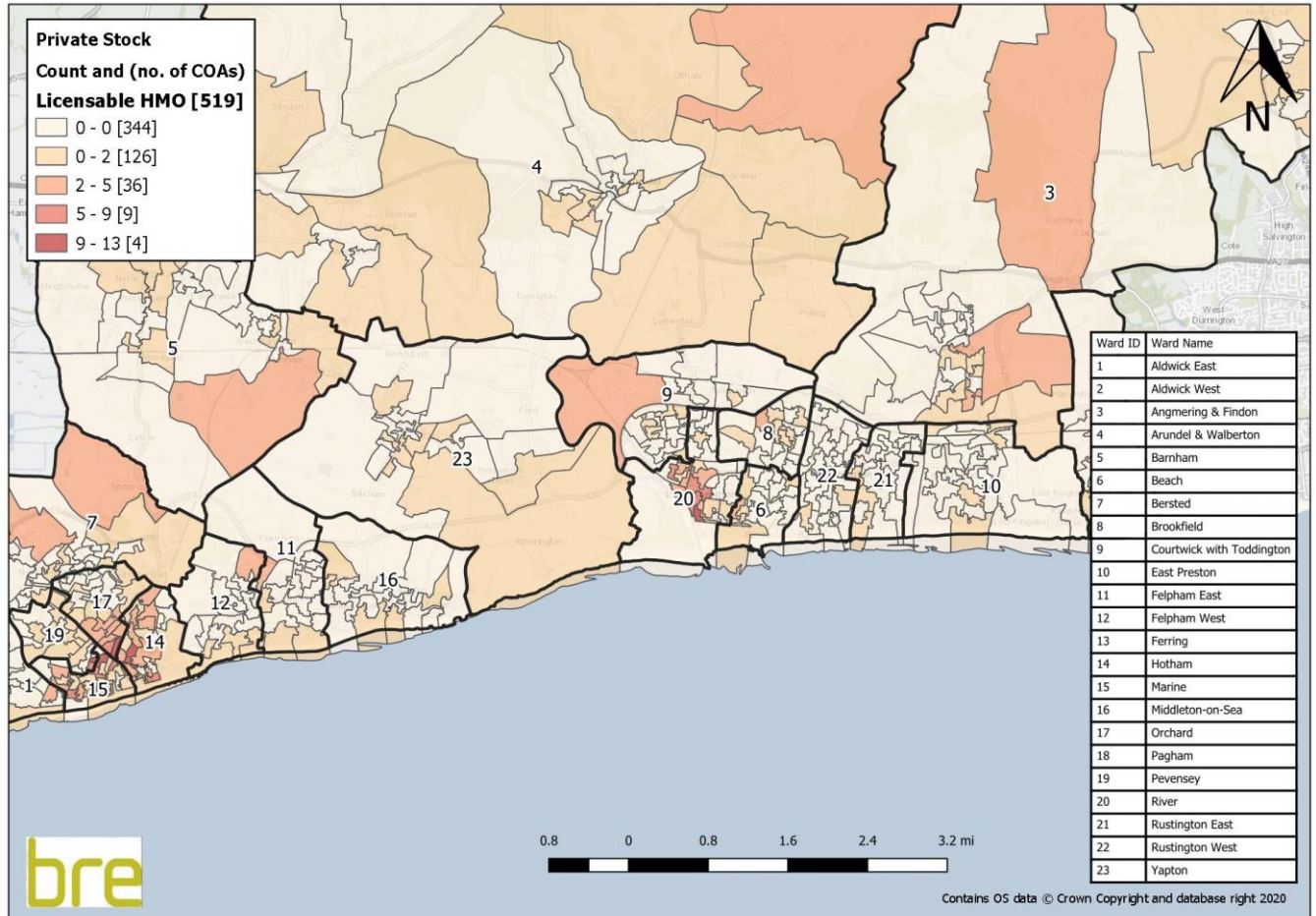
This Appendix provides close up maps for each variable, focussing in on the more built up urban areas of on the coast. These maps show the clear urban – rural divide in many of the Housing Standards Variables. The larger maps included above in the report do not always allow for the appreciation that smaller and denser COAs in urban areas are very different in their hazards to the surrounding rural COAs which are larger and are immediately more eye-catching.

Map D. 1: Count of HMOs in coastal areas *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*



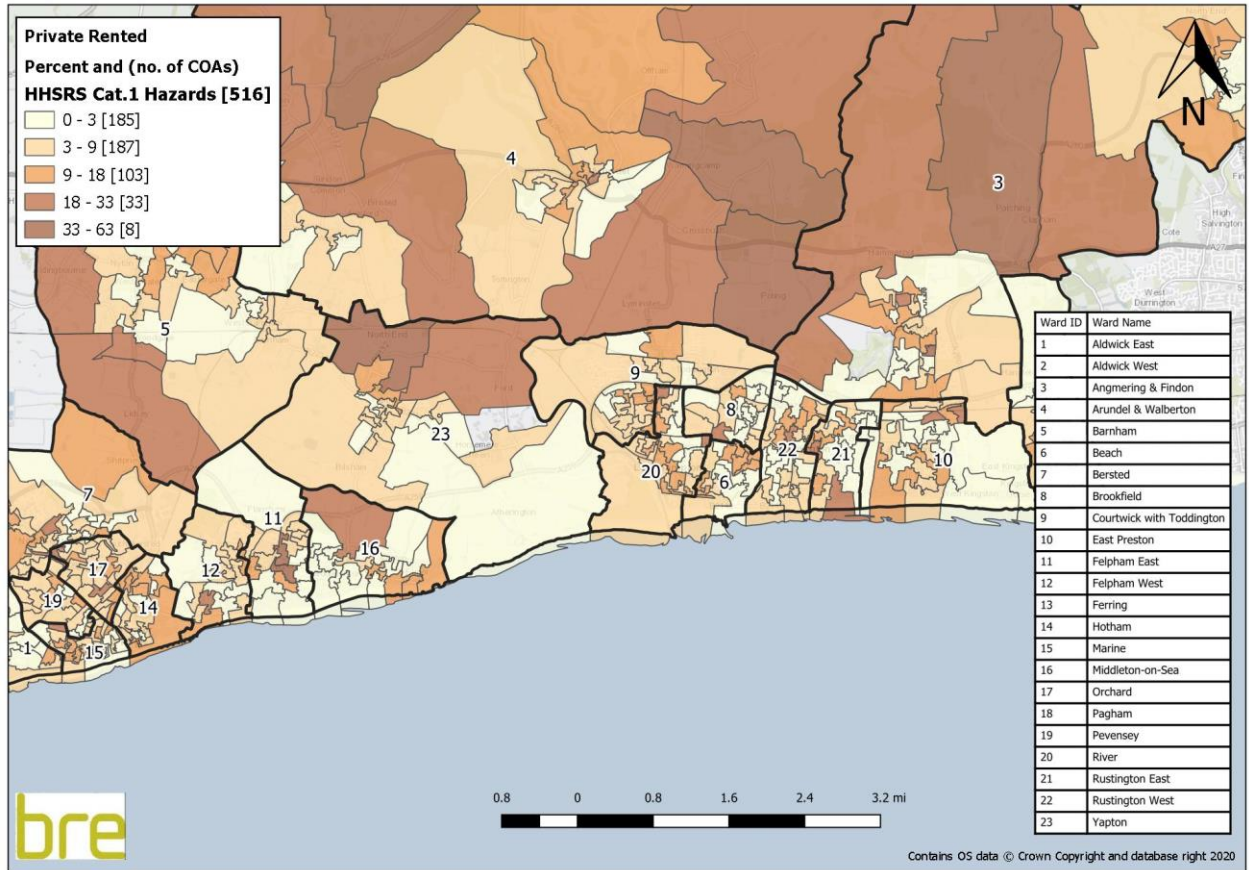


Map D. 2: Count of mandatory licensable HMOs in coastal areas *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound*



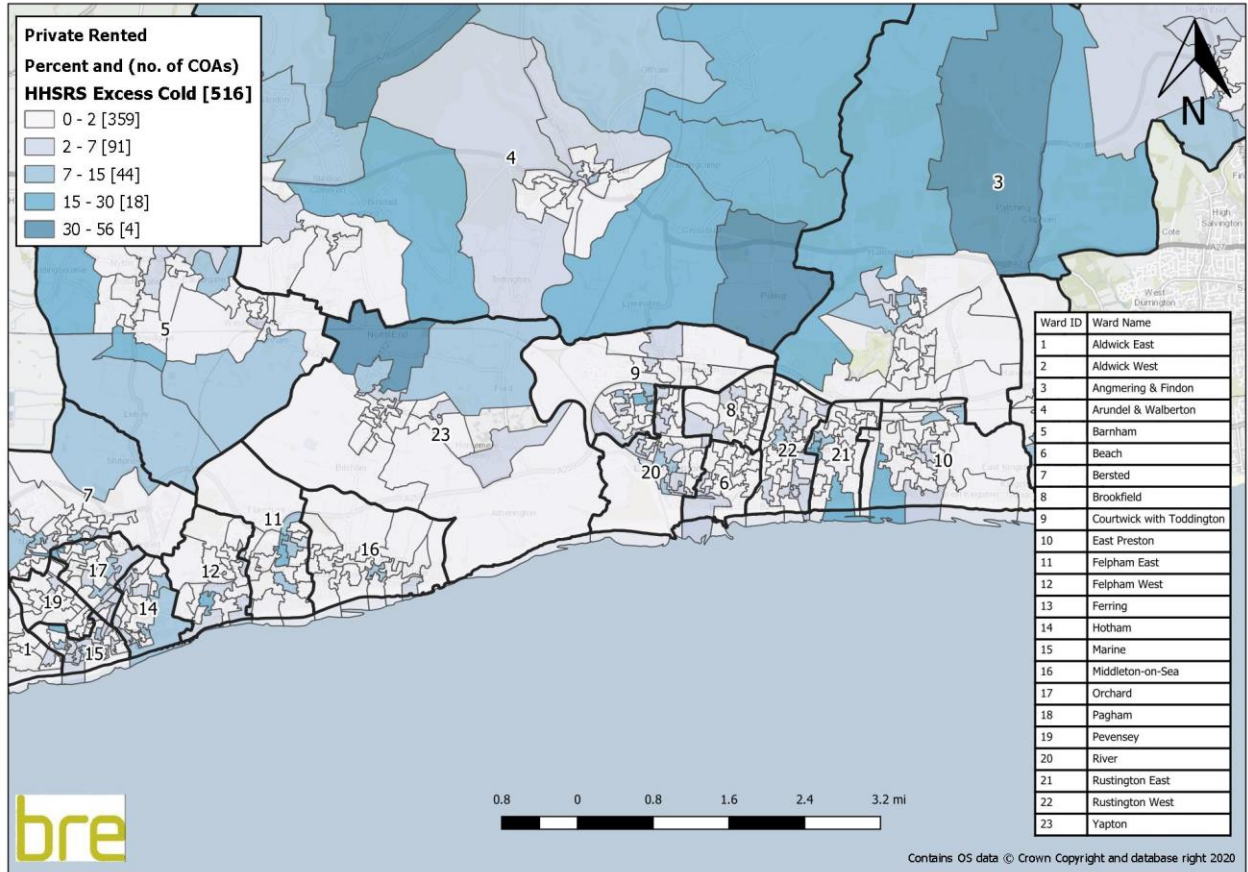


Map D. 3 Percentage of private rented sector dwellings in Arun with the presence of a HHSRS category 1 hazard in coastal areas *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)



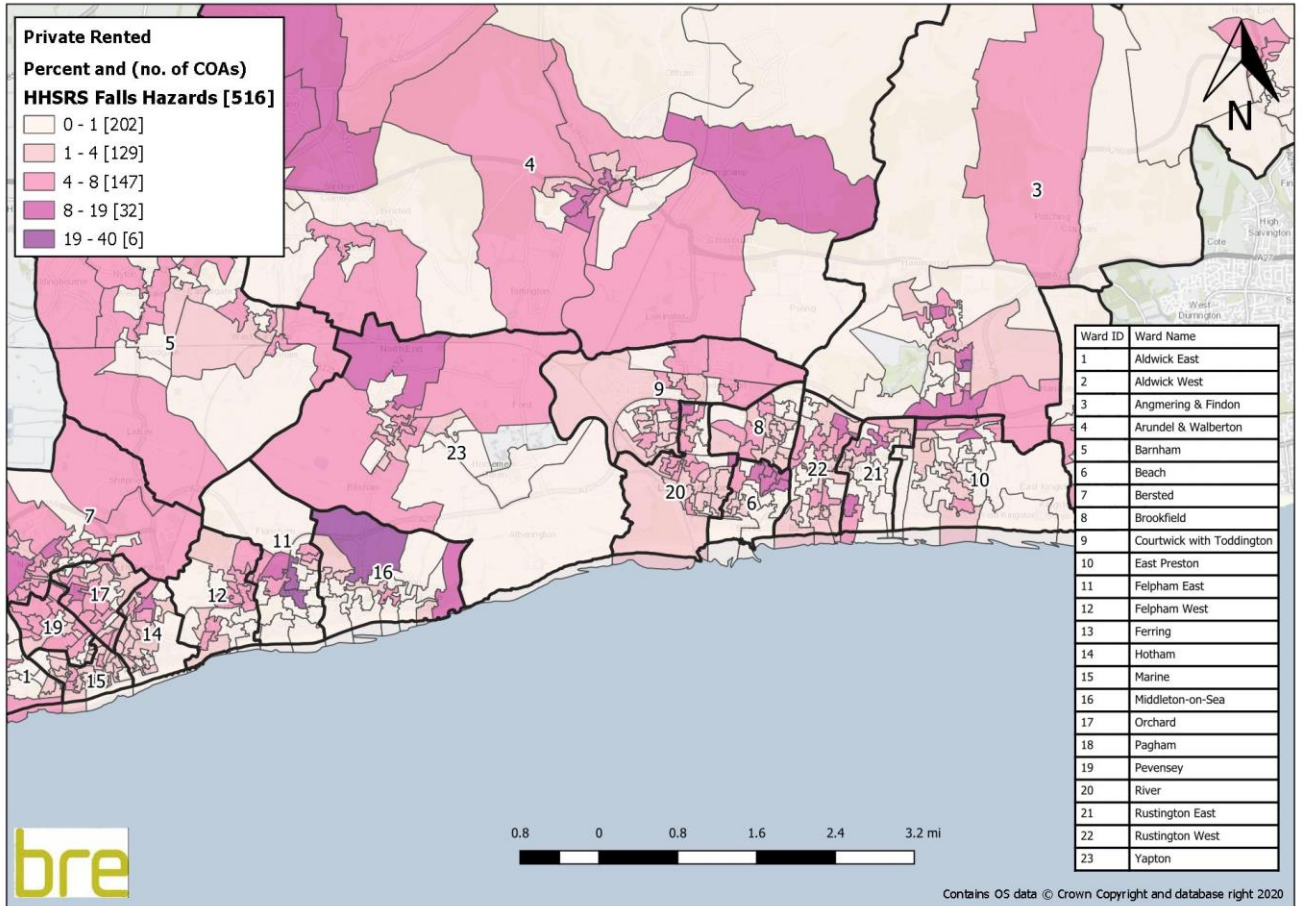


Map D. 4: Percentage of private rented sector dwellings in Arun with the presence of an excess cold in coastal areas *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)



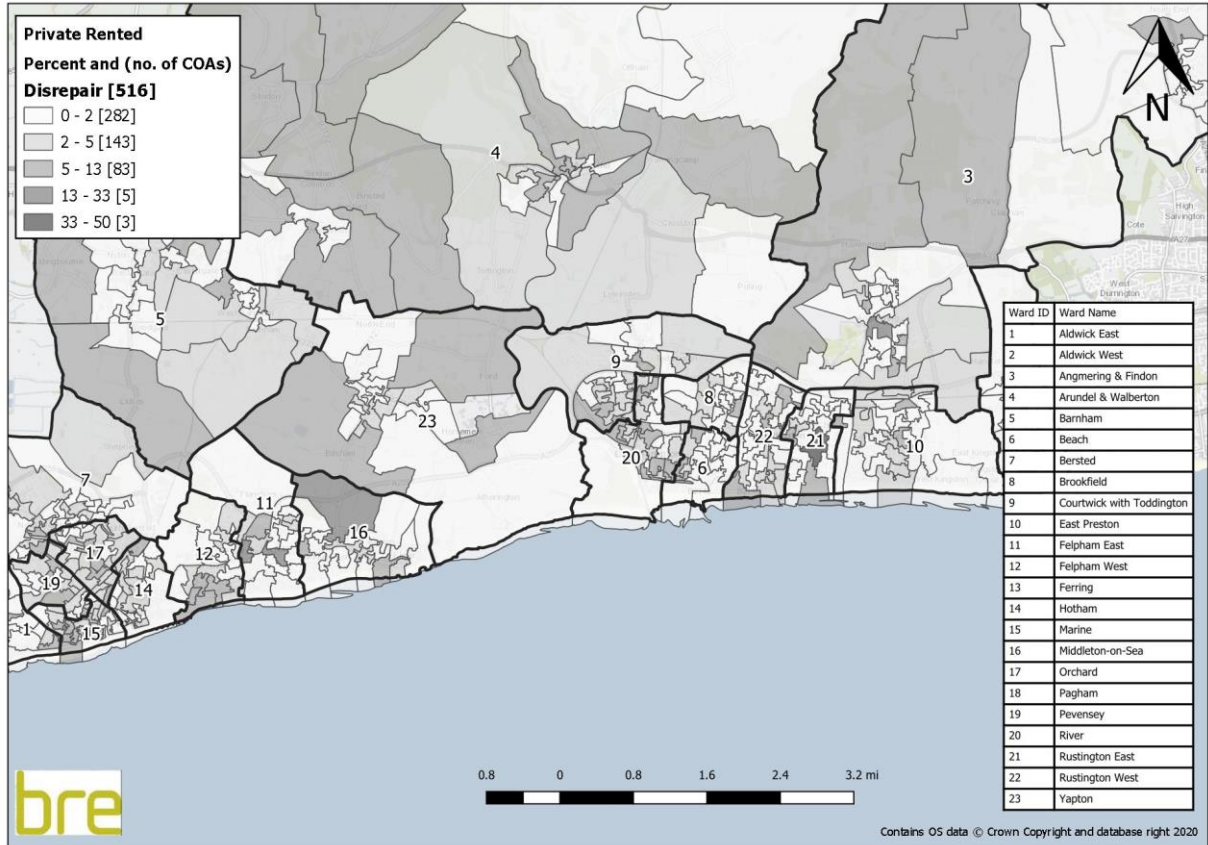


Map D. 5: Percentage of private rented sector dwellings in Arun with the presence of falls hazards in coastal areas *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)



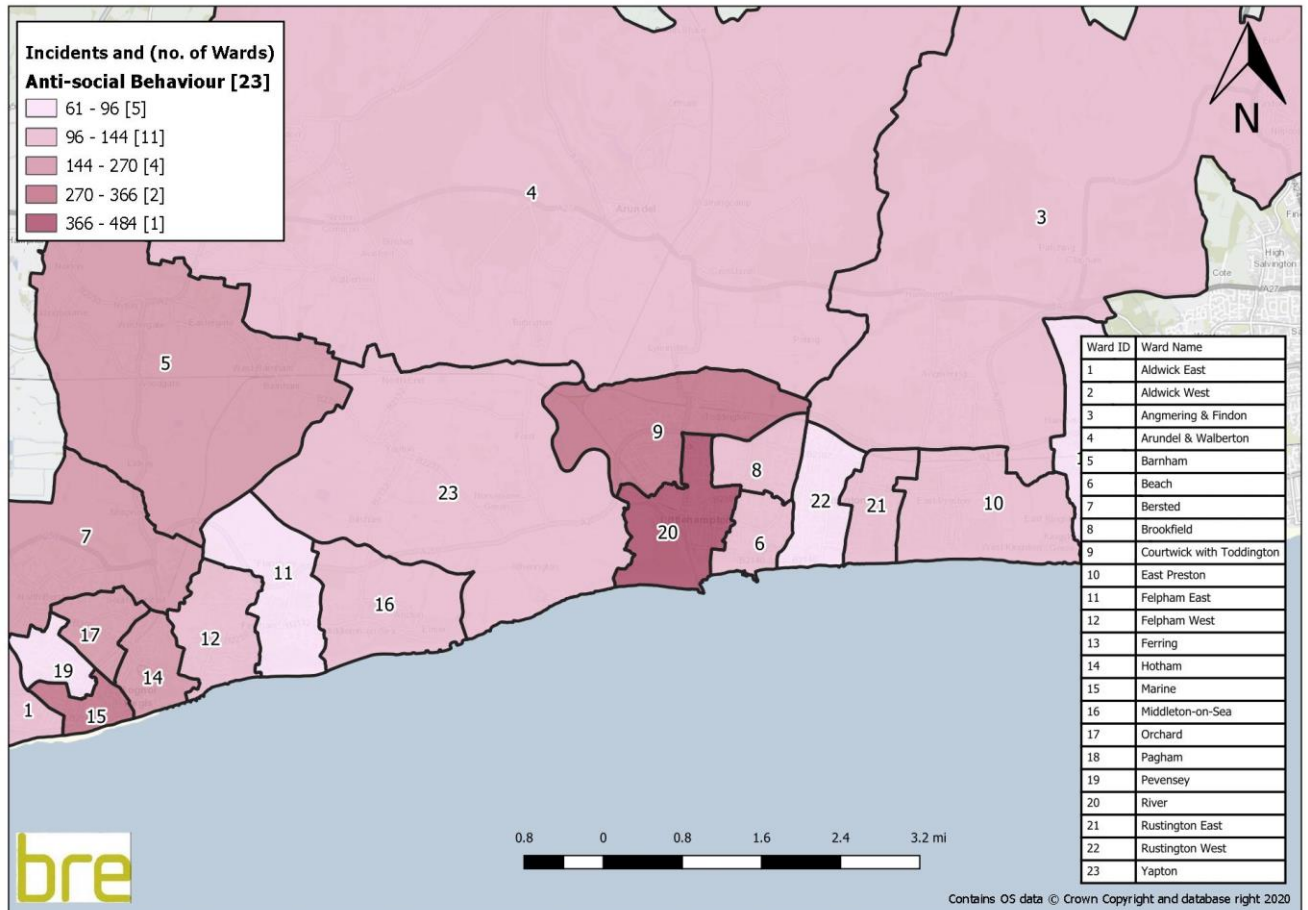


Map D. 6: Percentage of private rented sector dwellings in Arun in disrepair in coastal areas *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)





Map D. 7: Distribution of ASB by LSOA - 2020 figures in coastal areas (Source: data.police.uk) *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)

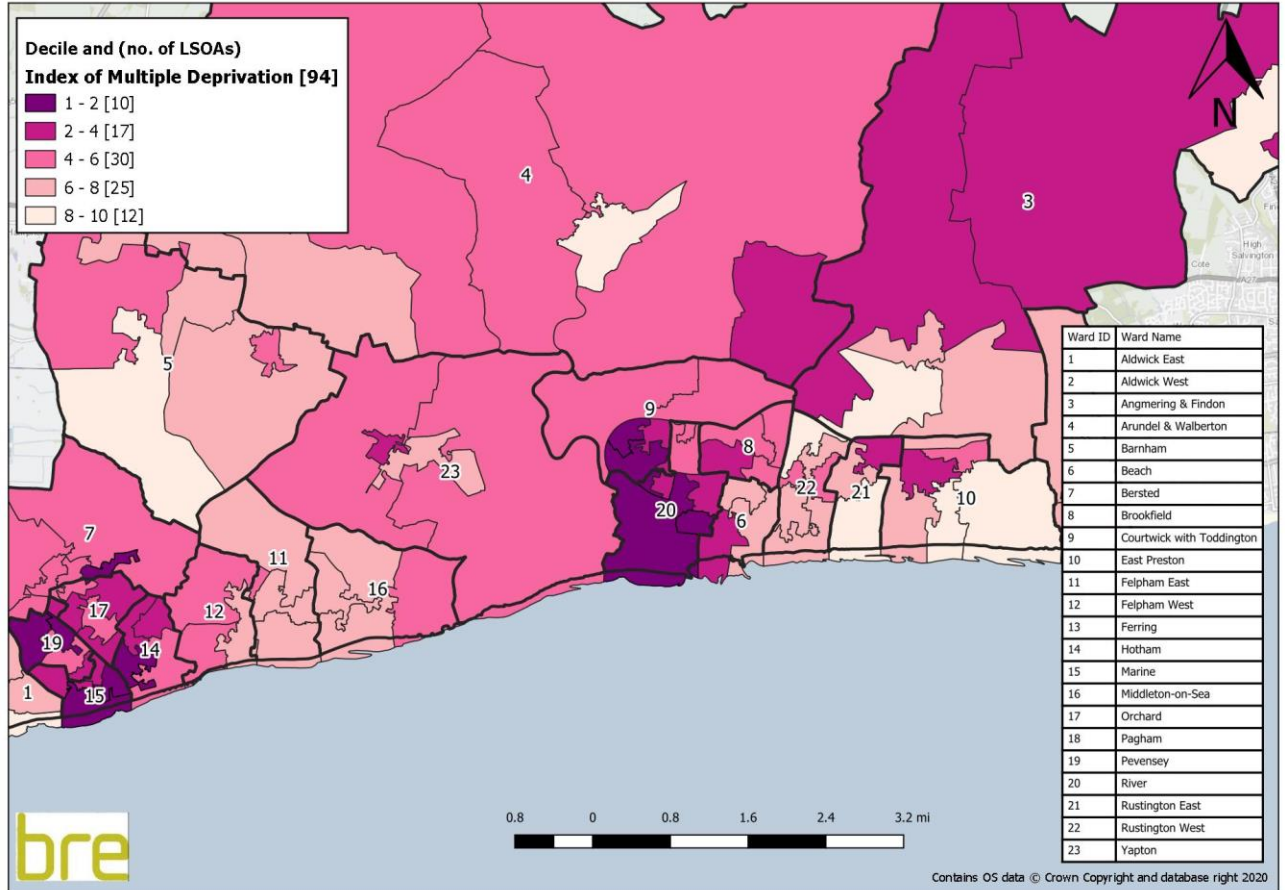




Map D. 8: Distribution of deprivation in Arun (1 - 2 = the 10% and 20% deciles in coastal areas (i.e. the most deprived), 2 - 4 = the 30% and 40% deciles, etc.) (source: DLUHC, Indices of Deprivation 2019)

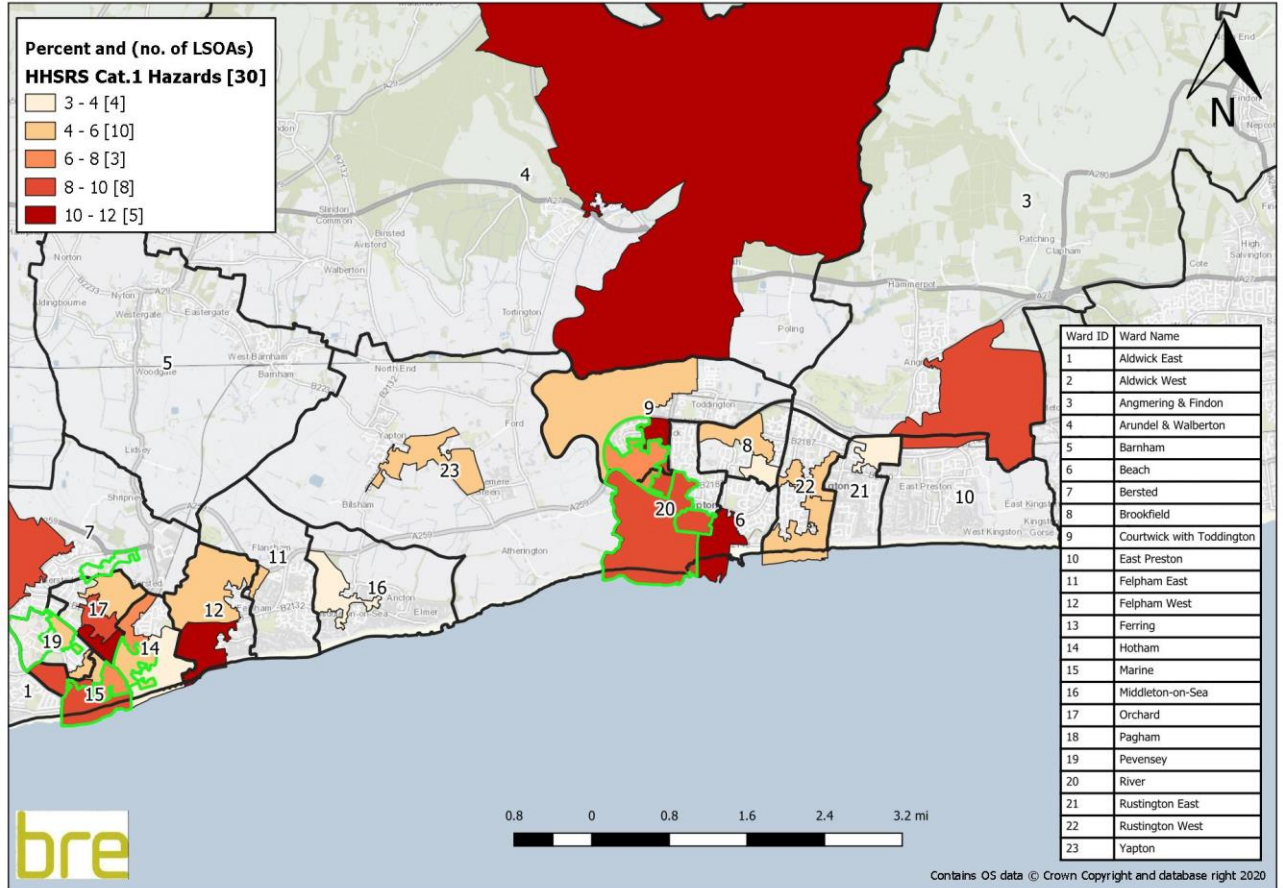
N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound

[Return to main report](#)



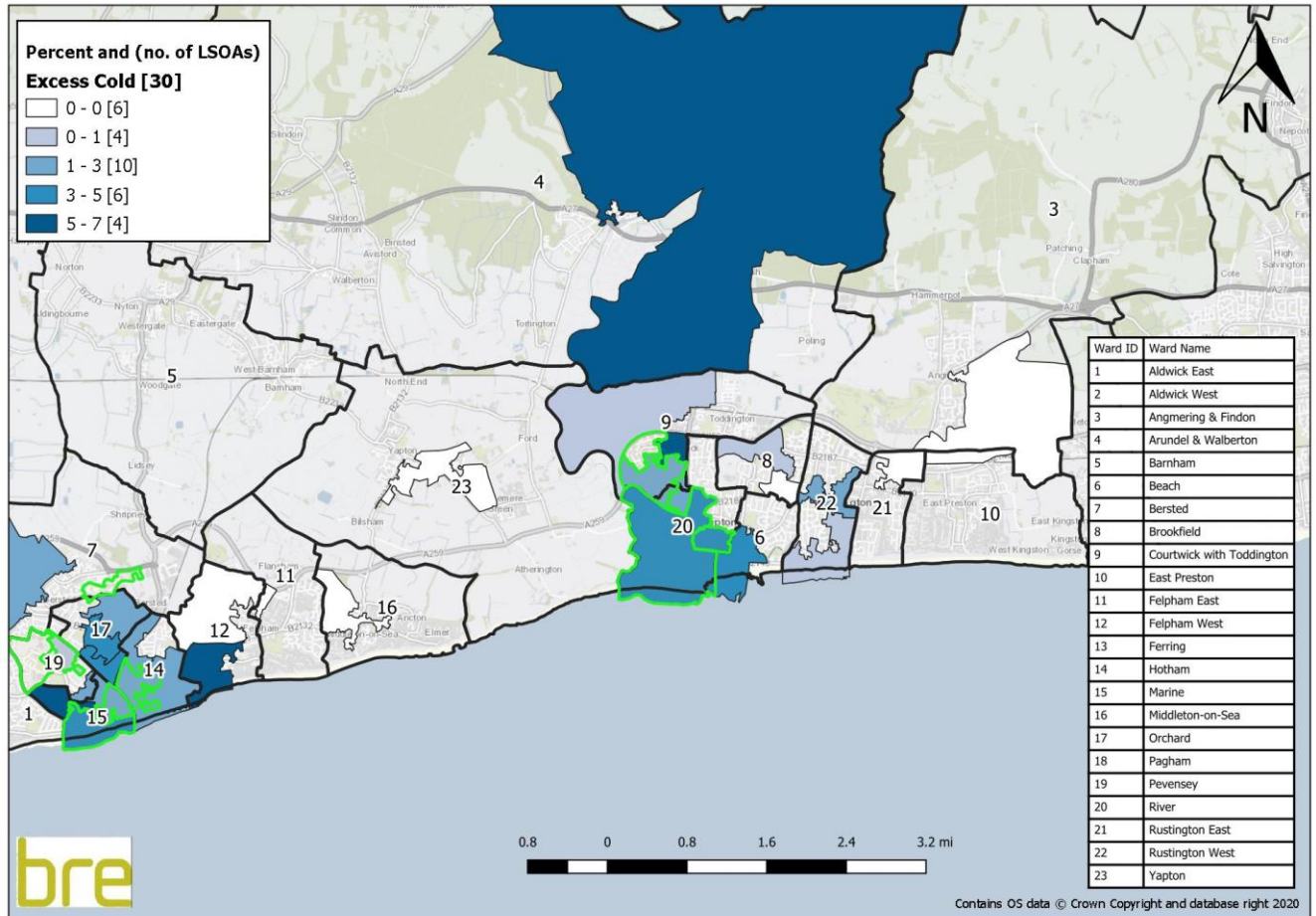


Map D. 9: Distribution of category 1 HHSRS hazards where the proportion of private rented stock is above the national average in coastal areas (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)



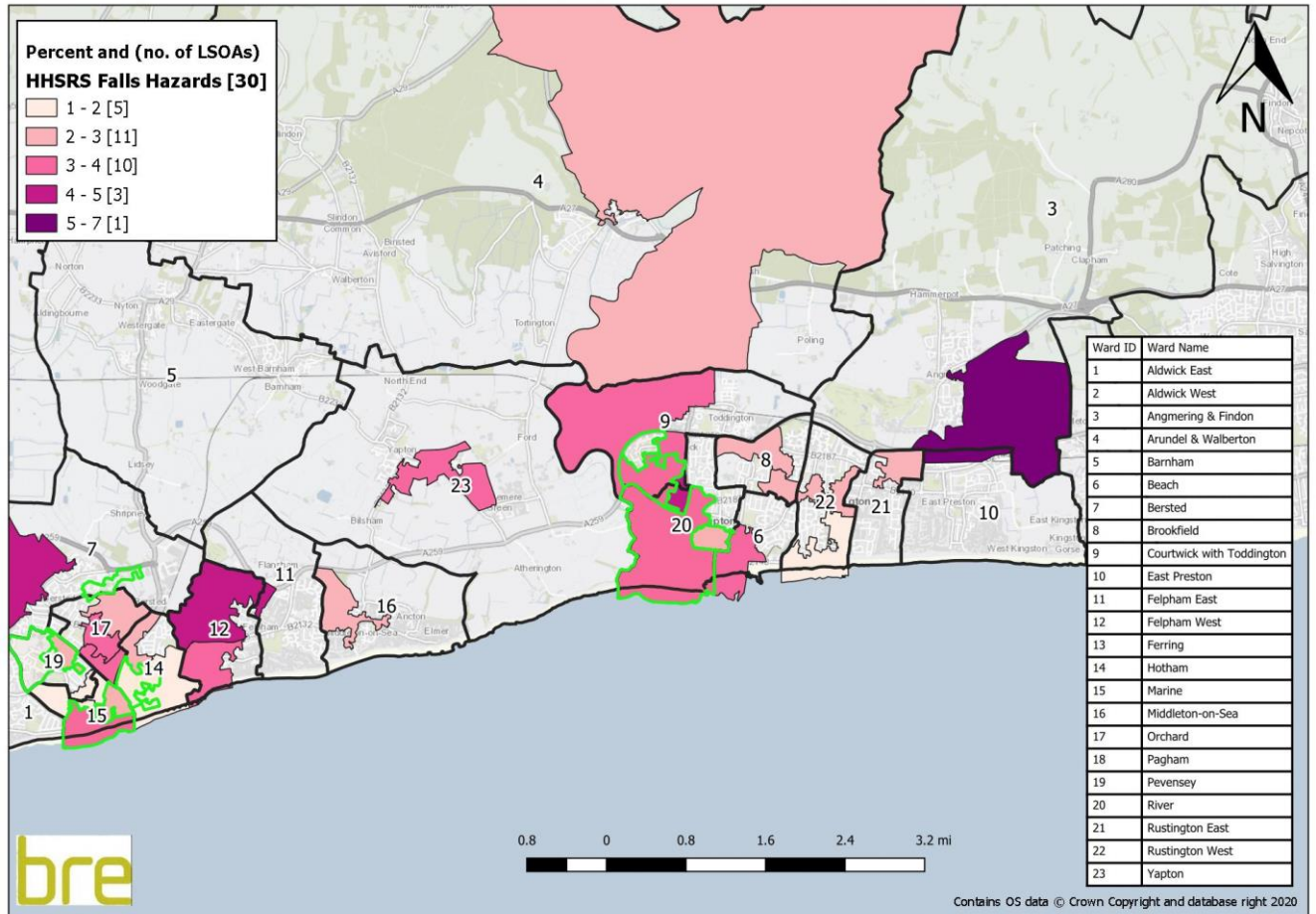


Map D. 10: Distribution of excess cold hazards where the proportion of private rented stock is above the national average in coastal areas (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound [Return to main report](#)



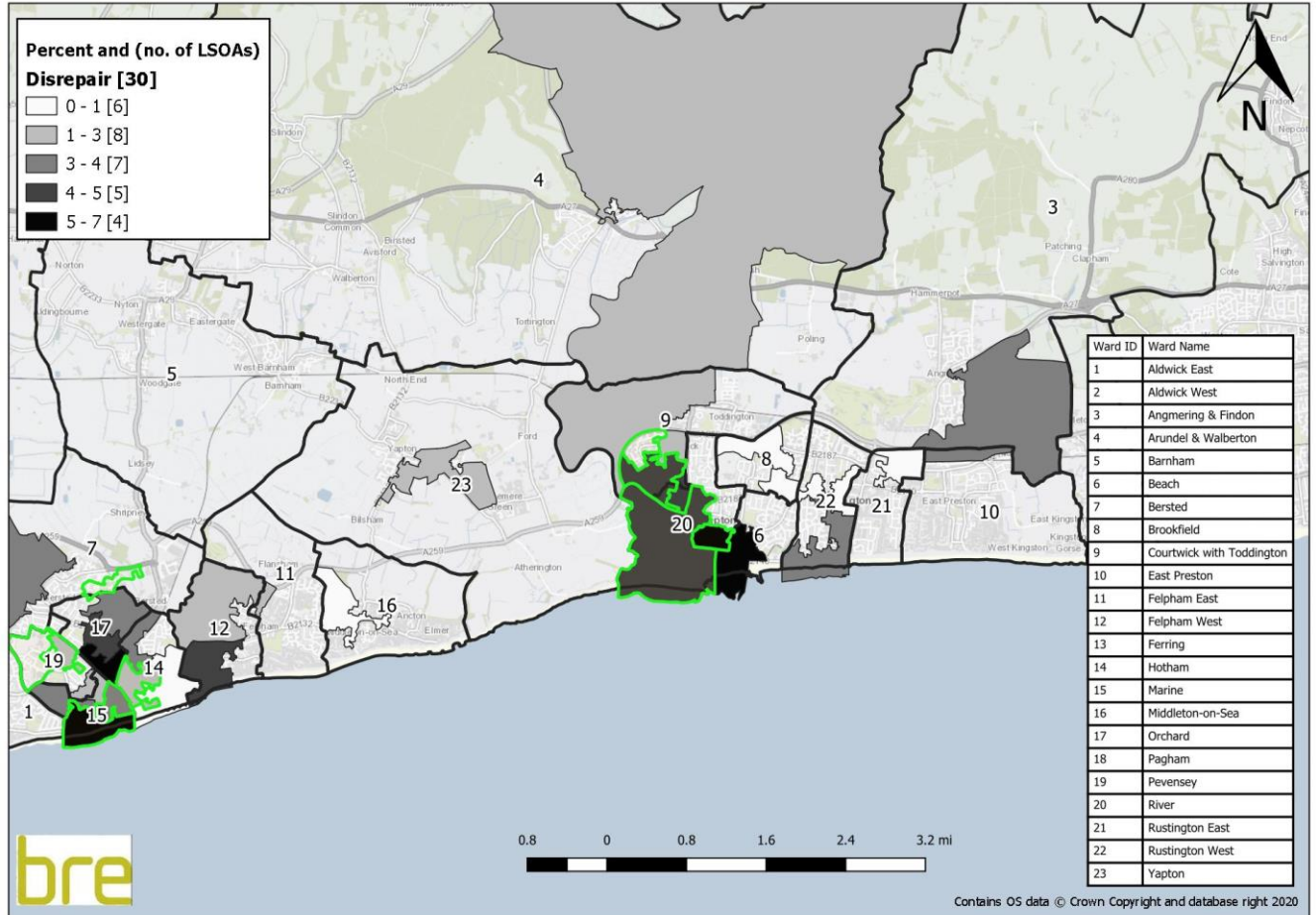


Map D. 11: Distribution of falls hazards where the proportion of private rented stock is above the national average in coastal areas (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)





Map D. 12: Distribution of disrepair where the proportion of private rented stock is above the national average in coastal areas (N.B. the green highlighted LSOAs show the most deprived 20% - Source DLUHC Indices of Deprivation 2019) *N.B. in the legend, values are greater than the lower bound and less than or equal to the upper bound* [Return to main report](#)





Glossary of terms

BREDEM	BRE Domestic Energy Model
Category 1 hazard	Hazards with a HHSRS score of > 1,000. A dwelling with a category 1 hazard is considered to fail the minimum statutory standard for housing
CLG	Department for Communities and Local Government
COA	Census Output Area Designed for statistical purposes, built from postcode units, approximately 125 households
Disrepair	Based on former Decent Homes Standard criteria which states that a dwelling fails this if it is not in a reasonable state of repair – this is based on the dwelling age and condition of a range of building components including walls, roofs, windows, doors, electrics and heating systems
DLUHC	Department for Levelling Up, Housing and Communities (previously MHCLG)
ECO	Energy Companies Obligation Places legal obligations on the larger energy suppliers to deliver energy efficiency measures to domestic energy users
EHS	English Housing Survey A continuous national survey commissioned by the Ministry of Housing, Communities and Local Government (DLUHC). It collects information about people’s housing circumstances and the condition and energy efficiency of housing in England
EPC	Energy Performance Certificate Present the energy efficiency of domestic properties on a scale of A (most efficient) to G (least efficient)
Fuel poverty	The original definition of fuel poverty states that a household is in fuel poverty if it needs to spend more than 10% of their income on fuel to maintain an adequate level of warmth (10% definition). The new definition now adopted by government is that a household is said to be in fuel poverty if they have fuel costs that are above average and were they to spend that amount they would be left with a residual income below the official poverty line (Low Income High Costs definition)
GIS	Geographic Information System A system designed to capture, store, manipulate, analyse, manage and present spatial or geographical data
HHSRS	Housing Health and Safety Rating System



	<p>A risk assessment tool to help local authorities identify and protect against potential risks and hazards to health and safety related deficiencies in dwellings, covering 29 categories of hazards</p>
HIA	<p>Health Impact Assessment</p> <p>A formal method of assessing the impact of a project, procedure or strategy on the health of a population</p>
HMO	<p>Houses in Multiple Occupation</p> <p>An entire house or flat which is let to 3 or more tenants who form 2 or more households and who share a kitchen, bathroom or toilet</p> <p>A house which has been converted entirely into bedsits or other non-self-contained accommodation and which is let to 3 or more tenants who form two or more households and who share kitchen, bathroom or toilet facilities</p> <p>A converted house which contains one or more flats which are not wholly self-contained (i.e. the flat does not contain within it a kitchen, bathroom and toilet) and which is occupied by 3 or more tenants who form two or more households</p> <p>A building which is converted entirely into self-contained flats if the conversion did not meet the standards of the 1991 Building Regulations and more than one-third of the flats are let on short-term tenancies</p> <p>In order to be an HMO the property must be used as the tenants' only or main residence and it should be used solely or mainly to house tenants. Properties let to students and migrant workers will be treated as their only or main residence and the same will apply to properties which are used as domestic refuges</p>
HSM	<p>Housing Stock Model</p> <p>Desktop based modelling used to determine the condition of the housing stock</p>
Jenks' Natural Breaks	<p>The natural breaks classification method is a data clustering method determining the best arrangement of values into different classes. It is achieved through minimising each class's average deviation from the class mean while maximising each class's deviation from the means of the other groups. The method seeks to reduce the variance within classes and maximise variance between classes thus ensuring groups are distinctive</p>
JSNA	<p>Joint Strategic Needs Assessment</p> <p>An assessment of the current and future health and social care needs of the local community</p>
LACORs	<p>Council Coordinators of Regulatory Services – now renamed Local Government Regulation</p>



LAHS	Council Housing Statistics National statistics on housing owned and managed by local authorities
LIHC	Low Income High Cost Measure of fuel poverty, considers a household to be in fuel poverty if required fuel costs are above average, or if they were to spend that amount they would be left with a residual income below the official poverty line
LLPG	Local Land and Property Gazetteer An address database maintained by local authorities
LSOA	Lower Super Output Area Designed for statistical purposes, built from census output areas, approximately 400 households
MHCLG	Ministry of Housing, Communities and Local Government
MSOA	Medium Super Output Area Designed for statistical purposes, built from lower super output areas, approximately 2,000 households
NHS	National Health Service
Older people	People over 65 for the excess cold hazard, people over 60 for the fire and fall hazards (excl. falling between levels)
OS	Ordnance Survey
Poor housing	Dwellings where a category 1 hazard is present
Private sector housing	Housing not owned by the Council or a housing association
SAP	Standard Assessment Procedure Method system for measurement of energy rating of residential buildings.
SimpleSAP	An estimate of a residential dwelling's likely SAP score, it is not based on the full required range of data for a SAP calculation or a reduced data SAP calculation (RDSAP), it should only ever be considered an estimate of the SAP score, and used as a guide
UPRN	Unique Property Reference Number A unique 12 digit number assigned to every unit of land and property recorded by local authorities as part of their LLPG
Vulnerable persons	Persons who are more likely to be affected by the particular hazard as defined by the HHSRS Operating Guidance

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF ENVIRONMENT COMMITTEE ON 14 JULY 2022

SUBJECT:

Potential Increase in the Number of Designated Bathing Waters in Arun District

REPORT AUTHOR:	Roger Spencer (Engineering Services Manager)
DATE:	May 2022
EXTN:	01903 737812
AREA:	Place

EXECUTIVE SUMMARY:

The report seeks authority to undertake the necessary investigation and survey work and then if appropriate to make representation to the Department for Environment Food and Rural Affairs to increase the number of designated Bathing Waters in Arun District.

RECOMMENDATIONS:

The Environment Committee authorises:

1. Investigations, survey work and public consultation to ascertain whether or not any targeted beaches of the Arun District Council coastline, anticipated to meet the criteria for designating Bathing Waters, warrant a request to Department for Environment Food and Rural Affairs (Defra), to designate them as Bathing Waters under the Bathing Waters Regulation 2013 and
2. The Director of Services be authorised, in liaison with the Chair of Environment Committee to request that Defra considers designating any beaches found under 1 above to be suitable for designation.

1. BACKGROUND:

- 1.1. A bathing water is a coastal or inland water that attracts a large number of bathers in relation to any infrastructure or facilities that are provided, or other measures that are taken, to promote bathing at the site.
- 1.2. Water quality is monitored at the designated bathing waters by the Environment Agency between May and September each year to inform an annual classification of the bathing water quality as “excellent”, “good”, “sufficient” or “poor”.
- 1.3. The Department for Environment Food and Rural Affairs (Defra) reviews the

designated bathing waters in England annually, and in May 2022 wrote asking for assistance in reviewing and updating the list of designated bathing waters.

1.4. Any established bathing sites that do not appear in the list of designated waters, which meet the criteria, may be applied for consideration to be designated.

1.5. There are currently six bathing waters in Arun designated under the Bathing Waters Regulation 2013:

- Bogor Regis (Aldwick)
- Bognor Regis East
- Felpham
- Littlehampton
- Middleton-on-sea
- Pagham

1.6. The criteria for designating bathing waters are set out in the guidance on the relevant section of the gov.uk website. These include usage surveys during the bathing season (15 May – 30 September) showing a breakdown of swimmers, children paddling and other beach and water users.

1.7. Also, any information about any facilities at the site that support and promote bathing must be provided, together with evidence of consultation with the public and stakeholders.

1.8. The application must have the support of the landowner or leaseholder; much of the Arun Foreshore is owned or leased from the Crown under a Regulating Lease.

1.9. Bathing waters may be de-designated but it is considered that the six beaches listed above should stay designated. If bathing waters are to be considered for de-designation, then similar surveys, investigations and consultation necessary for designation, are required.

1.10. For those bathing waters under consideration for the following year's bathing season, applications for designation or de-designation must be submitted to Defra by 31 October.

2. PROPOSAL(S):

1. Investigations, survey work and public consultation to ascertain whether or not any targeted beaches of the Arun District Council coastline, anticipated to meet the criteria for designating Bathing Waters, warrant a request to Department for Environment Food and Rural Affairs (Defra), to designate them as Bathing Waters under the Bathing Waters Regulation 2013 and

<p>2. The Director of Services be authorised, in liaison with the Chair of Environment Committee to request that Defra considers designating any beaches found under 1 above to be suitable for designation.</p>																																											
<p>1. OPTIONS:</p> <ol style="list-style-type: none"> 1. Undertake surveys and investigation relating to targeted beaches anticipated to meet the criteria for designating Bathing Waters and apply for designation as appropriate (recommended option) 2. Not to progress the matter and remain with the six existing Designated Bathing Waters 3. Undertake surveys and investigations necessary, with a view to de-designating one of more Bathing Waters 																																											
<p>4. CONSULTATION:</p> <table border="1"> <tr> <td>Has consultation been undertaken with:</td> <td>YES</td> <td>NO</td> </tr> <tr> <td>Relevant Town/Parish Council</td> <td colspan="2" rowspan="3">Consultation will occur once the necessary surveys and investigations have been undertaken</td> </tr> <tr> <td>Relevant District Ward Councillors</td> </tr> <tr> <td>Other groups/persons (please specify)</td> </tr> <tr> <td colspan="3"> <p>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</p> <table border="1"> <tr> <td></td> <td>YES</td> <td>NO</td> </tr> <tr> <td>Financial</td> <td></td> <td>✓</td> </tr> <tr> <td>Legal</td> <td></td> <td>✓</td> </tr> <tr> <td>Human Rights/Equality Impact Assessment</td> <td></td> <td>✓</td> </tr> <tr> <td>Community Safety including Section 17 of Crime & Disorder Act</td> <td></td> <td>✓</td> </tr> <tr> <td>Sustainability</td> <td></td> <td>✓</td> </tr> <tr> <td>Asset Management/Property/Land</td> <td></td> <td>✓</td> </tr> <tr> <td>Technology</td> <td></td> <td>✓</td> </tr> <tr> <td>Other (please explain)</td> <td></td> <td>✓</td> </tr> </table> </td> </tr> <tr> <td colspan="3"> <p>6. IMPLICATIONS:</p> </td> </tr> </table>			Has consultation been undertaken with:	YES	NO	Relevant Town/Parish Council	Consultation will occur once the necessary surveys and investigations have been undertaken		Relevant District Ward Councillors	Other groups/persons (please specify)	<p>5. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 6 below)</p> <table border="1"> <tr> <td></td> <td>YES</td> <td>NO</td> </tr> <tr> <td>Financial</td> <td></td> <td>✓</td> </tr> <tr> <td>Legal</td> <td></td> <td>✓</td> </tr> <tr> <td>Human Rights/Equality Impact Assessment</td> <td></td> <td>✓</td> </tr> <tr> <td>Community Safety including Section 17 of Crime & Disorder Act</td> <td></td> <td>✓</td> </tr> <tr> <td>Sustainability</td> <td></td> <td>✓</td> </tr> <tr> <td>Asset Management/Property/Land</td> <td></td> <td>✓</td> </tr> <tr> <td>Technology</td> <td></td> <td>✓</td> </tr> <tr> <td>Other (please explain)</td> <td></td> <td>✓</td> </tr> </table>				YES	NO	Financial		✓	Legal		✓	Human Rights/Equality Impact Assessment		✓	Community Safety including Section 17 of Crime & Disorder Act		✓	Sustainability		✓	Asset Management/Property/Land		✓	Technology		✓	Other (please explain)		✓	<p>6. IMPLICATIONS:</p>		
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<p>6. IMPLICATIONS:</p>																																											

<p>7. REASON FOR THE DECISION:</p> <p>To enable a review of the District's Designated Bathing Waters to be undertaken and amended if appropriate.</p> <p>Designation leads to bathing water quality monitoring to classify water quality. Classification of bathing water quality can help bathers make informed choices.</p>
--

If bathing water quality is of a high standard, it can be used to promote the area as a tourist destination. This activity contributes to the Council's vision aim to "Fulfil Arun's economic potential" by "Making best use of our natural assets to help drive the economy."

Conversely, if bathing water quality monitoring data identifies concerns with the quality of the additional bathing waters, this data can be used to inform future engagement with relevant stakeholders.

8. BACKGROUND PAPERS:

[Bathing waters: apply for designation or de-designation - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

[Bathing waters - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

EQUALITY IMPACT ASSESSMENT

Name of activity:	Potential Increase in the Number of Designated Bathing Waters in Arun District	Date Completed:	16 June 2022
Directorate / Division responsible for activity:	Services	Lead Officer:	Roger Spencer - ESM - Place
Existing Activity	Y	New / Proposed Activity	N
		Changing / Updated Activity	Y

What are the aims / main purposes of the activity?

Consider an increase in the number of Designated Bathing Waters

What are the main actions and processes involved?

Surveys and consultation with Stakeholders
 Consideration whether bathing waters meet criteria and then application to Defra

Who is intended to benefit & who are the main stakeholders?

Beach users in areas potentially designated areas

Have you already consulted on / researched the activity?

No

Impact on people with a protected characteristic (What is the potential impact of the activity? Are the impacts high, medium or low?)

Protected characteristics / groups	Is there an impact (Yes / No)	If Yes, what is it and identify whether it is positive or negative
------------------------------------	-------------------------------	--

Age (older / younger people, children)	No	
Disability (people with physical / sensory impairment or mental disability)	Yes	Negative
Gender reassignment (the process of transitioning from one gender to another.)	No	
Marriage & civil partnership (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognized for same-sex couples)	No	
Pregnancy & maternity (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	No	
Race (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	No	
Religion & belief (religious faith or other group with a recognised belief system)	No	
Sex (male / female)	No	
Sexual orientation (lesbian, gay, bisexual, heterosexual)	No	
Whilst Socio economic disadvantage that people may face is not a protected characteristic; the potential impact on this group should	No	

be also considered		
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What evidence has been used to assess the likely impacts?	
None	

Decision following initial assessment			
Continue with existing or introduce new / planned activity	Y	Amend activity based on identified actions	Y

Action Plan			
Impact identified	Action required	Lead Officer	Deadline
Consultation with stakeholders with disability	Consider appropriate methods of consultation	Robin Wickham	As part of consultation phase

Monitoring & Review	
Date of last review or Impact Assessment:	N/A
Date of next 12 month review:	N/A
Date of next 3 year Impact Assessment (from the date of this EIA):	N/a

Date EIA completed:	16 June 2022
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Signed by Person Completing:

Roger Spencer – Engineering Services Manager

ARUN DISTRICT COUNCIL

REPORT TO AND DECISION OF ENVIRONMENT COMMITTEE ON 14 July 2022

SUBJECT: Keystone Youth Centre Update

REPORT AUTHOR: Joe Russell-Wells

DATE: July 2022

EXTN: 01903 737914

AREA: NEIGHBOURHOODS GROUP, SERVICES DIRECTORATE

EXECUTIVE SUMMARY:

The Keystone Centre is a long-established centre for a range of youth provision services situated in the deprived ward of Wick Littlehampton. Approval was provided by the Arun District Council (ADC) Cabinet in November 2018 to provide funding and make land available via a lease to Littlehampton Town Council to replace the existing run-down facility at an adjacent area of land. Improvements also include the outdoor facilities that will accompany the new community building.

This report provides an update, next steps, and program for the delivery of these facilities.

RECOMMENDATIONS:

This report is for information only and will not be presented to committees. This report will be taken as read only and questions will be taken at the meeting.

1. BACKGROUND:

- 1.1 The existing Keystone Centre is situated on Arun District Council land and leased to Keystone Centre Management Committee (KCMC) who undertake a range of youth provision services. This facility is in generally poor condition but is a valued facility in the deprived ward of Wick, Littlehampton.
- 1.2 Littlehampton Town Council (LTC) secured Locality funding from central Government and established a business plan to improve youth facilities in Wick, which is widely recognised as one of the most deprived Wards in the District.
- 1.3 The work formed the basis of discussions LTC had with community groups and ADC to identify proposals for a youth enterprise hub. The hub envisages the creation of multiuse youth facilities which can also provide opportunities for young people to a centre where there can be access to training and employment opportunities in

addition to a drop-in centre, café and community space for other activities.

1.4 LTC included the improvement of these facilities within their Neighbourhood Plan, and in May 2018 their Full Council approved a project proposal which would follow ADC approvals for this project.

1.5 In November 2018 ADC's Cabinet approved a report which had set out how this project meets its own objectives within its corporate plan and Vision 2020. The recommendations within the report in brief are as follows:

- Agree to provide land in ADC ownership for the replacement of the existing Keystone Centre and for this to be via a lease for the footprint of the building.
- Work with the Town Council to develop a project brief for the facility.
- Provide a sum of £250,000 towards the project.

The reports also referred to ensuring the existing facility would continue to remain operational during the construction of a new facility, and that demolition of the existing facility would form part of the project.

1.6 In November 2020 Cabinet in addition approved the transfer of S106 funding for the facility which was provided from the Kingley Gate development.

1.7 The site on which the new facility was proposed is public open space (POS). Under the ADC Local Plan POS is protected against development in order that it remains available for the public amenity. However, there are exceptions which the project had to meet in order provide the facility and to mitigate for the loss of POS.

1.8 Proposals alongside the development of a new centre therefore are planned to improve and upgrade the existing site and mitigate for the loss of POS. These include provision of a range of other facilities including a new play area, a Multi-use games area (MUGA), to retained existing BMX track together with other landscape works to improve the overall quality and provision of greenspace for the public to use.

2. Project development

2.1 A consultation was held by LTC in February/March 2019 to seek views on the provision of both the youth facility and the outdoor provision. The proposals were widely supported by stakeholders and the community.

2.2 A brief was developed and Architects HDA (Helyer Davies Architects) were appointed to develop RIBA (Royal Institute of British Architects) Stages 1 & 2 of the proposal for the facility. This was approved by LTC Full Council in June 2020.

2.3 A full consultant team were appointed by LTC to further develop the design and project manage the scheme taking this through all the RIBA stages, including planning approval to the completed facility.

2.4 A further consultation was held as part of the planning submission in Nov 2021. The consultation provided wide support for the proposals.

3. Planning submission

3.1 A full planning application was submitted to ADC in Nov 2021 – ref LU/338/21/PL. The full details can be found on the ADC website. The following plans/drawings can be found at Appendix 1 which provide an illustration of the facilities:

- Site location

- Elevations, floor and roof plan
- 3D of main entrance
- Landscape strategy masterplan

3.2 Planning permission was granted conditionally on 18 February 2022.

4. Outdoor works/masterplan

4.1 As referred above (Items 1.7 & 1.8) the overall project includes work to the outdoor open space areas. The consultants appointed by LTC developed proposals with ADC Officers over the design of the space to address the open space needs and mitigation for the development on the greenspace.

4.2 This resulted in a Landscape strategy masterplan which is illustrated in Appendix 1. This formed part of the planning permission and is a condition of the approval.

4.3 The masterplan includes the delivery of a renewed play area, a fenced MUGA and landscaping across the open space delivering landscape and biodiversity improvements to the greenspace. The play area and MUGA will be funded by ADC through S106 and CIL funding.

4.4 The outdoor works are planned to be delivered in tandem with the development of the new youth facility.

5. Next steps and programme

5.1 A deed of agreement has been signed between ADC and LTC setting out the funding to be provided to LTC by ADC for the project. The total project budget is in the region of £1.5m.

5.2 A draft lease is being drawn up to assign the footprint of the future building to LTC. The lease is due to run for 50 years. The remainder of the site will continue to be managed and maintained by ADC.

5.3 LTC's project management consultants are managing the tendering of the project on LTC's behalf. The closing date for receipt of tenders was Monday 13th June 2022. The bids are currently being evaluated and it is envisaged that, subject to the outcome of this evaluation, a contractor will be appointed in July.

5.4 After a period of mobilisation the works are due to commence on site in the autumn 2022 and completion due in the summer 2023.

5.5 The existing youth facility is to be retained and kept running until the new building is complete. Once complete the demolition of the old building will form part of the project.

6. PROPOSAL(S):

This report is for information only

7. OPTIONS:

Not applicable

8. CONSULTATION:		
Has consultation been undertaken with:	YES	NO
Relevant Town/Parish Council	✓	
Relevant District Ward Councillors	✓	
Other groups/persons (please specify) Consultation with stakeholders and the community as set out in the report	✓	
9. ARE THERE ANY IMPLICATIONS IN RELATION TO THE FOLLOWING COUNCIL POLICIES: (Explain in more detail at 10below)	YES	NO
Financial	✓	
Legal & Procurement	✓	
Human Rights/Equality Impact Assessment		✓
Community Safety including Section 17 of Crime & Disorder Act		✓
Sustainability		✓
Asset Management/Property/Land	✓	
Technology		✓
Other (please explain)		
10. IMPLICATIONS:		
<p>Financial: A deed of agreement has been signed by both parties. Outdoor facilities such as the play area and MUGA are due to be funded by S106 and CIL.</p> <p>Legal: Deed of agreement and the lease to LTC</p> <p>Asset Management/Property/Land: Lease with LTC</p>		

11. REASON FOR THE DECISION: Not applicable

<p>12. BACKGROUND PAPERS:</p> <p>INSERT LINKS TO BACKGROUND PAPERS HERE</p> <ol style="list-style-type: none"> 1. Cabinet November 2018 - KEYSTONE YOUTH FACILITY FUTURE PROVISION AT ELDON WAY WICK LITTLEHAMPTON 2. Cabinet November 2020 - KINGLEY GATE DEVELOPMENT, LITTLEHAMPTON - COMMUNITY FACILITIES AND S106 FUNDING
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Appendix 1

Plans illustrating the new Keystone Youth Facility:

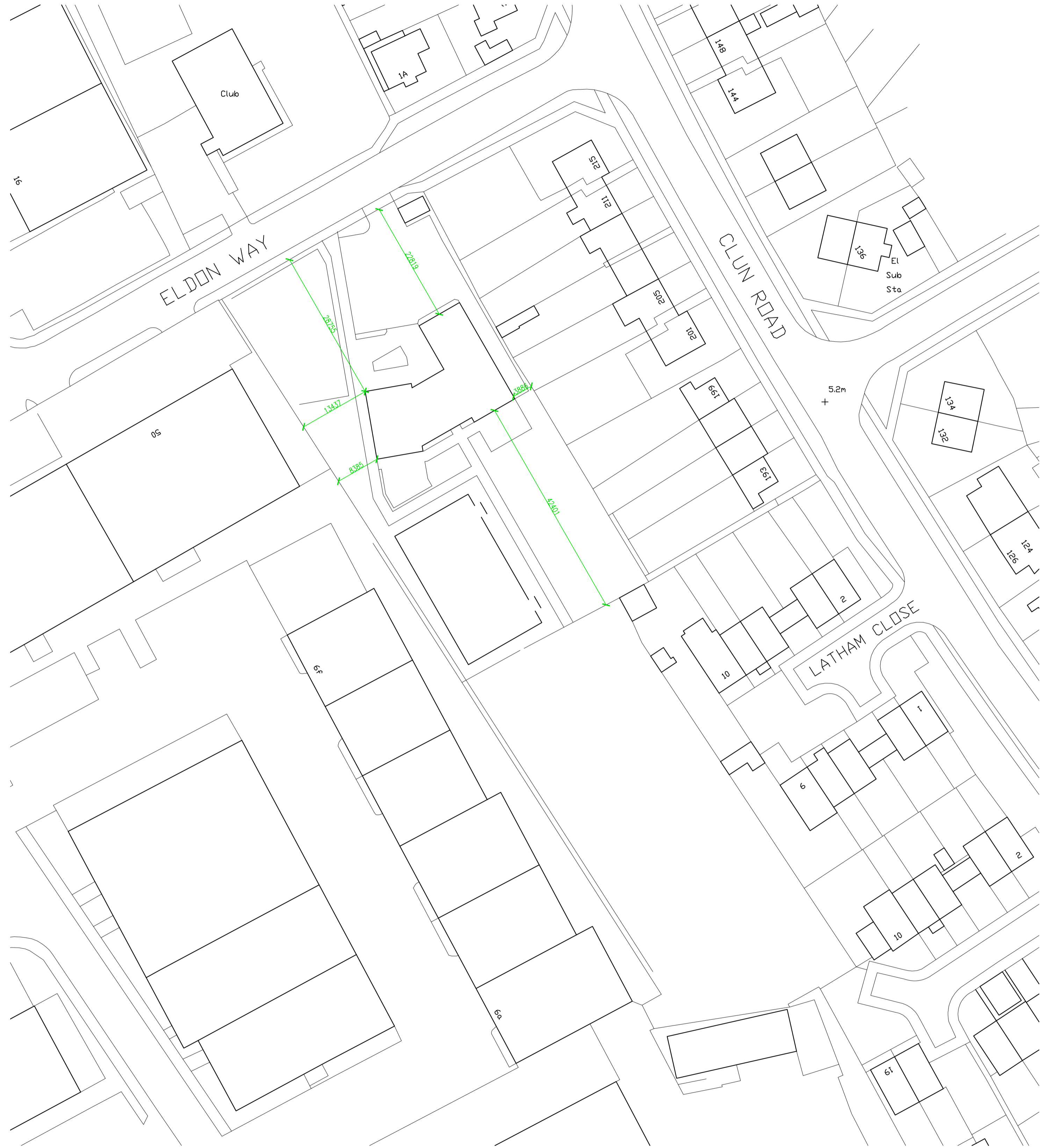
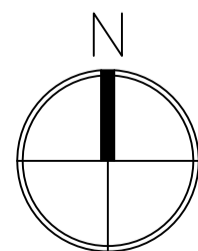
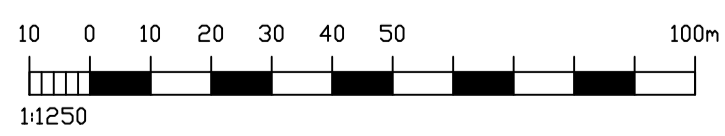
- Location Plan
- 3D main entrance
- Floor and roof plans
- Landscape strategy masterplan

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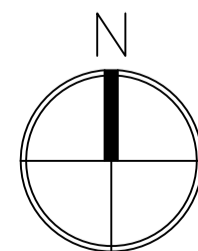
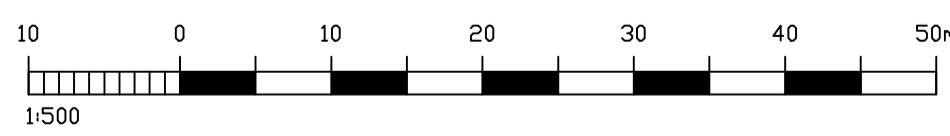
NOTES:
Dimensions to be checked on site before commencing work. Any discrepancies shall be reported to the architect immediately.
Do not scale from these drawings except for planning purposes.
Use figured dimensions only.
Where applicable this drawing is to be read in conjunction with other consultants' drawings.
All drawings to be read in conjunction with specification and other drawings including structural engineer and mechanical and electrical drawings / specification



SITE LOCATION PLAN
1:1250



BLOCK PLAN
1:500

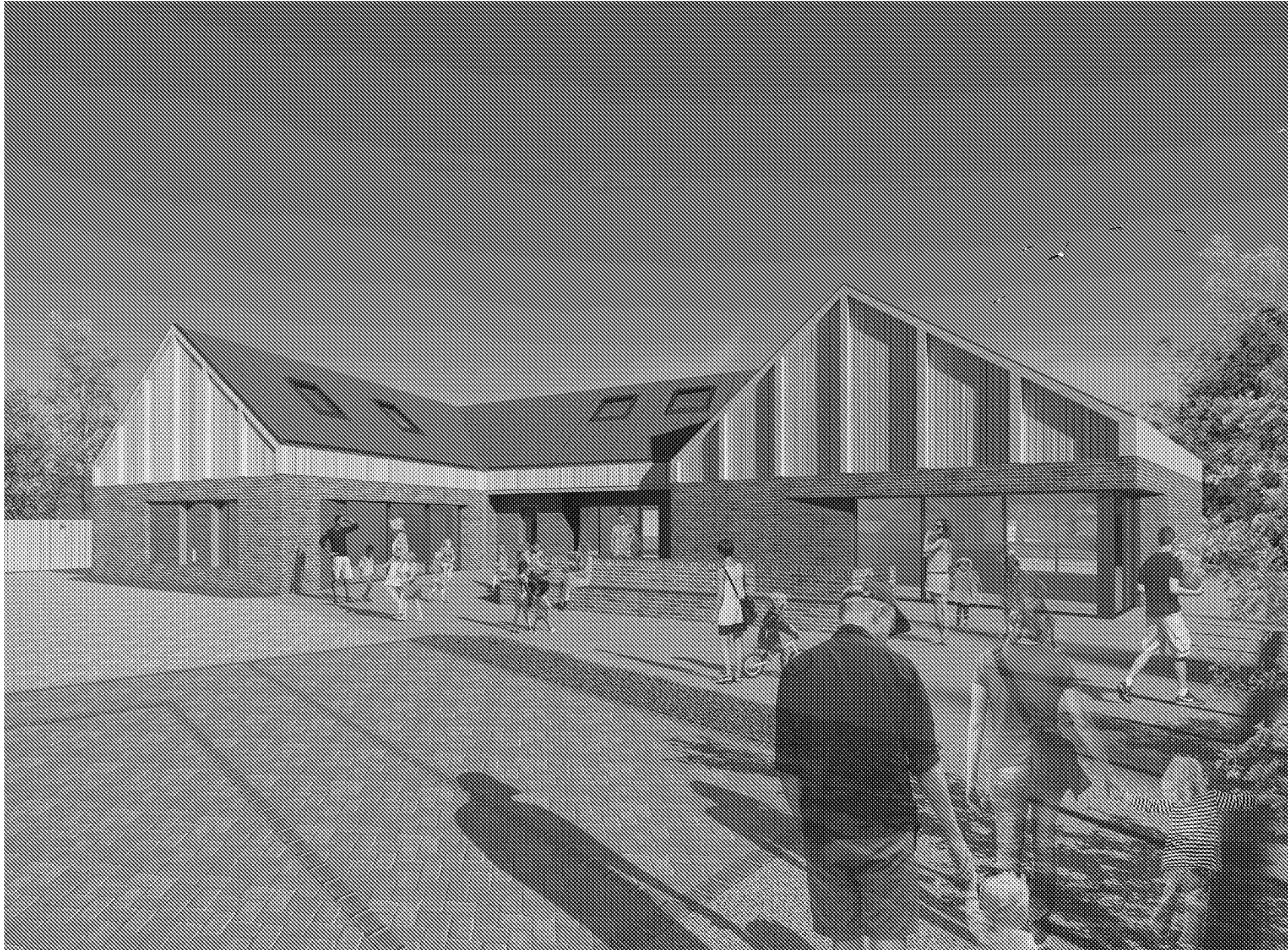


DRAWING
SITE LOCATION & BLOCK PLAN
SCALE
as noted @ A1
DATE
OCT 2021
REVISION
DRAWING NO
20031-01



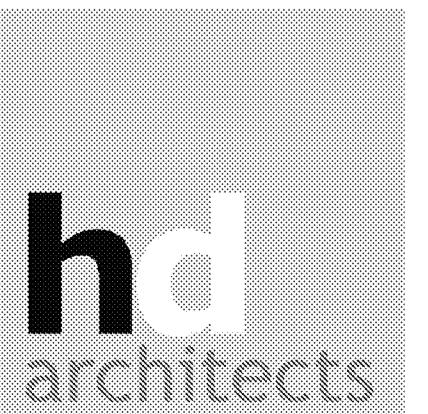
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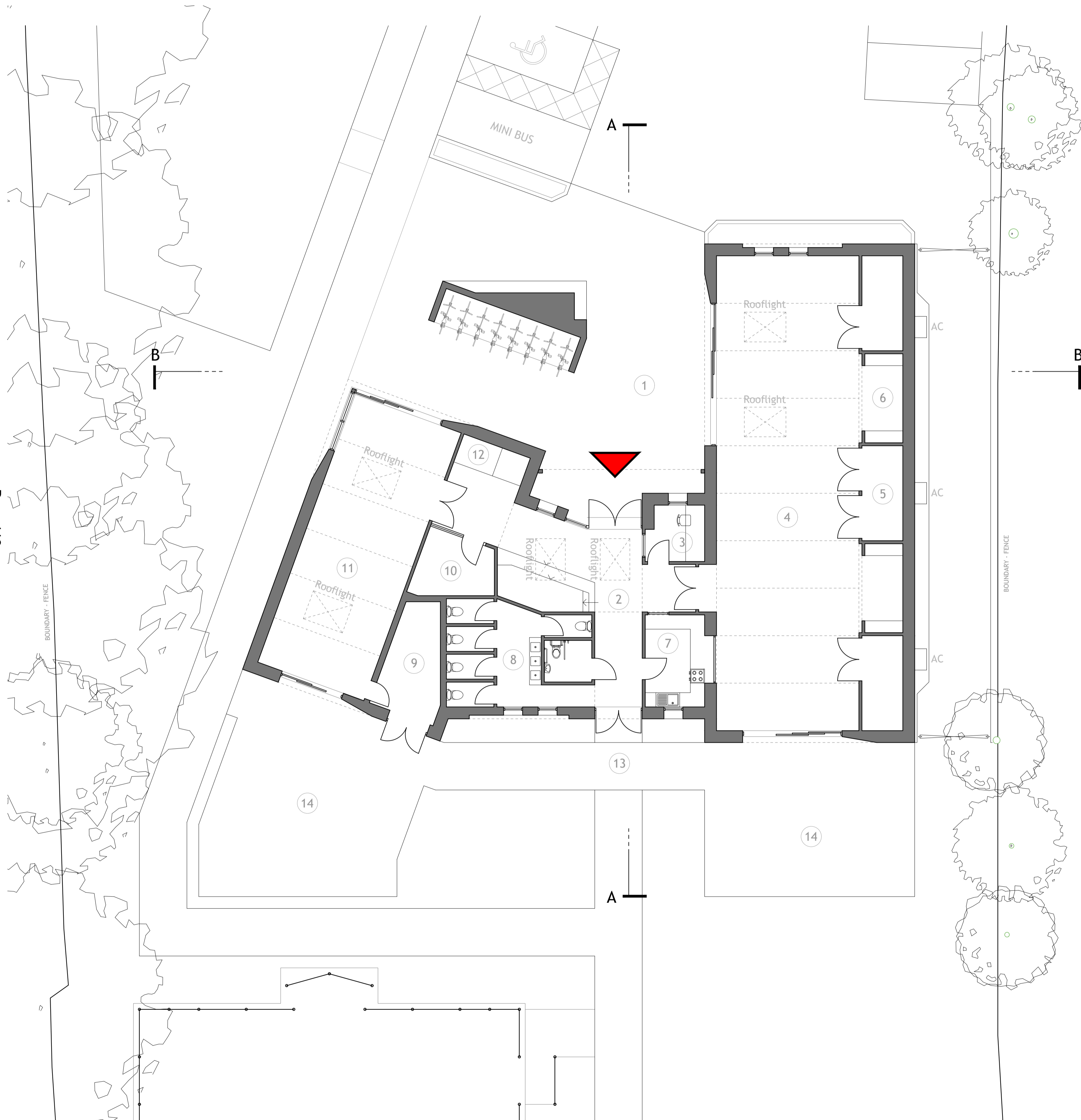
VIEW OF MAIN ENTRANCE
FOR ILLUSTRATIVE PURPOSES ONLY

DRAWING
3D - MAIN ENTRANCE
SCALE
as noted @ A1
DATE
OCT 2021
REVISION
DRAWING NO
20031-09



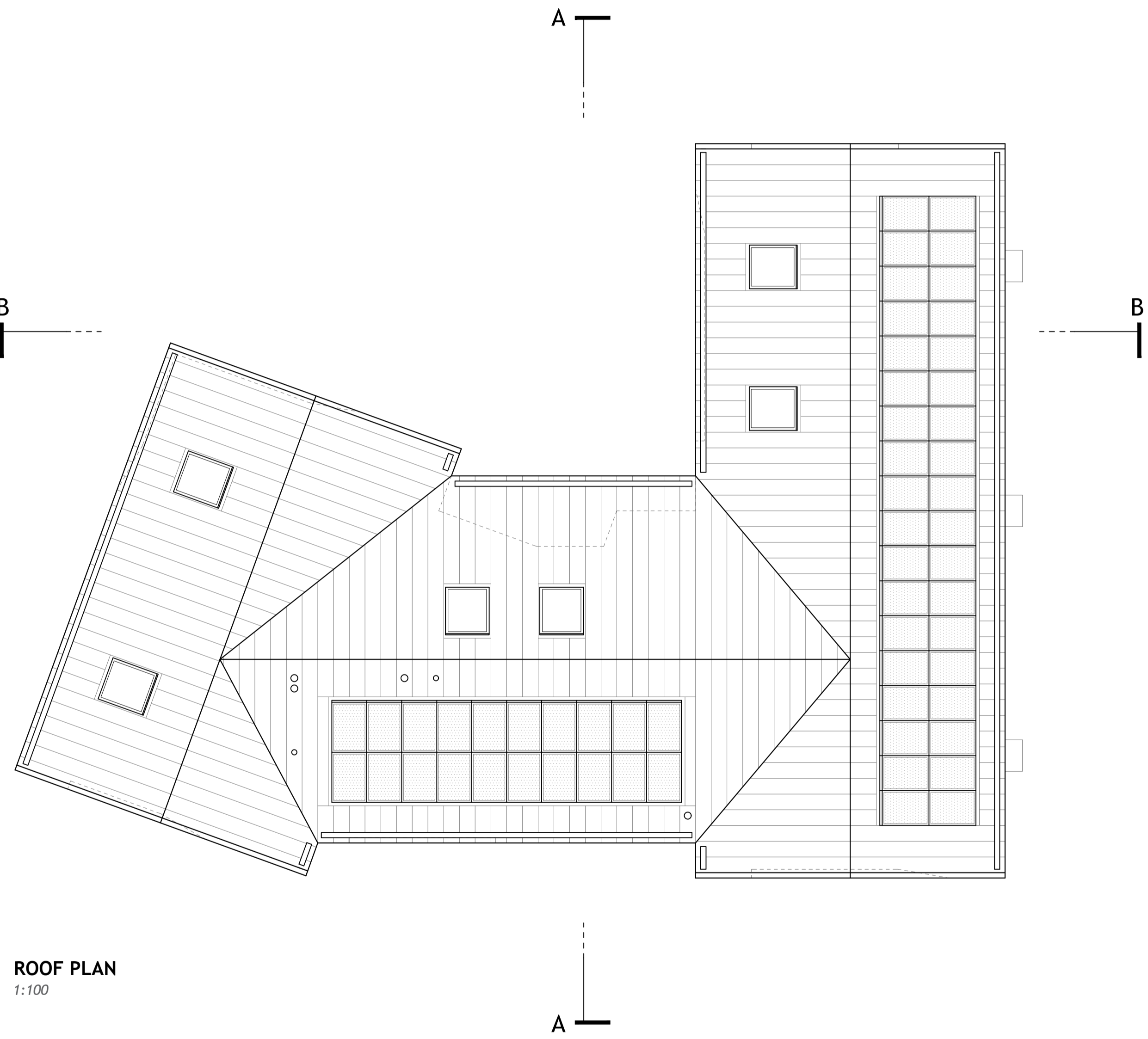
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NOTES:
Dimensions to be checked on site before commencing work.
Any discrepancies shall be reported to the architect immediately.
Do not scale from these drawings except for planning purposes.
Use figured dimensions only.
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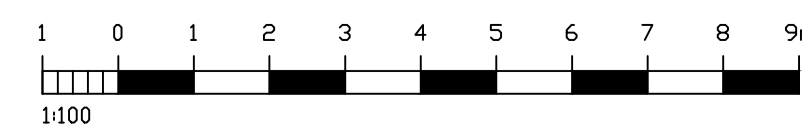
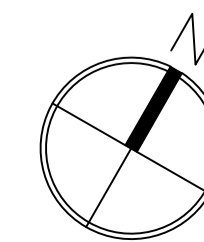


GROUND FLOOR
1:100

ROOF PLAN
1:100



- 1 - ENTRANCE COURTYARD
- 2 - ENTRANCE LOBBY
- 3 - OFFICE
- 4 - MAIN HALL
- 5 - STORAGE
- 6 - BREAK-OUT SPACE
- 7 - KITCHEN
- 8 - TOILETS
- 9 - PLANT
- 10 - 1 to 1 MEETING ROOM
- 11 - MULTIPURPOSE ROOM
- 12 - COSHH
- 13 - ACCESS TO REAR
- 14 - FLEXIBLE OUTDOOR SPACE



DRAWING
PROPOSED FLOOR PLANS
SCALE
as noted @ A1
DATE
OCT 2021
REVISION
DRAWING NO
20031-05

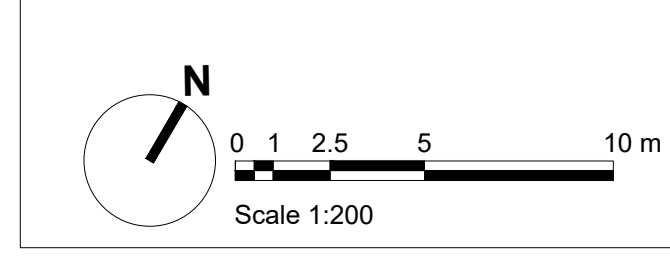


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- Legend**
- Site Boundary
 - Existing - BMX Track
 - Existing - Vegetation
Existing vegetation to be retained where possible and enhanced.
 - Existing - Retained Tree Canopy
 - Proposed - Trees
 - Proposed - Hedgerows
 - Proposed - Planting Areas
 - Proposed - Native Shrub Planting Areas
 - Proposed - Flowering Grassland Areas
 - Proposed - Amenity Lawn
 - Proposed - Fences
 - Proposed - Resin Bound Gravel Surface
Colour varies
 - Proposed - Self-binding Aggregate Surface to Community Garden
 - Proposed - Play Area
 - Proposed - Feature Paving
 - Proposed - Permeable Paving to Car Park
 - Proposed - Macadam to MUGA/ Playing Pitch
 - Proposed - Asphalt to Car Park
 - Proposed - Grass Paving to Maintenance Access
 - Proposed - Indicative Location of Rain Water Harvesting Tanks
 - Proposed - Rainwater Access and Direction

Notes:
 1. Drawing to be viewed in colour.
 2. For description of the landscape design intent refer to LLD2345-LAN-REP-001 - Landscape Design Strategy report.



PLANNING ISSUE

Rev	Description	Date	Initials
03	Planning Issue	24.08.21	GL
02	Planning Issue	20.08.21	GL
01	Planning Issue	20.08.21	GL
00	Draft Issue	06.08.21	GL



Client
 Littlehampton Town Council
 Project Title and Location
 Keystone Youth Centre
 Eldon Way, Littlehampton, West Sussex

Drawing Title
 Landscape Strategy Masterplan

Scale	Drawn	Approved	Date
1:200@A0	GL	MZ	06.08.21

Drawing No
 LLD2345-LAN-DWG-010

Revision
 03

**Landscape Strategy Masterplan
 Keystone Youth Centre - Littlehampton Town Council**

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Environment Committee	<u>Report Author</u>	<u>Date of Meeting</u>	<u>Time</u>	<u>Full Council Meeting Date</u>
Cleansing contract May 2022	Oliver Handson	19-May-22	6pm	13.7.22
Update from the Beach Access Working Party (information update)	Chair			
Keystone update	Joe Russell-Wells	14-Jul-22	6pm	14.9.22
Options for Introducing Further Controls on the Quality of Houses in Multiple Occupation	Louise Crane			
Update from the Beach Access Working Party (information update)	Chair			
Potential increase in the number of designated Bathing Waters in Arun District	Roger Spencer			
Update from the Beach Access Working Party (information update)	Chair	22-Sep-22	6pm	9.11.22

Environment Committee	<u>Report Author</u>	<u>Date of Meeting</u>	<u>Time</u>	<u>Full Council Meeting Date</u>
Bognor Regis Skatepark Bersted Brooks Country Park project Mino Works Contract Update from the Beach Access Working Party (information update) Car Park Charging Proposals	Joe Russell-Wells Joe Russell-Wells Louise Crane Chair Calvin Baylis	17-Nov-22	6pm	18.1.23
Parks / Greenspace Strategy Empty Homes Strategy Update from the Beach Access Working Party (information update)	Oliver Handson Louise Crane Chair	31-Jan-23	6pm	15.3.23