



# Public Document Pack

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Committee Manager Helen Burt (ext. 37614)

07 March 2024

## ENVIRONMENT COMMITTEE

A meeting of the Environment Committee will be held in **Council Chamber, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF** on **Tuesday 19 March 2024 at 6.00 pm** and you are requested to attend.

Members: Councillors Wallsgrove (Chair), Worne (Vice-Chair), Blanchard-Cooper, P. Bower, Brooks, Elkins, Greenway, Madeley, May, Warr and Wiltshire

### **PLEASE NOTE:**

A live webcast of the meeting will be available via the Council's [Committee webpages](#).

Any members of the public wishing to address the Committee meeting during Public Question Time, will need to email [Committees@arun.gov.uk](mailto:Committees@arun.gov.uk) by 5.15 pm on **Tuesday 12 March 2024** in line with current Committee Meeting Procedure Rules.

For further information on the items to be discussed, please contact [Committees@arun.gov.uk](mailto: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 - 8)

The Committee will be asked to approve as a correct record the Minutes of the Environment Committee held on 23 January 2024.

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)

6. CONTAMINATED LAND STRATEGY (Pages 9 - 36)

Local authorities have specific statutory obligations in relation to contaminated land, including a requirement to publish a contaminated land strategy. The current strategy was published in 2001 and has not been substantially reviewed since.

This report seeks adoption of a revised contaminated land strategy for Arun.

7. COMBINED CLEANSING SERVICES CONTRACT (Pages 37 - 78)

The current Combined Cleansing Service Contract (CCSC) expires on 31 January 2026. To successfully procure a new contract within this timeframe, a Committee decision is required now in order to inform the strategic direction and scope of the new CCSC.

8. BATHING WATER QUALITY (Pages 79 - 86)

This report provides an update on the bathing water classification for Bognor Regis (Aldwick) and the actions of the Bathing Water Quality Partnership Group, established to drive the improvement of the bathing water quality and provide assurance and commitment across the partnership organisations.

9. ARUN FLOOD FORUM – INAUGURAL MEETING UPDATE (Pages 87 - 124)

As a result of recent flooding within the District the Arun Flood Forum has been set up to investigate the contributing factors, impacts and possible solutions in a collaborative way. At the first meeting Southern Water (SW) made a presentation to the Forum and a number of questions to SW and other Forum members was asked. This report provides an update following this meeting of the Forum.

10. FREE PARKING SCHEME REVIEW WORKING PARTY - 05 FEBRUARY 2024 (Pages 125 - 132)

The Chair of the Free Parking Scheme Review Working Party, Councillor Wallsgrove, will provide a brief update on the first meeting of the Working Party held on 05 February 2024.

## **OUTSIDE BODIES - FEEDBACK FROM MEETINGS**

11. WORK PROGRAMME (Pages 133 - 136)

The Committee is required to note the Work Programme for 2023/24.  
[5 Minutes]

**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](#)

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# Public Document Pack Agenda Item 3

Subject to approval at the next Environment Committee meeting

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## ENVIRONMENT COMMITTEE

23 January 2024 at 6.00 pm

Present: Councillors Wallsgrove (Chair), Worne (Vice-Chair), Blanchard-Cooper, P. Bower, Brooks, Elkins, Greenway, Madeley, May, Warr and Wiltshire

Councillors Gunner, Lury, Pendleton, Stanley, Tandy, and Yeates were also in attendance for all or part of the meeting.

### 542. DECLARATIONS OF INTEREST

Councillor Greenway declared a Personal Interest in Agenda Item 6 as a Member of Bersted Parish Council and a Member of Friends of Bersted Brooks.

Councillor Warr declared a Personal Interest in Agenda Item 6 as a resident of Bersted.

### 543. MINUTES

The Minutes of the meeting held on 21 November 2023 were approved by the Committee. These would be signed after the meeting.

One Member wished to discuss matters arising from the last meeting, however was advised by the Chair that the purpose of Item was to approve the accuracy of the minutes from the last meeting only, and any questions could be put in writing to Officers.

### 544. 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.

### 545. PUBLIC QUESTION TIME

No public questions had been submitted for this meeting.

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546. BERSTED BROOKS PARK PROJECT

[Councillor Greenway re-declared his Personal Interest during discussion of this Item]

Upon the invitation of the Chair, the Principal Landscape Officer presented the report, which summarised the project background and provided an update on the Bersted Brooks Park project. This included a summary of the stakeholder engagement and public consultation, and it outlined proposals to be taken forward. The aims of the project were to enhance the open spaces in terms of biodiversity and accessibility for the public. It created the opportunity to mitigate the effects of climate change and flooding. The main messages taken from the consultation were that people were supportive of individual improvement proposals, but there were concerns about including areas of Bersted Park, which largely related to encouraging more people into the residential area and the impact this would have on parking locally. The main responses were summarised in Appendix 2. The principles of enhancing the open spaces were supported by the public, with results showing most people responded positively to the proposals presented. 86% of people wanted to see the creation of natural flood interventions, with 85% of people supporting the idea of wetland planting to improve flood resilience. The masterplan had been changed in response to the consultation feedback, and the new proposed areas were shown in Appendix 5. The benefits of the proposals included increasing accessibility to visitors, creating the opportunity for learning about the natural environment, enhanced wildlife habitats and mitigating the impact of future flooding.

The recommendations were proposed by Councillor Greenway and seconded by Councillor Bower.

Members then took part in a debate and the following points were raised:

- Page 27 mentioned 'Raised walkways / improved access'. It was asked that it be made clear this would improve access for people with disabilities. The Principal Landscape Officer confirmed Officers had taken note of this.
- Could it be confirmed that the 'Improved Parking' would make use of permeable surface? The Principal Landscape Officer confirmed Officers had taken note of this.
- Waymarking and signage – could this include a braille interpretation? The Principal Landscape Officer confirmed Officers had taken note of this.
- Natural Play – could this include sensory elements to ensure children would get the most out of this? The Principal Landscape Officer confirmed Officers had taken note of this.
- Clarification was sought regarding the budget for the project. This was provided by the Group Head of Finance and Section 151 Officer, and the detail of this was contained within the Quarter 3 Budget Monitoring Report.
- Support was offered for the masterplan and the positives the project would bring such as flood mitigation, learning opportunities for school children, and it was acknowledged the project was generally supported by the public.

- It was noted that this project was currently at masterplan stage, and changes could still be made.
- There was concern raised about the cost, and Officers were asked to obtain external funding from partners to assist with costs wherever possible.
- It was asked whether an update report could be brought back to the Committee. The Group Head of Environment and Climate Change confirmed Members would be updated on progress of the project.

A discussion took place around the name of the completed project and the Chair suggested this be changed to Bersted Brooks Local Nature Reserve and Park. The Group Head of Environment and Climate Change suggested an alternative of 'Bersted Brooks' which was supported by Members.

The Committee gave permission for non-Committee Members to speak. Support was offered for the project in general, however there was concern regarding the section towards the Bersted Park Community Centre, which was a distance from the main site and required people to cross a busy 50mph road. There was also concern people would park at the Bersted Park Community Centre and other locations that were unsuitable. It was felt this area along the South of the A259 did not need to be included, and it would be a concern for local residents. The Group Head of Environment and Climate Change explained that if this area was not included, it would limit what could be achieved in the rest of the project, and would mean these areas would be less accessible. Officers recognised there were concerns around parking, however confirmed there would be suitable locations for visitors to park. Visitors would not be encouraged to park in the Bersted Park housing development area, and signage would point people away from this. One of the reasons for the proposed new area of the project was to encourage people to park elsewhere at the other end of the site. If the area South of the A259 was included in the project, it may make obtaining funding from external agencies more achievable.

The Committee

RESOLVED

That the revised area of the Bersted Brooks masterplan as shown in Appendix 5, be endorsed

#### 547. COMMITTEE REVENUE AND CAPITAL BUDGETS 2024/25 - ENVIRONMENT

Upon the invitation of the Chair, the Group Head of Finance and Section 151 Officer introduced the report to Committee. He updated that there was a change to the Table in paragraph 4.5, page 93, which should say 'Do not recruit to vacant Parking Services Permit post', not the Parks Officer post. There was a difference in cost of around £6k, however he did not propose changing the Committee budget on that basis as the amount was immaterial. The overall revenue budget increase from 2023-24 was £90k as detailed in Table 4.4 on page 92. The savings of £543,000 identified in the

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Financial Strategy paper were detailed in the Table in paragraph 4.5. The Environment Committee Capital Programme was detailed in Appendix B, this did not currently include slippage from programs like Bersted Brooks, but this would be included after 31 March once the slippage had been confirmed. The schemes had already been approved and no further Committee approval would be required as there was no additional expenditure.

The Group Head of Finance and Section 151 Officer understood there would be some elements of the budget that Members would not ideally choose, however Members were aware that the budget needed to be reduced. He explained if amendments were made to the budget that increased the total spend for the Committee, it would effectively increase the draw down the Council would have to make on its usable revenue reserves, which would increase financial pressure on the Council.

The recommendations were proposed by Councillor May and seconded by Councillor Blanchard-Cooper.

Members (and non-Committee Members given permission to speak) then took part in a question-and-answer session and the following points were made:

- Further information was requested around the reduction of seasonal foreshores staff hours. Officers explained they were looking at how this could be done in a way to limit the impact on the public, which may mean shorter hours at the beginning and end of the season.
- How would the additional income from cemetery fees be achieved? Officers were looking at the range of fees, but were trying to reduce the impact on the lower cost fees.
- Where would the savings in event management come from? This had not yet been decided, but Officers were trying to limit the impact to the public on this.
- Clarification was sought on the updated budget for play areas in Appendix B. The Group Head of Finance and Section 151 Officer explained this included slippage from previous years, which was why there appeared to be a sharp rise.
- It was asked whether details could be provided to Members around the savings as and when they became available.
- Concern was expressed by several Members as it was felt not enough detail had been provided in advance of the meeting, particularly around consequences of the savings, and not enough consultation had taken place.
- There was concern around cemetery fees and it was thought Members should have input into these. The Group Head of Finance and Section 151 Officer pointed to Part 6, Section 3, paragraph 5.2 of the Constitution and explained Officers were responsible for raising money through fees and charges.
- It was asked that the budget process not be carried out in this way again, and more consultation be conducted with Members next year. It was felt Members should be included in the process earlier on. The Chair asked Officers to take these comments on board for next year.
- It was felt there were gaps in additional information that had been provided to Members the previous day.



- Other Members thanked Officers for their work, and appreciated Officers had worked hard.
- It was recognised that all Councils across the country were having to make cuts that they would otherwise choose not to.
- It was asked whether the performance of departments would be considered in relation to budget, an example given was Building Control as it appeared to have a greater budget this year than last, however the performance was lower than target. Specific detail could not be provided by Officers as the question had not been submitted prior to the meeting. The Group Head of Technical Services explained the Building Control budget figures for last year showing in the report was the actual budgeted figure and appeared lower as they had been carrying vacancies, and had generated more income than expected. The original budget for last year had been much higher.
- Clarification was sought around the difference between the original budget and the updated budget. This was provided by Officers.

During the above debate, the Chair reminded Members that detailed questions should be sent in advance of the meeting, to enable Officers to provide answers for Members.

The Interim Chief Executive Officer and Director of Growth explained the budget process had taken a considerable amount of time. It had taken time to generate ideas and then to explore these further, and he said this had been brought to Members at the earliest opportunity. He believed Members had received a significant amount of additional information during this process compared to previous years, however Officers could take on board the comments from Members around this.

#### The Committee

##### RESOLVED that

- (a) It agrees the 2024/25 Revenue Budget as illustrated in Appendix A of this report;
- (b) It agrees the 2024/25 Capital Programme as illustrated in Appendix B of this report; and

##### RECOMMENDS TO POLICY AND FINANCE COMMITTEE that

- (c) the Revenue Budget for this Committee be included in the overall General Fund Budget when the Policy and Finance Committee considers the Council's budgets at its meeting on 8 February 2024.

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548. BUDGET MONITORING REPORT TO 31 DECEMBER 2023

[Councillor Brooks declared a Personal Interest during this Item as Ward Member for Marine (relating to beach access)]

Upon the invitation of the Chair, the Group Head of Finance and Section 151 Officer introduced the report to Committee. He highlighted Table 1 on paragraph 4.1 (page 100), which indicated a revenue budget underspend of £339k, a positive change of £284k from quarter 2. This was largely due to an increase in parking income. The parking charges were introduced in January last year, however they had not been built into that year's budget. There was slippage in areas such as Bersted Brooks and Play Areas, so the budgets had not been lost, but carried over.

The following points were raised by Members (and a non-Committee Member given permission to speak):

- It was felt that installing the free ticket machines at Felpham and Middleton was a cost that should have been avoided.
- There was currently no budget for beach access, which was felt important. It was suggested that Officers reach out and obtain funding for this.

The Committee noted the report.

549. Q3 PERFORMANCE REPORT FOR THE KEY PERFORMANCE INDICATORS (KPI'S) WHICH FORM PART OF THE COUNCIL'S VISION 2022-2026.

Upon the invitation of the Chair, the Group Head of Technical Services introduced the report, the purpose of which was to update the Committee with the Quarter 3 Performance Outturn for the Key Performance indicators for the period 1 April 2023 to 31 December 2023.

The Chair invited questions and the subject of household waste was discussed by Members. It was asked what could be done to improve the recycling rates. The Group Head of Environment and Climate Change explained that the Government had now mandated that a separate food waste collection be delivered by authorities, and a report on this would be presented to Committee in March. The previous Food Waste trials had a positive impact on recycling rates and achieved 60%, and it was anticipated this would help to meet targets. Residents feedback was 90% positive regarding these trials. West Sussex County Council were also carrying out work to educate people on waste and recycling, including visiting schools. One Member suggested that the Waste Partnership be invited to more community events.

The Committee noted the report.

550. OUTSIDE BODIES

There were no Outside Bodies reports.

551. WORK PROGRAMME

The Work Programme was introduced by the Group Head of Environment and Climate Change. It was asked whether a scrutiny report for cleansing could be added to the Work Programme.

There were questions around the Flood Forum and when this would take place. Officers advised that the first meeting would take place on 26 February 2024, and further information regarding this would soon be distributed to Members.

The Group Head of Environment and Climate Change explained that Officers were currently reviewing Items to be included on the Work Programme for the next municipal year, including regular report updates to Committee.

The Committee noted the Work Programme.

(The meeting concluded at 7.37 pm)

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## Arun District Council

<b>REPORT TO:</b>	<b>Environment Committee – 19 March 2024</b>
<b>SUBJECT:</b>	<b>Contaminated Land Strategy</b>
<b>LEAD OFFICER:</b>	<b>Nat Slade, Group Head of Technical Services</b>
<b>LEAD MEMBER:</b>	Councillor Sue Wallsgrove
<b>WARDS:</b>	<b>All</b>
<b>CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:</b>	
<ul style="list-style-type: none"> <li>• Improving the wellbeing of Arun</li> <li>• Supporting our environment to support us</li> </ul>	
<b>DIRECTORATE POLICY CONTEXT:</b>	
<p>Contaminated land responsibilities within Arun principally rest with the Environmental Health service. The service vision within the Growth Directorate Plan July 2023 is: <i>to protect public health by focusing our work on the quality of what we eat, where we live and work, the air we breathe and the land on which we stand.</i></p>	
<b>FINANCIAL SUMMARY:</b>	
No additional expenditure has been identified as a result of this report.	

### 1. PURPOSE OF REPORT

1.1 To seek adoption of the revised contaminated land strategy for Arun.

### 2. RECOMMENDATIONS

2.1 That Committee adopts the revised contaminated land strategy.

2.2 That authority is given to the Group Head of Technical Services to make minor and administrative amendments to the strategy.

### 3. EXECUTIVE SUMMARY

3.1 Local authorities have specific statutory obligations in relation to contaminated land, including a requirement to publish a contaminated land strategy. The current strategy was published in 2001 and has not been substantially reviewed since.

3.2 This report seeks adoption of a revised contaminated land strategy for Arun.

## 4. DETAIL

- 4.1. Contaminated land is regulated by Part IIA of the Environmental Protection Act 1990 and requires local authorities to prepare, implement and review a contaminated land strategy. Sites which are determined as contaminated are required to be published in a public register.
- 4.2. The Council's current strategy was originally published in 2001 and has not since been substantially reviewed. There have been number of significant changes since 2001, including publication of new statutory guidance (Defra 2012), amendment to Part IIA, removing a previous exemption concerning radon impacted land and creation of the South Downs National Park.
- 4.3. Due to the time that has passed since publication of the current strategy, the changes that have occurred in this period and the need to ensure that the strategy remains current and meets statutory obligations, a detailed review has been carried out and a revised strategy is presented at Appendix 1.
- 4.4. Contaminated land is defined by the above legislation and means any land which is in such a condition that due to substances in or under land either:
  - significant harm is being caused or there is significant possibility of such harm being caused; or
  - pollution of controlled waters is being caused or there is a significant possibility of such pollution being caused

When land is contaminated, it may pose a risk to people or the environment.

- 4.5. Defra Statutory Guidance (April 2012) explains how local authorities should implement the contaminated land regime, including the contents of the written strategy. This guidance is legally binding on local authorities and has been duly considered in conducting the review and preparing the revised strategy.
- 4.6. The statutory guidance requires the council to continue to identify and prioritise sites that may be potentially contaminated, followed by conducting detailed inspections of sites where the need for further investigation has been identified.
- 4.7. The revised strategy details how the council intends to meet its statutory duties to inspect its area for contaminated land, the main aims of which are:
  - identify potential and actual contaminated sites within the district using rational, ordered and efficient investigation
  - remove unacceptable risks to human health and the environment
  - seek investigation and remediation through the planning system
  - carry out detailed inspection of urgent sites where there is, or likely to be, significant possibility of significant harm occurring
  - prevent the creation of new contaminated sites
  - reinforce a 'suitable for use' approach
  - ensure that burdens faced by individuals, companies and the community are proportionate, manageable and compatible with the principles of sustainable development.

- 4.8 The Council has already identified and prioritised numerous potentially contaminated sites, the majority of which are low or medium risk commercial sites which will not be further investigated unless redeveloped.
- 4.9 Environmental Health routinely comment on planning consultations, including in relation to contaminated land and this will continue to be the chief mechanism for managing contaminated land risks. Environmental Health will continue to provide information on potentially contaminated sites through Environmental Information Requests (for which a fee applies) and maintain a public register of contaminated land.
- 4.10 The existing contaminated land database requires an extensive review to ensure all information is migrated to the Environmental Health database and is available in the corporate mapping system. Once completed, the reprioritising and associated investigation of sites will be conducted.
- 4.11 Detailed investigations will be carried out according to a risk-based priority, starting with the highest risk sites. The Council will continue to provide support for those commissioning investigations on private land. The council will work with residents to ensure that they are informed of any site investigation and remediation that affects them.
- 4.12 The Council will try to hold previous polluters and or developers accountable and responsible for any remediation. Where this is not possible, residents will be required to contribute. A hardship policy may be used to ensure this is as proportionate and as fair as possible. Reports of potentially contaminated land will be investigated and the appropriate action will be taken.
- 4.13 The main changes to the Strategy include updating procedures to ensure the policy is complimentary with current legislation and guidance such as Defra revised statutory guidance, and the changing landscape (e.g. the creation of a national park). In addition, the revised strategy outlines how the council intends to implement the contaminated land regime through utilisation of the planning process and by promoting a risk-based approach.
- 4.14 The revised Contaminated Land Strategy is provided at Appendix 1 and is recommended for adoption.

## **5. CONSULTATION**

- 5.1 Consultation has taken place with internal stakeholders including Arun Planning and Property and Estates, and with external stakeholders, including West Sussex Public Health, South Downs National Park Planning Authority, Environment Agency, neighbouring Local Authorities and United Kingdom Health Security Agency (UKHSA). No objections or adverse comments were received.

## **6. OPTIONS / ALTERNATIVES CONSIDERED**

- 6.1 Not to adopt the revised Contaminated Land Strategy. This means continuing to operate with an out-of-date strategy which could be subject to challenge and may not fulfil our statutory obligations.

## **7. COMMENTS BY THE GROUP HEAD OF FINANCE/SECTION 151 OFFICER**

- 7.1 No financial impact, officers time is met by existing budgets.

## **8. RISK ASSESSMENT CONSIDERATIONS**

- 8.1 Adopting a revised Strategy ensures Arun meets its obligations under Part IIA of the Environmental Protection Act 1990 and importantly sets out the actions that will be taken manage contaminated land within Arun.

## **9. COMMENTS OF THE GROUP HEAD OF LAW AND GOVERNANCE & MONITORING OFFICER**

- 9.1 There are no specific legal implications

## **10. HUMAN RESOURCES IMPACT**

- 10.1 There are no direct human resource impacts arising from the proposals.

## **11. HEALTH & SAFETY IMPACT**

- 11.1 Contaminated land can be associated with a number of adverse health impacts. This strategy sets out priorities and actions for managing contaminated land within Arun, and as such will have a positive impact on health and safety.

## **12. PROPERTY & ESTATES IMPACT**

- 12.1 Any property owned or managed by Arun will be subject to the adopted strategy.

## **13. EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE**

- 13.1 An Equalities Impact Assessment has been carried out and is provided at Appendix 2 of this report. Decisions concerning contaminated land are made based on the levels and type of contaminated irrespective of protected characteristics and should therefore overall have positive impacts.

- 13.2 Children are more at risk from the effects of contaminated land and implementation of the strategy will offer positive impacts to this group.

- 13.3 By determining land as contaminated, the appropriate person will be required to fund remediation; where possible this will be the polluter or the developer. However, remediation costs could be significant depending on the levels of type



of contamination and have the greatest impact on those at a socio-economic disadvantage.

#### **14. CLIMATE CHANGE & ENVIRONMENTAL IMPACT/SOCIAL VALUE**

14.1 There are direct links between contaminated land and environmental impacts, therefore managing contaminated land will also have positive environmental impacts.

#### **15. CRIME AND DISORDER REDUCTION IMPACT**

15.1 There are no direct impacts to crime and disorder from the proposals.

#### **16. HUMAN RIGHTS IMPACT**

16.1 There are no direct human rights impacts from the proposals.

#### **17. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS**

17.1 There are no direct freedom of information or data protection impacts from the proposals. It is a legal requirement for the council to maintain a public register of contaminated sites, which must include details of any remediation notices served.

17.2 Contaminated land reports and information held by the Council may be subject to information access requests and any release of information will be subject to the requirements of the relevant legislation, including Environmental Information Regulations 2004 and Freedom of Information Act 2000.

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#### **CONTACT OFFICER:**

Name: Kate Giddings

Job title: Senior Environmental Health Officer

Contact details: 01903 737586 and [kate.giddings@arun.gov.uk](mailto:kate.giddings@arun.gov.uk)

#### **BACKGROUND DOCUMENTS:**

Appendix 1 – Revised Contaminated Land Strategy 2024

Appendix 2 – Equality Impact Assessment

[Current Contaminated Land Strategy](#)

[Environmental Protection Act 1990: Part 2A - Contaminated Land Statutory Guidance \(publishing.service.gov.uk\)](#)

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# Revised Contaminated Land Strategy

## Environmental Protection Act 1990, Part IIA

### Executive Summary

Across Arun's district, there are a significant number of sites that may be contaminated by their historical or current use. Part IIA of the Environmental Protection Act 1990 came into force in the United Kingdom in April 2000 and outlines how local authorities must deal with contaminated land that lies within their jurisdiction. The provisions require local authorities to develop and publish a strategy that details the manner in which they will inspect their area for contaminated land. Arun District Council's first Contaminated Land Strategy provided an overview of the contaminated land regime and indicated how the regime would be implemented, taking into consideration the various characteristics of the district. The strategy was first published in 2001 and has now been reviewed and revised in line with updated Statutory Guidance (DEFRA, April 2012). The revised strategy outlines how Arun District Council intends to implement the contaminated land regime across the district, in parallel with the latest guidance, resources and experience.

### Consultation Summary

This document is the revised Arun District Council Contaminated Land strategy which has been finalised following consultation with statutory consultees (listed on page 16). This strategy was approved by the Environment Committee on 19 March 2024. This strategy is publicly available on Arun District Council's website.

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## 1. Introduction

Contaminated land is regulated by Part IIA of the Environmental Protection Act, 1990. Under this legislation, local authorities are required to prepare, implement and review a Contaminated Land Strategy. Sites which are determined as contaminated land are also required to be published in a public register.

Contaminated land is defined in Part IIA of the Environmental Protection Act 1990 as:

‘any land which appears to the local authority in whose area the land is situated, to be in such a condition by reason of substances in, on or under the land that (a) significant harm is being caused or there is significant possibility of such harm being caused or (b) pollution of controlled waters is being caused or there is a significant possibility of such pollution being caused’.

Statutory Guidance published in 2012 by the Department for the Environment, Food and Rural Affairs (DEFRA) contains definitions of ‘significant harm’, ‘significant possibility’ and ‘pollution to controlled waters is being caused’. The guidance also introduces the concept of the pollutant linkage. For land to be determined as contaminated, there must be a significant pollutant linkage present. A pollutant linkage is where the source of pollution is connected to a receptor by a pathway so as to give rise to significant harm. It should be noted that a site may have multiple pollutant linkages. If such pollutant linkages are not adequately addressed, they can pose a threat to human health, the natural environment and the built environment. The contaminated land legislation is designed to

complement existing controls under the planning and development processes, by allowing local authorities to inspect, identify, assess and prioritise potentially contaminated land. These assessments will assist in meeting Government target for 60% of new homes in the United Kingdom to be located on previously developed, brownfield sites.

## 2. Aims and Objectives

This revised strategy details how Arun District Council ('the council') intends to meet its statutory duties to inspect its area for contaminated land, as outlined in the Contaminated Land Statutory Guidance (DEFRA, April 2012). This strategy should be read in conjunction with the aforementioned statutory guidance, which contains specific legal and scientific information. This strategy reflects the financial and resource-based constraints faced by the council.

The Contaminated Land (England) (Amendment) Regulations 2012 require local authorities to:

- inspect its area to identify potentially contaminated land
- use a risk assessment to determine whether a specific site meets the legal definition of contaminated land
- notify any affected person and the Environment Agency (EA) if contaminated land is determined
- in consultation with the Environment Agency, decide whether any particular site should be categorised as a Special Site
- establish what remediation should be undertaken, either on a voluntary basis or by formal notification
- identify the appropriate person and after consultation, formally require them to take responsibility for the remediation
- take enforcement action against any person who fails to comply with a formal notice
- exercise its power to carry out remediation and recover the associated cost
- maintain a public register of land that has been determined as contaminated.

When undertaking any of the above, the local authority must act in accordance with the Environmental Protection Act 1990, secondary regulations (for example, the Contaminated Land Regulations 2012), statutory guidance issued by the Secretary of State and any other relevant best practice guidance.

### 2.1 Aims

The council's aims are provided below:

- identify potential and actual contaminated sites within the district using rational, ordered and efficient investigation
- remove unacceptable risks to human health and the environment

- seek investigation and remediation through the planning system
- carry out detailed inspection of urgent sites where there is, or there is likely to be, significant possibility of significant harm occurring
- prevent the creation of new contaminated sites
- reinforce a 'suitable for use' approach
- ensure that burdens faced by individuals, companies and the community are proportionate, manageable and compatible with the principles of sustainable development.

## 2.2 Objectives

The overall objective is to provide an effective and efficient system for the identification and remediation of land where contamination is causing an unacceptable risk to human health and/or the wider environment. Assessment of each site will consider the current use and circumstances of the land and seek to prevent the creation of new contaminated sites. In order to ensure the aims of this strategy are met, the following objectives have been identified:

- assume that land is not contaminated unless there is reason to consider otherwise
- utilise the development control/planning system as the predominant mechanism for the investigation and remediation of land that is affected by contamination
- deploy Part IIA only in the absence of an appropriate, alternative solution
- refer any issues or allegations relating to radioactivity on land to the Environment Agency
- utilise powers of entry under Section 108 of the Environment Act 1995 only when the council is satisfied that there is a reasonable possibility that a significant pollutant linkage exists
- where appropriate, encourage voluntary remediation of sites
- detailed inspection will not be undertaken on sites where planning permission exists or is understood to be imminent, unless there is substantial evidence that the land is contaminated
- maintain appropriate records, including the public register
- continue the process of strategic inspection across the district
- continue to prioritise sites for detailed inspection
- consult with landowners and identified stakeholders prior to conducting detailed inspection of their land
- when remediation is undertaken by the council on behalf of another entity and liable parties have been identified, the council will pursue the appropriate person(s) for the cost associated with the apportioned share of the liability, in accordance with the statutory guidance
- communicate in an appropriate manner and if necessary, use non-technical language

- when a Special Site is identified, the council will request in writing that the EA conducts a detailed inspection of the site
- when a site is determined as contaminated land, the council will include information concerning its associated regulatory action on the public register.

The implementation of this strategy operates in tandem with the council's overarching strategies and priorities. It will work alongside existing policies, such as the National Planning Policy Framework (NPPF) to aid the efficient and effective delivery of these commitments by supporting the regeneration of brownfield land and encourage development. This will assist the council in meeting the Government's target for redevelopment of brownfield sites; simultaneously, promotion of brownfield development protects important greenfield sites.

## 3. Arun's District

### 3.1 Area Overview

Across the United Kingdom, there are marked differences in geography, industrial activity and the prevalence of vulnerable receptors, such as protected wildlife and water resources. The manner in which contaminants are deposited, move and affect (or threaten to affect) receptors can vary between proximate localities. The character of the district has been considered when developing priorities, aims and objectives for inspecting land that may be contaminated.

### 3.2 Location

Arun's district is situated in the middle of the West Sussex coastal plain, which stretches between the counties of East Sussex in the east and Hampshire in the west.

Arun has an area of approximately 85 square miles and is bordered by the South Downs to the north and 14.5 miles of coastline to the south. Notable boundary settlements include Houghton (north), Findon (east) and Pagham (west). The River Arun joins the English Channel at Littlehampton and its course roughly divides the district in half. The district includes three main Rifes at Aldingbourne, Felpham and Ferring. Over two-thirds of the district is in agricultural use, including pasture for cattle on the flood plains of the Arun Valley, while the steeper slopes are utilised for arable farming and rough grazing. Arun is home to 20 local wildlife sites; areas of land that are especially important for their wildlife. These locations are some of our most valuable wildlife areas.

### 3.3 Protected Locations

#### 3.3.1 Site of Special Scientific Interest (SSSI)

There are nine Site of Special Scientific Interest (SSSI) designations in Arun and these are determined by English Nature. The SSSIs are Arun Banks, Fairmile Bottom, part of Chanctonbury Hill, Arundel Park, part of Cissbury Ring, Climping Beach, Felpham, Bognor Reef and part of Pagham Harbour. Bognor Reef and Felpham Reef are SSSI for their geological value.

### 3.3.2 Local Nature Reserve (LNR)

Arun's first Local Nature Reserve (LNR) was declared in 1995 at the sand dunes of Littlehampton's West Beach. Three more nature reserves exist at Fairmile Bottom in Madehurst, Bersted Brooks in Shripney (created in 2010) and at Pagham Harbour. The council's Parks and Greenspaces Service manages West Beach and Bersted Brooks.

### 3.3.3 South Downs National Park

Almost half of the district is included within the South Downs Area of Outstanding Natural Beauty (South Downs AONB) and the South Downs National Park (SDNP). The SDNP is England's newest national park, designated in March 2010 and covering 1,627km<sup>2</sup> between Eastbourne in East Sussex and Winchester in Hampshire.

### 3.3.4 Conservation Areas and Sites of Nature Conservation Importance (SNCI)

In total, Arun boasts 29 Conservation Areas, in addition to nine Sites of Nature Conservation Interest (SNCI), which are determined by West Sussex County Council as being of nation-wide importance.

### 3.3.5 Pagham Harbour

Pagham Harbour is a particularly important area; it is a nature reserve, has SSSI status and its importance within Europe as an essential wild bird site was confirmed by a designation as a Special Protection Area (SPA) under EC Directive 79/409 for the conservation of wild birds. Furthermore, its international importance as a site for wetfowl is recognised in its Ramsar designation for Convention on Wetlands of International Importance.

### 3.3.6 Marine Conservation Areas

Pagham Harbour, Selsey Bill and the Hounds and Kingmere are the three Marine Conservation Areas within Arun's district.

## **3.4 Water Resources**

The River Arun has a significant impact on the environment of the district; the Arun Valley is of great ecological importance, providing important wetland and lowland habitats which support several rare species of flora and fauna.

There are currently 22 registered private water supplies, with 15 being from boreholes, six from a public supply and one from springs.

## **3.5 Geology**

Ordnance Survey Sheets 317 and 332 show that the geology underlying the coastline between Worthing and Bognor Regis is of upper chalk, which is the same formation as that of the South Downs. Between Patching and Chichester are belts of Woolwich and



Reading Beds and London Clay. The overlying drift between Kingston and Pagham and between Poling and Aldingbourne is Brickearth with Gravel, whilst the Arun Valley is predominantly Alluvium.

### **3.6 Hydrogeology**

Groundwater plays a fundamental role in the environment. It provides over one-third of our drinking water and maintains the flow in many of our surface waterways, such as rivers and streams. In some areas of southern England, groundwater accounts for 80% of drinking water. The protection of groundwater is the responsibility of the EA and this strategy takes into account potential impacts on groundwater reserves from contaminated land.

The EA has statutory responsibility to protect groundwater reserves in England and Wales; their Groundwater Protection: Policy and Practice (GP3) document provides a framework to allow the EA to achieve this. GP3 works alongside defined groundwater Source Protection Zones (SPZ) in order to identify and protect sensitive groundwater resources. GP3 classifies the underlying strata of England and Wales into aquifers of varying sensitivity and defines an aquifer as ‘a sub-surface layer or layers of rock or other geological strata of sufficient porosity and permeability to allow either a significant flow of groundwater or the abstraction of significant quantities of groundwater’. The aquifers are further classified into principal, secondary, secondary undifferentiated and unproductive, depending on their potential for exploitation as potable water supplies. The majority of Arun’s district is classed as principal with secondary elsewhere. SPZ are defined as the parts of the aquifer which are considered to form the catchment to public water supplies and some types of private supply. SPZ relate purely to groundwater flow below the water table and the SPZ maps show the position of each source, whilst representing a precautionary approach to the protection of groundwater.

The permeable chalk geology underlying the majority of Arun’s district, holds vast volumes of groundwater that supplies drinking water to the local population. A number of public water supply abstraction points are located within the district, some of which lie within SPZs.

### **3.7 Population Distribution**

According to the most recent Census (2021), Arun had a population of almost 165,000; an increase of 10.3% since the 2011 Census was conducted. West Sussex has total population of approximately 882,700 with Arun being the largest of the seven boroughs and districts within the county. During the summer, Arun’s population increases notably due to seasonal employment and tourism. Table 1 (overleaf) shows Arun’s population according to Ward, based on information from the Office for National Statistics – Census 2021.

<b>Ward</b>	<b>Population (rounded to nearest 100 people)</b>
Aldwick East	5,200
Aldwick West	6,300
Angmering and Findon	10,800
Arundel and Walberton	8,400
Barnham	9,200
Beach (Littlehampton)	4,700
Bersted	10,200
Brookfield (Littlehampton)	6,300
Courtwick with Toddington (Wick)	11,800
East Preston	7,800
Felpham East	6,000
Felpham West	6,300
Ferring	4,900
Hotham (Bognor Regis)	6,100
Marine (Bognor Regis)	7,200
Middleton-on-Sea	4,900
Orchard (Bognor Regis)	6,800
Pagham	6,400
Pevensey (Bognor Regis)	5,600
River (Littlehampton)	9,500
Rustington East	5,400
Rustington West	8,300
Yapton	6,900

*Table 1: Arun's population according to Ward, based on information from the Office for National Statistics.*

Generally, the majority of settlements in the north of the district are smaller (fewer than 1000 people) than those located further south (typically between 1000 – 5000 people). The district has three main towns at Arundel, Bognor Regis and Littlehampton. The urban areas of Littlehampton and Bognor Regis lie respectively on the east and west sides of the River Arun, emphasising the districts geographical split in population. Bognor Regis gained popularity as a seaside resort during the early 19<sup>th</sup> Century, due to the desirable 'new' pastime of sea water bathing. As the town expanded, several smaller peripheral settlements were enveloped to form the urban centre as it now appears. Littlehampton's origins stem from port activities and associated trades. A small number of fishing vessels still launch from the town. In more recent years, the town has seen an increase in its reputation as a seaside resort. The unique skyline of historic Arundel dominates views of the Arun Valley. Arundel and its 11<sup>th</sup> Century castle are situated at the foot of the South Downs and surrounded by countryside which makes the town an ever-popular tourist destination. Small, rural town and villages are interspersed throughout the remaining countryside. There are almost 67,000 households in Arun, of which 73.8% are owner-occupied, 15.3% are privately rented, 0.8% are in shared ownership (part owned and part rented), 8.8% are social rented with 1.2% living rent free.

### 3.8 Industrial Influence

Arun's district contains a number of relatively small sites which, due to their historic and/or current use, may be a source of contamination. This may include, for example, land formerly used as blacksmith's yards, current vehicle refuelling stations and old brickworks. Historically, Littlehampton was a hub for shipbuilding, ironworks and brickworks with the River Arun providing an essential route for trade and transport of goods. The majority of sites along the banks of the river have been remediated. The following industries have been identified as potentially contaminative uses and are provided only for context. The industries listed are typical to the area and does not form an exhaustive dataset. Full reference should be made to relevant guidance documents for specific detail.

#### 3.8.1 Littlehampton Port

Ironworks, ship building and rope making extended along the river during the 19<sup>th</sup> century and into the mid-20<sup>th</sup> century. Most of these sites have been redeveloped. Shipbuilding along the quayside has existed for the last 300 years and continues on the western banks of the river.

#### 3.8.2 Former Gas Works and Brickworks

A number of former gas works and brickworks exist within Arun's district. Production of town gas began in the middle of the 19<sup>th</sup> century and continued until the 1970's when natural gas supplies were introduced. In order to produce town gas, coal was heated in airless environment to separate its liquid and gaseous components. Prior to distribution, the gas was processed to remove impurities such as tar, ammonia and cyanides. The fluid portion contained tars and liquid ammonia. These substances may have contaminated the land at gas working sites.

Some areas within Arun's district overlie a geological layer called Brickearth. As the name implies, this layer of material is highly suitable for the construction of bricks. Some sites, usually referred to as brickworks or brickyards, housed long-term brick manufacturing industry that utilised kilns to fire bricks. Brickfields were typically temporary sites where clamp burning techniques were used to fire bricks. Brickmaking itself is not usually considered likely to have contaminated the land, however any activity which could result in excavations, for example, clay or brickearth extraction, are of particular interest as the land may have been infilled with unknown material.

#### 3.8.3 Ford Airfield

Heavily utilised by the Ministry of Defence (MoD) during World War One and World War Two, it is possible that the site may have been impacted by fuel, ordnance, oils and solvents. Ford Airfield now houses a number of industrial premises and a men's open prison.

### 3.8.4 Railway Land

Contamination from railway activities can occur through spillages of material being transported and spills or leaks of locomotive fuel, petroleum oils and other substances used for lubrication and hydraulics. Railway lines, sidings and goods and service yards may also have received concentrated applications of pesticides and/or de-icing solutions.

### 3.8.5 Environmental Permitting

Under the Environmental Permitting (England and Wales) Regulations 2016, the council authorises various processes to operate in the district, details of which can be found in the online public health register: [Arun | Environmental Health Online Services Login](#).

The Environment Agency holds their own public register: [Environmental Permitting Regulations – Installations \(data.gov.uk\)](#).

### 3.8.5 Landfills and Landraises

Landfills and landraises are generally described as sites where waste material is deposited for final disposal. These sites are important because the decomposition of waste material produces gases and leachate. Landfills are typically depressions below ground level which are infilled with waste material, whereas landraises are sites where waste material is piled on top of the ground. Landfills are the most popular route of disposal for waste material in the United Kingdom. According to WSCC data, there are no longer any open, operational landfills in West Sussex. Any waste that requires landfill disposal is sent to Redhill landfill site in Surrey. WSCC does not record any closed landfills in Arun's district, although a number of former (historic) landfills are known. There are no known landraisings within Arun's district.

Historically, landfills were not closely regulated and many informal sites were utilised by local communities. Frequently, the landfill areas were not lined to prevent leachate escaping or vented to control gas escaping. In addition, the material being deposited within the landfill was not controlled. The construction, operation, maintenance and decommissioning of landfills is now tightly regulated. Landfill gas is usually composed of varying concentrations of methane and carbon dioxide. In certain concentrations and in certain conditions, landfill gas can present an explosive risk. Leachate is the liquid product of decomposition and its composition will depend on the waste material in the landfill. Leachate often contains toxic substances which can affect surface and groundwater. Landfill gas and leachate have the ability to migrate off site and affect neighbouring land.

## **3.9 Key Property Types**

There are 971 listed buildings in Arun, of which 48 are classed as Grade I or Grade II\*. There are also 923 Grade II listed buildings in the district. The number of Scheduled Monuments totals 41, with Littlehampton Fort being classified as a Scheduled Monument at Risk. Flint Mine at Findon Place has the same designation, however it lies within the SDNP's administrative area and is therefore not managed by the council. Blakes Cottage

in Felpham and St. Mary's in Littlehampton are recorded as buildings at risk. The Church of St. Nicholas in Arundel is also a building at risk and this is within the SDNP's planning jurisdiction. It should be noted that planning responsibilities across the Arun District is divided between the council's local planning authority area and the SDNP's planning team.

### **3.10 Council-owned Land**

ADC owns buildings across the district, including its own housing stock. Land holdings include agricultural land, industrial sites and a significant number of car parks, in addition to open spaces, recreational grounds, allotments and five cemeteries. ADC owns or operates 352 areas of public open space over approximately 245 hectares, of which 71 are children's play areas, skate parks and games areas. Other parks across the district are in private ownership or owned by Town and Parish Councils.

### **3.11 Known Information on Contamination**

The council holds some information concerning potentially contaminated land within the area. These data are predominantly from the initial desk-top assessments carried out by the council and from reports undertaken by third parties and submitted through the planning process. The information has been amalgamated to create a digital Geographical Information System (GIS) which is utilised for consulting on planning applications and in the decision making process regarding prioritisation and inspection of potentially contaminated sites.

A contaminated land register has been publicly available since 2000. There are currently no entries on the register, however the register does not include sites which are potentially contaminated.

## **4. Current and Future Work, including voluntary remediation, the public register and investigating reports of potential contamination**

### **4.1 Current work**

The council's database holds records of 457 potentially contaminated sites across Arun's district. Sites identified as low or medium risk, the majority of which are currently occupied by commercial or industrial enterprises, will not be further investigated unless they are put forward for redevelopment or new, relevant information is identified.

The council continues to be represented at the Chartered Institute of Environmental Health (CIEH) Sussex Pollution Group and at the CIEH Sussex Contaminated Land sub-group. The latter was developed to ensure compliance with the legislation, encourage consistency across local authorities in East and West Sussex and promote best practice.

## 4.2 Future work

The statutory guidance requires the council to continue to identify and prioritise sites that may be potentially contaminated, followed by producing detailed inspections of sites where the need for further investigation has been identified. The council's current database and associated GIS mapping form a basic provision of this requirement, however these systems are dis-jointed and not easily updated. Consequently, it is proposed to migrate existing data from the unsupported database to the current online system and then ensure the data are mapped either within the online system or in the GIS. It is anticipated that this phase of upgrade will be completed using existing capacity within the Environmental Health team.

Following completion of this undertaking, risk-based software will be able to reprioritise the sites and produce a list of sites for detailed inspection, prioritised according to the potential risk to receptors. This targeted approach will allow effective and appropriate deployment of the council's resources.

## 4.3 Voluntary Remediation

It is inevitable that some residents in Arun's district live on or near to land which is potentially contaminated. Households in this category may wish to engage the services of a suitably qualified, independent professional to produce a risk assessment for their property, in particular when conveyancing. When requested, the council will review risk assessment reports and provide a written response to the resident. If the risk assessment is approved by the council, the database and associated risk rating will be updated in accordance with the risk assessment report.

## 4.4 Public Register

Section 78R of the Environmental Protection Act 1990 requires local authorities to hold and maintain public registers of all regulatory action taken under Part IIA across their districts. The registers are not lists of contaminated land within each district; they are records of sites where land has been formally determined as contaminated. Arun's register is managed by the Environmental Health Service and is available online: [Arun | Environmental Health Online Services Login](#). At present, there are no entries of formally determined contaminated land or special sites on the register, however it should be noted that the register does not include sites which are potentially contaminated.

## 4.5 Investigating Reports of Potential Contamination

In the event that justified reports are received, identifying land that is contaminated or has been contaminated, an investigation will be conducted in line with our service standards. It is anticipated that the matter will be resolved either through direct action as a result of the investigation (for example, either by providing advice or taking enforcement action), or by updating and reprioritising the council's database.

## 5. Special Sites

Special Sites are areas that meet a specific set of circumstances and are usually where the main receptor is a controlled water, such as a river or an aquifer. Typically, Special Sites have had uses where the Environment Agency is likely to have already had a regulatory responsibility, for example, nuclear sites, MoD areas, oil refineries and sites that may be causing pollution of drinking water reserves.

In the event that the council identifies a Special Site, a request is made to the EA to take over as the lead authority. The statutory guidance details the precise mechanism for such requests. The council will continue to work with the EA throughout the investigation and remediation phases, as required.

## 6. Benefits of the Strategy

The information collated during the initial prioritisation exercise has provided specialist officers of the council with a database and associated mapping facility relating to potentially contaminated land. It is recognised that this dataset required reviewing and updating and once complete, this will ensure that the council is able to focus its resources on the highest risk sites. The council will also be able to provide responses of greater detail when presented with Environmental Information Requests (EIR).

## 7. Measuring our Progress

Each year, it is anticipated that more detailed knowledge of sites will be added to the database using existing resources. This increased pool of information will enable the council to refine and prioritise sites whilst reducing the number of sites that require investigating and clearly identify sites that require urgent detailed investigation.

## 8. Interaction with the Planning System

The concept that potentially contaminated land must be demonstrated to be suitable for its current or intended use is promoted within the relevant statutory guidance and the National Planning Policy Framework (NPPF). As a minimum, the land in question should be remediated to a standard where significant harm or pollution of controlled waters cannot occur. Consequently, the site is unable to be determined as contaminated land as defined in Part IIA of the Environmental Protection Act 1990.

The council expects that any planning application for land which may be affected by contamination to be accompanied by a desktop/Phase I report that meets the definition provided in British Standard BS10175:2011 'Investigation of potentially contaminated sites – Code of Practice' (updated in 2017). Valid reports will be completed by an independent and suitably qualified person, as defined in Annex 2 of the NPPF. Further guidance on investigating potentially contaminated land is available at the following link: [Land contamination risk management \(LCRM\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/land-contamination-risk-management-lcrm).

## 9. Summary

The council has identified and prioritised numerous potentially contaminated sites, the majority of which are low or medium risk commercial sites which will not be further investigated unless redeveloped. The existing database requires an extensive review to ensure all information has been transferred into the Environmental Health database and is available in the corporate mapping system. Once complete, the reprioritisation and associated investigation of sites will be conducted, with detailed investigations carried out according to a risk-based priority, starting with the highest risk sites. The council will continue to provide support for those commissioning investigations on private land. The council will work with residents to ensure that they are informed of any site investigation and remediation that affects them. The council will try to hold previous polluters and/or developers accountable and responsible for any remediation. Where this is not possible, residents will be required to contribute and a hardship policy may be used to ensure this is as proportionate and as fair as possible. Reports of potentially contaminated land will be investigated and the appropriate action will be taken.

## Glossary

The following is a non-technical explanation of terms and acronyms used within this document. For precise definitions, reference should be made to the relevant source document (e.g. statutory guidance).

<b>Term or Acronym</b>	<b>Definition</b>
ADC/the council	Arun District Council.
Appropriate person	A person who is determined to have responsibility for conducting remediation work and bearing the cost of the work.
Brownfield land	Previously developed land.
C4SL	Category 4 Screening Level. These are levels below which land is not considered capable of being determined as contaminated.
CIEH	Chartered Institute of Environmental Health.
CLEA	Contaminated Land Exposure assessment. An assessment tool for considering risks to human health.
CLR	Contaminated Land Report. A series of reports from the (then) Department for Environment, Food and Rural Affairs and the Environment Agency, assessing the risk to human health from land contamination.
Contaminant	A substance that is in, on or under the land and has the potential to cause harm or to cause pollution of controlled water.
Contaminated land	Any land that appears to the local authority in whose area it is situated to be in such a condition by reason of substances in, on or under the land, that significant harm is being caused or there is a significant possibility of such



	harm being caused or pollution of controlled water is being, or is likely to be, caused.
Controlled water	These include inland waters (rivers, streams, underground streams, canals, lakes, reservoirs), groundwater (any water in underground strata, wells or boreholes), territorial waters (seawater within the three mile limit), coastal waters (the sea up to the line of highest tide and tidal waters within the freshwater limit).
DEFRA	Department for Environment, Food and Rural Affairs
EA	Environment Agency
Ecosystem	A biological system of interacting organisms and their physical environment.
EIR	Environmental Information Request.
EPA/EPA 1990	Environmental Protection Act 1990
GIS	Geographical Information System. A storage and retrieval database, capable of being interrogated on any level of pre-determined parameters.
Greenfield land	Land which has not been previously developed.
Groundwater	Any water contained in underground strata, wells or boreholes.
LNR	Local Nature Reserve.
MoD	Ministry of Defence.
NPPF	National Planning Policy Framework.
Part IIA	Part IIA of the Environmental Protection Act 1990, inserted by section 57 of the Environment Act 1995.
Pathway	The route or routes by which a receptor can become exposed to a contaminant.
Pollutant linkage	The relationship between a source, pathway and receptor.
Ramsar	Designation of internationally important wetland sites.
Receptor	Something that could be affected by contamination (e.g. water, human health, ecosystem, property).
Remediation	The carrying out of works to prevent or minimise the effects of contamination. It can include ongoing monitoring work.
Risk assessment	The study of probability of a hazard occurring and the magnitude of the consequences.
SDNP	South Downs National Park.
Source	A substance in, on or under the land which has the ability to cause harm.
SNCI	Site of Nature Conservation Interest.
SPA	Special Protection Area.
SPZ	Source Protection Zones. Areas around groundwater abstraction points utilised for public water supply, within which certain activities and/or processes are either restricted or prohibited.

Special Sites	Any contaminated land designated as ‘special’ in accordance with the criteria specified in the Contaminated Land (England) Regulations 2006.
SSSI	Sit of Special Scientific Interest.
Statutory Guidance	In this strategy, this refers to the Statutory Guidance document published by DEFRA in April 2012.

## Consultation Recipients

The council is obliged to consult specific organisations on its draft revised contaminated land strategy. The public authorities consulted for this strategy are as follows:

- Arun District Council’s Planning service (internal)
- Arun District Council’s Property and Estates service (internal)
- Environment Agency (Solent and South Downs)
- Natural England
- Historic England (London and South-east Regional Team)
- South Downs National Park Authority
- West Sussex County Council (Public Health)
- UK Health Security Agency
- Neighbouring local authorities – Chichester District Council, Horsham District Council, Worthing Borough Council.

## Appendix 1

### Significant changes since the publication of Arun District Council’s Contaminated Land Strategy in 2001

#### Part IIA – new statutory guidance

In April 2012, revised statutory guidance on the contaminated land regime under Part IIA of the Environmental Protection Act 1990 was published by the Department for Environment, Food and Rural Affairs (DEFRA). The new guidance supersedes previous publications and aims to provide greater clarity to regulators in determining whether land is contaminated. The most significant change is that the new guidance introduces a four-category system to assist local authorities determine whether land is contaminated. The system is based on whether the land presents a significant possibility of significant harm to human health and sets out a framework for decision making. Category 1 sites are clearly contaminated and represent a high risk, whereas Category 4 sites are evidently low risk and do not qualify as contaminated land. Category 2 sites require further risk assessment under the Part IIA regime whereas Category 3 sites will only be subject to further assessment through the planning system (e.g. triggered by proposed redevelopment or change of use, etc.). Technical guidance to support the revised statutory guidance introduced Category 4 Screening Levels (C4SL) that represent generic screening levels for a range of common contaminants. The C4SL are precautionary but more pragmatic than Generic Assessment Criteria (GAC), soil guideline values (SGV)

and other screening levels. GAC and SGV remain in use for substances that have not been assigned a C4SL. It should be noted that the revised statutory guidance does not relate to land contaminated with radioactive substances. Separate statutory guidance for radioactive sites exists and the enforcing authority for such sites is likely to be the Environment Agency.

### Part IIA – radon amendment

In September 2010, an amendment to Part IIA came into force that redefines the term ‘substance’ in relation to radioactive contaminated land. This amendment removed the exclusion for radon and its products of decay; consequently, regulators are now able to take action where a radiological emergency or past activity has left radon-impacted land (e.g. through the use of radium-luminous paint). Naturally occurring radon remains beyond the scope of the regime.

### National Planning Policy Framework

In March 2012, the National Planning Policy Framework (NPPF) was published. The NPPF streamlined several separate technical guidance documents into a single comprehensive resource, including legislative and technical guidance in relation to redeveloping land affected by contamination. The NPPF, which was most recently revised in December 2023, outlines the government’s planning policies and details the expected application of these policies. A key principle of the NPPF is a presumption in favour of sustainable development, in particular, encouraging the redevelopment of brownfield sites, providing they are not of high environmental value. The NPPF states that planning policies and decisions should ensure that the proposed development is appropriate for the location and that the landowner and/or developer is responsible for securing the safe development of the land. As a minimum, land should not be capable of being determined as contaminated after it has been through the planning process.

### South Downs National Park

In March 2010, the South Downs became the tenth National Park to be designated in England. The South Downs National Park (SDNP) extends over 1600 km<sup>2</sup>, stretching for over 160 kilometres between Beachy Head (East Sussex) and Winchester (Hampshire). The SDNP covers a significant and rural area along the northern edge of Arun’s district.

### Aquifers

Since April 2010, the EA’s Groundwater Protection Policy has utilised aquifer designations that are consistent with the Water Framework Directive. These designations reflect the importance of aquifers in relation to groundwater reserves and their role in supporting surface water flows and wetland ecosystems. The aquifer designations (listed below) are based on geological mapping data from the British Geological Survey:

- Principal aquifer – highly permeable, previously classed as ‘major aquifers’

- Secondary aquifers – variably permeable, subdivided into Secondary A aquifers (formerly classed as ‘minor aquifers’) and Secondary B aquifers (usually water-bearing parts of previously classified ‘non-aquifers’)
- Secondary Undifferentiated – typically the layer in question has previously been classified as minor and non-aquifer due to the variable geological characteristics in different locations.
- Unproductive strata – negligibly permeable.

<b>Table of Amendments</b>			
<b>Amendment number</b>	<b>Page number(s)</b>	<b>Details</b>	<b>Date</b>
1	Whole Strategy	Full review – for adoption by Environment Committee	19 March 2024
2			
3			
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5			

## EQUALITY IMPACT ASSESSMENT

<b>Name of activity:</b>	Contaminated Land Strategy	<b>Date Completed:</b>	29/01/2024
<b>Directorate / Division responsible for activity:</b>	Technical Services	<b>Lead Officer:</b>	Neil Williamson
<b>Existing Activity</b>	<input type="checkbox"/>	<b>New / Proposed Activity</b>	<input type="checkbox"/>
		<b>Changing / Updated Activity</b>	<input checked="" type="checkbox"/>

### What are the aims / main purposes of the activity?

Revised Contaminated Land Strategy

### What are the main actions and processes involved?

Seek approval for a revised Strategy which establishes priorities for contaminated land within Arun.

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

The residents and businesses. The other main stakeholders are internal services, such as planning, and external stakeholders including UKHSA, Defra/EA, WSCC Public Health and neighbouring local authorities.

### Have you already consulted on / researched the activity?

Consultation with stakeholders, this includes County and District Councils, West Sussex Public Health, Arun and SDNP Planning.

### 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
<b>Age</b> (older / younger people, children)	<b>Yes</b>	Positive impact – young children (0-6) are considered to be more sensitive to contaminated land and the strategy would have a positive impact on this group. However this does not mean that other groups receive lesser protection.
<b>Disability</b> (people with physical / sensory impairment or mental disability)	<b>No</b>	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.

<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	<b>No</b>	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
<b>Marriage &amp; civil partnership</b> (Marriage is defined as a 'union between a man and a woman'. Civil partnerships are legally recognized for same-sex couples)	<b>No</b>	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	<b>No</b>	Positive impact – there may be additional risks to unborn children and the very young (see above) and the strategy would have a positive impact on this group. However this does not mean that other groups receive lesser protection.
<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	<b>No</b>	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	<b>No</b>	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
<b>Sex</b> (male / female)	<b>No</b>	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
<b>Sexual orientation</b> (lesbian, gay, bisexual, heterosexual)	<b>No</b>	The Strategy relates to the condition of land. Decisions are made based upon levels of contamination in the ground. There is no evidence to suggest that the Strategy would have a potential impact on this characteristic.
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should be also considered	<b>Yes</b>	Negative impact – By determining land as contaminated the appropriate person will be required to fund remediation, wherever possible this will be the polluter or the developer. However, remediation costs could be significant depending on the levels of type of contamination and have the greatest impact on those at a socio-economic disadvantage.

**What evidence has been used to assess the likely impacts?**

Technical and public health knowledge of the Environmental Health team, and recognised sources of research.

**Decision following initial assessment**

**Continue with existing or introduce new / planned activity**

**Yes**

**Amend activity based on identified actions**

**Action Plan**

<b>Impact identified</b>	<b>Action required</b>	<b>Lead Officer</b>	<b>Deadline</b>
Age	None required. Strategy will have positive impact on this group.		
Social Economic Disadvantage	Ensure polluter or developer is required to remediated wherever possible.  The Strategy should minimise the risks to this group including - planning consultations responses, Environmental Information Requests, and review and prioritised inspection of potentially contaminated sites.	KG	Ongoing

**Monitoring & Review**

**Date of last review or Impact Assessment:**

n/a

**Date of next 12 month review:**

1 April 2025

**Date of next 3 year Impact Assessment (from the date of this EIA):**

1 April 2028

**Date EIA completed:**

29/1/2024

**Signed by Person Completing:**

N. Williamson



## Arun District Council

<b>REPORT TO:</b>	<b>Environment Committee 19 March 2023</b>
<b>SUBJECT:</b>	<b>Combined Cleansing Services Contract</b>
<b>LEAD OFFICER:</b>	<b>Joe Russell-Wells, Group Head Environment &amp; Climate Change/Oliver Handson, Environmental Services &amp; Strategy Manager</b>
<b>LEAD MEMBER:</b>	Cllr Sue Wallsgrove
<b>WARDS:</b>	<b>All</b>

**CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:**

**‘Supporting our environment to support us’**

Overall aims:

A) To consider climate change, sustainability, biodiversity and the environment in everything the Council is responsible for and encourage its community and local businesses to do the same

B) Protect and enhance our natural environment

C) Regularly review progress toward Arun's Carbon Neutral Strategy (2022-30) as set out in the annual Climate Action and Biodiversity Work Plan

How we will achieve this:

1) Working with our community improve waste reduction and recycling to meet future targets of 55% recycling rate by 2025 and 60% by 2030.

2) Ensure that climate change and sustainability is at the heart of all Council services

**Corporate indicators**

1) The level of public satisfied or very satisfied with the overall quality of the council's services

2) The level of customer satisfaction with the cleanliness of the District

3) CP12 - Number of missed refuse and recycling collections per 100,000 within contractual target (80 target)

4) CP 23 – Residual household waste per of household per annum (450 kg/hh target)

5) CP24 - Household waste sent for reuse, recycling and composting (50% current target)

**DIRECTORATE POLICY CONTEXT:**

Effective governance and management of key service contracts

**FINANCIAL SUMMARY:** The service recommendations in this report seek to minimise the future budgetary risk associated with the procurement and delivery of the CCSC. Current estimates indicate that the total capital costs will be £3,015,000, funded by DEFRA grants, external borrowing and contract savings. The total new revenue costs are expected to be £1,250,000 and DEFRA have indicated that these will also be

funded by a further grant. When ongoing DEFRA funding is received under the Extended Producer Responsibility scheme, which is expected to come into force in October 2025, the Council expects to be in a financially favourable position in comparison with current costs for the delivery of these services.

## **1. PURPOSE OF REPORT**

The purpose of this report is to outline and recommend the scope of services to be provided under a new Combined Cleansing Services Contract (CCSC) to meet the requirements of the Environment Act 2021 and the Government's 'Simpler recycling' reforms.

The report recommendations will enable the Council to deliver its corporate aims and objectives as outlined in the Council 'Vision 2022-2026' document and support achievement of the stated 2025 target rate for recycling of 55%

## **2. RECOMMENDATIONS**

2.1 It is recommended that the Environment Committee approves:

- a) The procurement of a new Combined Cleansing Services Contract based on the following changes to services provided under the contract:
  - i. A new weekly kerbside food waste collection with a supplied 5 litre internal caddie and 23 litre external caddie
  - ii. A fortnightly kerbside residual (refuse) waste collection from either a 240 litre or 180 litre wheeled bin
  - iii. Introduction of kerbside coffee pod, textiles and batteries collection services.
  - iv. The new service to commence from 1<sup>st</sup> February 2026.
  
- b) The inclusion of the following services as delivered under the current contract:
  - i. A fortnightly kerbside dry mixed recycling collection from a 240-litre bin.
  - ii. A fortnightly kerbside small waste electrical equipment items collection
  - iii. A fortnightly kerbside garden waste collection service (subscribers only)
  - iv. Street cleansing services
  - v. Public toilet cleaning
  - vi. A pay to use bulky waste collection service
  
- c) The award of the contract to the highest scoring bidder, based on the procurement strategy as set out in this report.
  
- d) Delegates authority to the Director of Environment & Communities to award the contract on the specified terms in accordance with the Council's Contract Standing Orders.

2.2 It is recommended that the Environment Committee notes:

- a) That the Group Head of Finance will approve and sign off a framework agreement for the procurement and roll out of residual bins and food waste caddies required to facilitate the new services.
- b) The principle of delivering the administration of garden waste subscriber services directly, based on the rationale provided in the report. The costs to providing this service will form part of a future budget report and will be offset through the commercial benefit of providing this service.
- c) That the procurement, scope and evaluation of this contract consists of:
  - i. An open tender procurement exercise.
  - ii. A contract term of an initial 8 years with an optional extension of up to a further 8 years.
  - iii. The tender evaluation strategy as set out in this report.

2.3 That the Environment Committee recommends to the Policy & Finance Committee that it recommends that Full Council approve:

- a) the addition of £1,820,000 to the Capital Programme in 2025/26 to fund the purchasing and delivery of food waste receptacles and purchasing of vehicles necessary to provide the weekly food waste collection service as part of the CCSC, to be funded by a grant received from DEFRA.
- b) the addition of £1.2 million to the Capital Programme in 2025/26 to procure and roll out either 180 or 240 litre residual bins for residents to facilitate a fortnightly residual collection service. This will be funded from borrowing if the Council is unable to secure further funding.

## **2. EXECUTIVE SUMMARY**

The current Combined Cleansing Service Contract (CCSC) expires on 31<sup>st</sup> January 2026. To successfully procure a new contract within this timeframe, a Committee decision is required now in order to inform the strategic direction and scope of the new CCSC.

## **3. DETAIL & BACKGROUND**

### **3.1 Current contract**

3.1.1 The Combined Cleansing Services Contract provides waste collection & street cleansing services for the District. The current contract with Biffa is part way through a three-year extension which ends on the 31<sup>st</sup> January 2026. The Environment Committee agreed this extension on the 19<sup>th</sup> May 2022. In line with the Council's standing orders and procurement legislation a new contract must be procured to commence on 1<sup>st</sup> February 2026.

3.1.2 The current contract provides:

- A weekly residual kerbside waste collection from sacks
- A fortnightly dry mixed recycling kerbside collection from a 240 litre bin
- A fortnightly subscriber based kerbside garden waste collection from a 240 litre bin and the administration of the subscriber service
- A fortnightly kerbside collection of small waste electrical items
- A pay to use bulky waste collection service
- Street cleansing services which include public toilet cleansing, street litter and street litter bin and dog waste bin emptying

N.B the Council operates a free to use subscriber based clinical waste collection service. This operates under a separate countywide framework contract and does not form part of the CCSC or this recommendations in this report.

3.1.3 The Council's most recent confirmed annual recycling rate is 42.93% of which approximately 25.33% is dry mixed recycling and 17.60% is garden waste.

### **3.2 'Simpler recycling' & the move to food waste collections**

3.2.1 In November 2023 the Government announced a series of measures to promote 'Simpler recycling' reforms for households and businesses introduced through the Environment Act 2021 (see 4. background papers). The most significant requirement of this announcement was that all Councils will need to introduce a weekly food waste collection service for all households from 1<sup>st</sup> April 2026.

3.2.2 In January 2024 the Department for the Environment, Food and Rural Affairs (DEFRA) provided details for the capital and ongoing revenue financial support it would provide for local authorities to introduce food waste collections (see Appendix 1). Arun were awarded £1,665,840, which is an accurate reflection of the likely capital costs (vehicles and receptacles) for introducing this service based on current cost modelling.

3.2.3 At their meeting on the 19<sup>th</sup> May 2022, Members of the Environment Committee agreed to the principle of introducing a weekly food waste collection and moving to a fortnightly residual collection from a supplied bin in the current contract – should clarity be provided by government and funding confirmed. The requirement for implementation and timing of weekly food waste collections now sits neatly alongside the procurement of a new CCSC to start from 1<sup>st</sup> Feb 2026.

### **3.3 Recommendations for services provided under a new CCSC**

3.3.1 To deliver on aims and objectives of the Council's own corporate Vision and targets for recycling rates of 55% by 2025 and government mandate to introduce food waste collections from March 2026, the following service specifications are recommended to form part of the Council's CCSC service procurement:

1. The introduction of a weekly kerbside food waste collection (internal 5 litre caddy, external 23 litre caddy as used in the 1-2-3 trial)
2. The move to a fortnightly kerbside residual waste collection from either a 180 litre or 240 litre bin to be provided
3. Continuation of a fortnightly dry mixed recycling kerbside collection from a 240 litre bin

4. A fortnightly kerbside garden waste collection only, with in house administration of subscriber based services (see business case in Appendix 2)
5. Continuation of a current fortnightly kerbside small waste electrical items collection
6. Provision of a new market led 'podback' collection service
7. Continuation of a pay to use bulky waste collection service
8. Street cleansing services with no discernible change, but specifications updated in line with current legislation/guidelines and local needs

3.3.2 The contract will include the obligation to collect coffee pods through the 'Podback' recycling scheme, textiles, and batteries. The Specification will mandate bidders to propose collection solutions that are cost-effective and ensure the retrieval of high-quality goods in accordance with Health and Safety protocols.

3.3.3 Arun will be working alongside West Sussex County Council (WSSCC) as the disposal authority to introduce solutions to soft plastic recycling which will be required in future years. This will take significant volume of waste out of the residual stream.

3.3.4 Depot space will continue to be provided through a lease at market rent at the Council's depot in Harwood Road Littlehampton. The depot is conveniently located for services across the district and close to the Ford Materials Recycling Facility (MRF). The vast majority of staff employed on the contract either walk or cycle to work to ensure a low carbon footprint and local employment base/social value. The depot is currently undergoing improvements and expansion funded through the current contract to facilitate the need for food waste collection services. Delegated Authority is with the Group Head of Technical Services to enter into this lease. If the Council did not offer this facility the cost of the successful contractor providing a new depot facility would cost an estimated £6 million pounds.

### **3.4 Procurement, market engagement and tender evaluation**

3.4.1 With the support of Hampshire County Council's procurement lead, an early market engagement exercise was undertaken which sought industry guidance to inform key elements of the services and scope of the contract. This included;

- Term of the contract
- Bin size/containerisation option
- Achieving recycling targets
- Delivering food waste collections
- Vehicle, fleet & fuel options
- Key performance indicators
- Financial modelling
- Mobilisation requirements
- Social value

Four of the main recognised industry providers responded to the market engagement. Recommendations within this report are supported by the results of this exercise.

3.4.2 In summary, the principle aim of this contract procurement is securing the best deal which balances the Council's financial position, delivers the mandate from

government, enhances the Council's green agenda and continues to deliver a good service for residents.

The procurement strategy is to acquire the most economically advantageous bid from the market, based on alignment with the Council's strategies and on commercial information gleaned from a market engagement exercise. All of which need to align with the procurement contract regulations.

3.4.3 The procurement will be an open tender in line with procurement regulations and the Council's standing orders, with technical requirements and price evaluated to ensure costs are driven down and quality outcomes driven up. Quality areas being included and evaluated are staffing, vehicles, recruitment and retention, environmental initiatives and awareness, reporting and partnership working, service delivery and involvement and alignment with local strategies, which are in addition to health and safety and other regulatory requirements. Costing models are being explored with Hampshire CC procurement to ensure that the best value for money is obtained.

3.4.4 Due to the nature of the contract and potential contract length, consideration will need to be made around potential changes in requirements throughout the term of the contract so flexibilities will need to be factored into the specification and contract terms.

### **3.5 Financial implications**

3.5.1 The CCSC is a high value contract of currently £8 million per annum. With any contract procurement there is a potential risk to the Council in respect of these costs escalating. To minimise this risk, the service recommendations and procurement strategy for this contract outlined 3.4.2 above will seek to balance quality of service vs price vs key objectives and available budget accordingly.

3.5.2 Based on previous modelling, the estimated indication is a saving of £500,000 annually, from moving from the current weekly residual to a fortnightly residual collection service. There is an initial capital outlay estimated at £1.02 million for the purchase of residual waste bins to support the move to a fortnightly residual collection. There will also be distribution costs for the delivery of bins to consider in 2025/26, with an estimated cost of £175,000.

3.5.3 DEFRA funding of £1,665,840 has been allocated to the Council for the capital elements of the weekly food waste collection service i.e. procurement of internal/external food waste caddies (est. £590,000) and food waste vehicles (est. £1.08 million). The funding provided is therefore an accurate reflection of the anticipated costs.

3.5.4 The transitional and ongoing revenue/resource grants awarded by DEFRA for food waste have not yet been calculated by DEFRA, although it has been confirmed that funding will be provided to cover costs based on industry modelling similar to that used to calculate the capital cost allocation (see Appendix 1). As the Council's calculations for capital costs are considered accurate there is confidence that the revenue calculation will be reflective of the likely costs incurred. The ongoing revenue cost (staffing/fuel and on costs) is anticipated to be in the region of £800k-£1.25 million per annum. There will also be a future cost for distributing food waste caddies estimated at £125k, which is expected to be funded by the transitional revenue grant.

3.5.5 The administration and control of the subscriber element of the garden waste service provides a beneficial opportunity for the Council. This is currently provided by the incumbent contractor in the form of the 'green waste club' under the terms of the contract. The Council has the opportunity to take this service back in house at the end of the current contract period. The rationale for this is included at Appendix 2 of this report with a full project scope to be developed in the next twelve months. Controlling the subscriber element of the service would allow the Council to set fees and receive income for the service and provide direct customer service to subscribers. Any surplus would be reinvested back within Cleansing services.

3.5.6 Extended Producer Responsibility (EPR) is one of the key waste reforms of the Environment Act 2021 and will see the producers of packaging having to pay towards the costs of Local Authorities in dealing with this packaging. The mechanism for these payments is yet to be determined. Government consultation confirmed that *"Payments to local authorities for the cost of managing packaging waste generated by households (both packaging waste that is collected for recycling and packaging waste disposed of in residual waste) will be made under the packaging Extended Producer Responsibility scheme"*.

Collections from "Street Bins" i.e. litter bins are included within collection schemes (described as on-the-go packaging). However, any costs of litter collection are not included.

Contributions will be factored on authorities having an 'efficient and effective service' – i.e. those authorities that are seeking to maximise recycling of materials will likely receive a greater share of funding available.

3.5.7 A summary table of the financial considerations is provided in section 6 of this report.

### **3.6 Weekly food waste collections & fortnightly residual collections**

3.6.1 Over 42% by weight of the residual waste composition in Arun is food waste. This has been determined by previous waste composition analysis undertaken in advance of the Council's 1-2-3 food waste collections trial.

3.6.2 Weekly food waste combined with weekly residual waste collections are inefficient, uneconomic and unviable. The Local Government Association support this view. A weekly food waste/weekly residual waste is the most expensive collection option for the authority. Introducing a new weekly food waste collection service and retaining the same residual waste frequency and capacity, reduces the need for residents to make any use of a food waste collection service. It also removes the need to utilise the dry mixed recycling collection service.

3.6.3 If collected separately food waste can be processed via anaerobic digestion which is a much more efficient and environmentally friendly way of processing and provides higher value end products in the form of biogas and fertiliser. A reduction in food waste is generally seen in other authorities where food waste collections have been operating for a period of time, as residents change behaviours. Environmentally this is the best outcome. As the disposal authority, West Sussex County Council will be in a position to

accept and treat food waste via an approved reconfiguration to the current Mechanical & Biological Treatment (MBT) plant near Horsham.

3.6.4 The provision of a 240 litre residual bin for a fortnightly collection provides more than enough capacity for a fortnightly collection service and could allow the council to move to a 1-2-3 collection service in future as it provides sufficient capacity for a three weekly residual collection in almost all circumstances, as proven by the 1-2-3 trial. Recycling performance estimates for this option are 53%. With the likely introduction of soft plastics as a core recyclable material to be collected from 2027, this reduces the need for such residual capacity.

3.6.5 The alternative option of provision of 180 litre residual bin for a fortnightly collection would limit residual capacity and further drive the Council's recycling performance estimated 57% plus and encourages the right behaviours with residents to make best use of available recycling and weekly food waste collections. This will reduce future pressure to move to a 1-2-3 collections model, although a three weekly residual service could still work with a 180 litre bin.

3.6.6 Currently the Council does not provide residual waste bins. Sacks are left on the kerbside which does provide problems in respect of street cleansing due to the interference of seagulls/foxes. The provision of bins for residents is essential for moving to a fortnightly residual waste collection and will be a significantly positive step for residents.

3.6.7 In areas where it is physically not possible to have a wheeled bin for each resident, bespoke solutions to provide residual capacity and/or alternate frequency will be investigated and determined. Smaller bins such as 140 litre could also be provided on demand for properties that generate very little waste.

3.6.8 The Council previously operated a very successful 1-2-3 trial for 1,350 properties. Participation 85%+ and satisfaction 85% for food waste collections and 73% for three weekly residual collections was very high for the trial. This proves without doubt the majority of residents would make use of a weekly food waste collection and accept reduced frequency residual waste collections.

3.6.9 Currently residents receive 78 core collections per year (52 residual & 26 recycling). Under the proposals in this report residents will receive 104 collections per year (52 food waste, 26 residual & 26 recycling)

3.6.10 It is not intended that the Council will supply caddie liners to residents for food waste collections. The provision of caddie liners was withdrawn from the 1-2-3 trial and had no impact on participation/satisfaction.

## **4. CONSULTATION**

4.1 The Government has been consulting on waste reforms previously known as 'consistency in collections' and subsequently rebranded to 'simpler recycling' for the last 4 years. All sectors of the industry have been invited to submit representations on these proposals.



The West Sussex Waste Partnership which consists of West Sussex County Council and the collection authorities from across West Sussex have responded to each round of government consultation.

4.2 Consultation and resident engagement was undertaken as part of the Council's 1-2-3 collections trial. A summary is provided in the background papers '1-2-3 trial update' and in 3.6.8 above

4.3 Previous committee reports on the 1-2-3 trial and the CCSC have highlighted the key principles of waste reforms and service delivery options to members. Members of the Environment Committee were also invited to a tour and presentation on the waste arrangements in West Sussex and future strategy at the Ford Materials Recycling Facility in Sept 2023. An open briefing on waste reforms was held for members on the 5<sup>th</sup> March 2024.

4.4 Early market engagement. The Council sought the views of the main industry suppliers in respect of multiple aspects of the scope and direction of this contract procurement as outlined in 3.4.1 above.

## **5. OPTIONS / ALTERNATIVES CONSIDERED**

1. Retention of a weekly residual service/service from sacks – not considered a viable option because of the requirement to introduce separate weekly food waste collections as outlined in 3.6.2. of the report.
2. Three weekly residual service – This a not a frequency currently supported by government under 'Simpler recycling' reforms. Without the inclusion of Absorbent Hygiene Products Collection (AHP) collection, see below in 3, a three weekly collection could be a significant challenge for families. Whilst this would drive recycling rates to the highest level, it is operationally more challenging and would be very resource intensive from a planning and project perspective rolled out for all 76,000 properties. Based on previous cost analysis a three weekly residual service does not offer a significant financial saving compared to two weekly residual collections, estimated £100,000. The provision of a 180 litre residual bin as opposed to a 240 litre residual bin would further drive recycling performance therefore reducing the need to move to a three weekly residual service, although this would remain an option in future.
3. The inclusion of an Absorbent Hygiene Products Collection as a potential bolt on service as per the 1-2-3 trial. This would incur significant additional costs estimated between £500-750k and there is no current funding incentive or necessity with a fortnightly residual collection to provide this.
4. 140 litre residual bin as standard with fortnightly residual collection. Is considered a small capacity and would not allow the potential move to a three weekly service in future.

## 6. COMMENTS BY THE GROUP HEAD OF FINANCE/SECTION 151 OFFICER

6.1 The service recommendations in this report seek to minimise the future budgetary risk associated with the procurement and delivery of the CCSC. The costs are summarised in the table below.

Item/service	Cost/saving	Funded
<b>Capital</b>		
Food waste caddies internal & external purchase	£590k purchase cost	DEFRA capital funding allocation – received
Food waste caddie delivery costs	£125k cost (one off cost)	DEFRA Transitional funding
Food waste vehicles	£1.08 million cost	DEFRA capital funding allocation - received
Residual bins purchase	£1.02 million cost	ADC capital budget. Any borrowing costs offset by annual contract saving
Residual bin delivery costs	£175k cost (one off cost)	ADC capital budget, offset by annual contract saving
<b>Revenue</b>		
Food waste collections	Est. £800k-£1.25 million per annum cost	DEFRA revenue funding allocation
Move to fortnightly residual collection	Est. £500k saving per annum	N/A
Other Core contract services	Est. £7-7.5 million per annum cost	Existing allocated contract revenue budget. In part also subsidised by future Extended Producer Responsibility payments Garden waste subscription service to part offset ongoing revenue cost

6.2 It is difficult at this stage to quantify, but it is expected that the Council will be in a financially advantageous position once the contract has been re-let. It is estimated that the move to fortnightly collections could generate an annual saving of £500,000 although some of this may be needed to fund residual bin delivery costs and the borrowing costs associated with the purchase of new bins. An additional income stream is also expected once the Extended Producer Responsibility scheme is introduced next year but no indication has yet been given as to how much this might be.

6.3 DEFRA have already provided this Council with a grant of £1,665,840, which will fund a majority of the contract's capital expenditure requirement. They have also indicated that further grant payments will be forthcoming to fund other transitional and revenue running costs associated with Food Waste collections. If the level of funding is lower than anticipated a further report will be brought to Members outlining options to fund any shortfall.

## **7. RISK ASSESSMENT CONSIDERATIONS**

There are many procurement and contract mobilisation based risks which will be fully assessed as part of procurement process. One of the most significant risks concerns the lead in times for the procurement of vehicles/receptacles for food waste collections. The Council has sought to maximise the mobilisation period (12 months) for this contract within its procurement timeline to allow for this. However, there remains a risk due to national demand/supply chain capacity associated with 1<sup>st</sup> April 2026 requirement for all authorities to introduce food waste collections. It is therefore imperative that Members take a decision on the future configuration of services now, in order to reduce risks as far as reasonably practicable associated with cost, procurement delivery and purchasing.

Business continuity and contingency plans will be reviewed and considered as part of the tender process, evaluation and mobilisation. The worst-case scenario is that the roll out of food waste collections may be delayed at the start of the new contract depending on the capacity of national supply chains for vehicles and waste receptacles. Members will be updated as required.

Whilst it is not known what the implications from Government may be for not rolling out weekly food waste collections from March 1<sup>st</sup> 2026, it is considered likely that leeway will be provided if evidenced plans are in place to make this transition at the earliest opportunity available. It would be a significant risk for Members not to endorse a weekly food waste collection/reduced frequency residual collection from the start of the new contract. This risk would extend to reputation, performance, statutory compliance and the procurement/contractual/financial risk of then introducing a forced change to services part way through a contract.

## **8. COMMENTS OF THE GROUP HEAD OF LAW AND GOVERNANCE & MONITORING OFFICER**

8.1 Legal Support is to be provided by the Council's external solicitors given the size of the project and the specialist legal support required.

8.2 The Council's Contract Standing Orders state that where the value of a contract is to be above the UK Threshold, as this contract is, the following apply:

- Where not already in existence Committee approval of the budget to be obtained prior to the commencement of any procurement process and at the same time Committee approval to award the contract if bids/returns come within budget.
- Procurement to be consulted prior to the commencement of any procurement activity

to determine the method of procurement, advise on tender documentation, agree the procurement timetable and the most suitable criteria for evaluation and award of contract.

- Legal Services to be consulted prior to the commencement of any procurement activity in relation to contractual terms.
- Procurement Pro-forma to be completed by officer and signed off by the Council's Procurement Officer [Hampshire CC] agreeing approach and methodology to be used.
- Procurement Pro-forma to be retained on contract file.
- No Committee decision is required at the pre-award stage unless the proposed contract's value is in excess of the approved budget.

All of these requirements are in hand, either internally under delegated authority to the Group Head of Environment and Climate Change or through authorities requested through the recommendations within this report.

## **9. HUMAN RESOURCES IMPACT**

Transfer of Undertakings Employment Protection rights (TUPE) implications considered as part of the procurement process and contractual terms and conditions. As services are contracted out, TUPE would be applicable between the incumbent contractor and any new contractor. This also potentially applies to any services transferred between the contractor and the Council. The HR implications of the delivery of subscriber services will be fully considered as part of the project management for this project.

## **10. HEALTH & SAFETY IMPACT**

Health & Safety management for services delivered under the contract subject to a robust pass/fail assessment at tender evaluation stage.

## **11. PROPERTY & ESTATES IMPACT**

The lease of the Council's depot at Harwood Road. The Group Head of Technical Services has delegated authority to issue a lease at appropriate market rent to run concurrently with the contract and any extension periods.

## **12. EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE**

An EIA is provided in Appendix 3.

Social value of the procurement/contract will be assessed at tender evaluation stage

### **13. CLIMATE CHANGE & ENVIRONMENTAL IMPACT**

These are key considerations in the award and future delivery of the CCSC. Scope 3 emissions (supply chain) make up 91% of the Council's indirect CO2 emissions. Within this Biffa is the largest single emitter

It is therefore important to minimise as far as reasonably practicable the environmental impact of the procurement and delivery of the CCSC. Bidders are in a strong position to outline innovation in respect of tackling climate change through delivery of this contract.

In order to achieve this, advice has been sought from the Council's Climate Change and Sustainability Manager concerning the procurement and evaluation of bids and initiatives and impacts relating to sustainability and Co2 emissions. They will also be directly involved in the assessment of the bidders environmental proposals and initiatives.

### **14. CRIME AND DISORDER REDUCTION IMPACT**

N/A

### **15. HUMAN RIGHTS IMPACT**

N/A

### **16. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS**

Contractual clauses/compliance with relevant FOI & DP legislation and requirement reviewed and advised on by legal representatives. Transfer of customer data from incumbent supplier associated with ADC delivery of garden waste subscriber service.

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#### **CONTACT OFFICER:**

Name: Oliver Handson

Job Title: Environmental Services & Strategy Manager

Contact Number: 01903 737955

#### **BACKGROUND DOCUMENTS:**

1. [Report to Environment Committee 'Combined Cleansing Services Contract' 19<sup>th</sup> May 2022](#)
2. [Report to Cabinet 'Food waste & AHP collection services trial' 16<sup>th</sup> November 2020](#)
3. [Report to Environment Committee '1-2-3 food waste trial update' 20<sup>th</sup> January 2022](#)
4. [Link to government simpler recycling Government response - GOV.UK \(www.gov.uk\)](#)

## **Appendices**

1. *DEFRA funding letter for the introduction of food waste collections*
2. *Garden Waste Subscriber Service rationale*
3. *Equalities Impact Assessment*



Department  
for Environment  
Food & Rural Affairs

**Emma Bourne**  
Director, Resource and Waste  
**Department for Environment,  
Food and Rural Affairs**

2 Marsham Street,  
London, SW1P 4DF

9 January 2024

Dear Chief Executive,

### **Weekly food waste collections – indicative capital transitional costs for the introduction of weekly food waste collections**

Thank you for your continued engagement with our Collection and Packaging Reforms, including Simpler Recycling. Through Simpler Recycling, we will ensure that people across England are able to recycle the same materials, putting an end to confusion over what can and cannot be recycled in different parts of country; and introduce weekly collections of food waste.

I am writing to provide further detail on the indicative transitional capital funding to fund waste collection authorities (WCAs) for the delivery of weekly food waste collections (subject to Ministerial approval). This will come into effect for households from 1 April 2026, as required under s45A of the Environmental Protection Act 1990 (introduced by the [Environment Act 2021 \(legislation.gov.uk\)](#)). Further details can be found in the [Simpler Recycling Government response](#). Details of the funding are provided in Annex A. If you are due to receive a bespoke transitional arrangement (delayed food waste implementation date) then you will not receive the funding listed until an appropriate point before your bespoke transitional arrangement is due to end. This is to ensure that there is no funding in advance of need.

Please respond to [recycling@defra.gov.uk](mailto:recycling@defra.gov.uk) by 19 January 2024, confirming the bank account (account name, sort code, account number) on header paper, signed by a senior responsible officer or authorised finance officer, to which grant payments should be made. It will not be possible for us to provide capital payments until this has been provided.

This capital funding is intended for the purchase of food bins (this includes internal kitchen caddies, external kerbside caddies and communal bins) and food waste collection vehicles. This funding will be provided through Section 31 grants. Letters will be sent to local authorities this financial year on a non-ring-fenced basis.

The funding has been calculated in collaboration with the Waste Resources Action Programme (WRAP). It has been modelled using a bottom-up modelling approach that has involved creating modules for common service areas, typically operated within each council area. The key modules are kerbside, flatted/communal and remote rural properties. The modules each contain standard groupings to account for contextual and service variation within each council area to reflect the different cost profiles for each housing stock type. The cost values are scaled by the numbers of properties reported in each council area to provide a unique cost allocation for each council. The model accounts for a number of variables including rurality, levels of deprivation, number of kerbside and flatted properties, configuration of flatted properties, food waste yields, vehicle and container unit costs, and average collection round sizes.

To ensure the model is as robust as possible, the assumptions and outputs have been tested with colleagues in the Department for Levelling Up, Housing and Communities, local authority associations and some local authorities before sharing this information with you.

To set this in context, I would like to set out when you should expect all sources of funding in relation to Simpler Recycling. It is our intention that:

- Capital transitional costs, as above, will be funded in the 2023/24 financial year. This funding will be provided to waste collection authorities that need to implement or extend a weekly food waste collection service, either partially or fully.
- Resource transitional funding will be provided from the 2024/25 financial year. This money will be provided to waste collection authorities that either need to implement a weekly food waste collection service partially or fully.



- Ongoing resource/revenue costs will be provided from 1 April 2026 and will be provided to all waste collection authorities, including those that have already fully implemented a food waste collection service.
- We are currently calculating transitional and ongoing resource costs and will be writing to you on these in due course.

If you have any questions regarding this letter, please do not hesitate to contact [recycling@defra.gov.uk](mailto:recycling@defra.gov.uk).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'E Bourne', with a horizontal line underneath.

**Emma Bourne**

**Director, Resources and Waste**

## Annex A: funding allocations

LA	Kitchen caddies (plus spares)	Kerbside caddies (plus spares)	Communal wheeled bins (plus spares)	Vehicles (Plus spares)	Total funding
Adur District Council	£60,900	£140,070	£0	£306,900	£507,870
Amber Valley Borough Council	£115,899	£257,101	£11,466	£818,400	£1,202,866
Arun District Council	£163,800	£376,740	£0	£1,125,300	£1,665,840
Ashfield District Council	£116,372	£267,654	£0	£511,500	£895,526
Ashford Borough Council	£10,500	£24,150	£0	£102,300	£136,950
Barking and Dagenham London Borough	£166,186	£227,995	£186,802	£716,100	£1,297,083
Barnet London Borough	£330,922	£380,411	£461,109	£1,534,500	£2,706,942
Barnsley Metropolitan Borough Council	£239,400	£550,620	£0	£1,023,000	£1,813,020
Basildon District Council	£0	£0	£0	£102,300	£102,300
Basingstoke and Deane Borough Council	£168,113	£337,066	£60,068	£818,400	£1,383,648
Bassetlaw District Council	£112,100	£254,705	£3,785	£716,100	£1,086,690
Bath and North East Somerset Council	£210	£483	£0	£0	£693
Bedford UA	£163,065	£337,332	£45,683	£1,023,000	£1,569,080
Bexley London Borough	£36,435	£0	£101,498	£102,300	£240,233
Birmingham City Council	£955,500	£1,762,950	£526,500	£3,580,500	£6,825,450
Blaby District Council	£92,646	£211,544	£1,866	£613,800	£919,856
Blackburn with Darwen Borough Council	£132,930	£293,181	£15,210	£716,100	£1,157,421
Blackpool Borough Council	£148,029	£280,285	£72,891	£613,800	£1,115,005

Bolsover District Council	£0	£180,154	£0	£511,500	£691,654
Bolton Metropolitan Borough Council	£3,677	£383,946	£10,243	£818,400	£1,216,267
Boston Borough Council	£65,785	£151,039	£322	£511,500	£728,645
Bournemouth, Christchurch and Poole Council	£147,956	£98,455	£292,915	£613,800	£1,153,126
Bracknell Forest Borough Council	£20,425	£0	£56,897	£102,300	£179,622
Braintree District Council	£32,531	£38,384	£44,132	£204,600	£319,648
Breckland District Council	£128,751	£296,127	£0	£716,100	£1,140,978
Brent London Borough	£26,082	£0	£72,657	£102,300	£201,039
Brentwood Borough Council	£8,610	£19,803	£0	£102,300	£130,713
Brighton and Hove Council	£294,000	£480,102	£237,510	£1,432,200	£2,443,812
Bristol Council	£0	£0	£0	£0	£0
Broadland District Council	£0	£0	£0	£0	£0
Bromley London Borough	£13,742	£0	£38,282	£0	£52,025
Bromsgrove District Council	£87,488	£201,223	£0	£613,800	£902,511
Broxbourne Borough Council	£14,282	£0	£39,786	£0	£54,068
Broxtowe Borough Council	£105,355	£242,316	£0	£716,100	£1,063,771
Buckinghamshire Council	£60,108	£77,005	£74,178	£409,200	£620,491
Burnley Borough Council	£91,193	£209,743	£0	£409,200	£710,135
Bury Metropolitan Borough Council	£0	£395,336	£14,625	£1,329,900	£1,739,861
Calderdale Metropolitan Borough Council	£12,600	£0	£35,100	£102,300	£150,000
Cambridge City Council	£13,257	£567,965	£0	£1,943,700	£2,524,922

Camden London Borough	£52,225	£0	£145,484	£409,200	£606,909
Cannock Chase District Council	£93,771	£212,520	£3,820	£716,100	£1,026,211
Canterbury City Council	£0	£0	£0	£0	£0
Castle Point Borough Council	£0	£0	£0	£0	£0
Central Bedfordshire UA	£39,900	£17,026	£90,529	£306,900	£454,355
Charnwood Borough Council	£164,010	£377,223	£0	£818,400	£1,359,633
Chelmsford Borough Council	£21,210	£48,783	£0	£102,300	£172,293
Cheltenham Borough Council	£0	£0	£0	£0	£0
Cherwell District Council	£4,200	£0	£11,700	£102,300	£118,200
Cheshire East UA	£29,547	£840,758	£0	£1,841,400	£2,711,705
Cheshire West and Chester UA	£25,200	£0	£70,200	£102,300	£197,700
Chesterfield Borough Council	£10,672	£216,896	£25,933	£511,500	£765,001
Chichester District Council	£124,998	£229,995	£69,644	£818,400	£1,243,037
Chorley Borough Council	£110,126	£248,750	£5,499	£818,400	£1,182,775
City of Bradford Metropolitan District Council	£489,300	£1,125,390	£0	£2,046,000	£3,660,690
City of London	£12,621	£0	£35,159	£0	£47,780
Colchester Borough Council	£24,786	£0	£69,048	£102,300	£196,134
Cornwall County UA	£586,784	£1,349,603	£0	£3,580,500	£5,516,888
Cotswold District Council	£0	£0	£0	£0	£0
Coventry City Council	£47,290	£627,972	£68,942	£1,125,300	£1,869,505
Crawley Borough Council	£98,748	£174,851	£63,309	£511,500	£848,408
Croydon London Borough	£12,111	£0	£33,737	£0	£45,848

Cumberland UA	£279,670	£596,495	£56,616	£1,636,800	£2,569,581
Dacorum Borough Council	£0	£0	£0	£0	£0
Darlington Borough Council	£109,931	£245,234	£9,214	£818,400	£1,182,778
Dartford Borough Council	£102,837	£190,640	£55,575	£511,500	£860,552
Derby City Council	£96,398	£460,400	£96,285	£1,023,000	£1,676,084
Derbyshire Dales District Council	£0	£0	£0	£0	£0
Doncaster Metropolitan Borough Council	£303,072	£640,743	£68,217	£1,227,600	£2,239,632
Dorset Council	£0	£0	£0	£0	£0
Dover District Council	£5,292	£0	£14,742	£0	£20,034
Dudley Metropolitan Borough Council	£341,055	£692,091	£111,834	£1,534,500	£2,679,480
Durham County UA	£529,410	£1,203,153	£17,550	£2,966,700	£4,716,813
Ealing London Borough	£53,309	£0	£148,502	£204,600	£406,411
East Cambridgeshire District Council	£84,926	£195,330	£0	£613,800	£894,056
East Devon District Council	£0	£0	£0	£0	£0
East Hampshire District Council	£122,942	£282,768	£0	£920,700	£1,326,410
East Hertfordshire District Council	£140,515	£254,237	£83,509	£1,023,000	£1,501,261
East Lindsey District Council	£157,500	£362,250	£0	£920,700	£1,440,450
East Riding of Yorkshire Council	£14,872	£771,003	£11,700	£2,148,300	£2,945,875
East Staffordshire Borough Council	£111,888	£241,882	£18,726	£613,800	£986,295
East Suffolk District Council	£252,504	£580,759	£0	£1,534,500	£2,367,763
Eastbourne Borough Council	£104,843	£241,138	£0	£511,500	£857,480
Eastleigh Borough Council	£6,388	£0	£17,796	£0	£24,184
Elmbridge Borough Council	£5,529	£0	£15,403	£0	£20,932

Enfield London Borough	£111,300	£62,790	£234,000	£511,500	£919,590
Epping Forest Borough Council	£0	£0	£0	£0	£0
Epsom and Ewell Borough Council	£1,586	£0	£4,417	£102,300	£108,302
Erewash Borough Council	£111,682	£256,869	£0	£716,100	£1,084,651
Exeter City Council	£101,770	£187,684	£56,183	£511,500	£857,138
Fareham Borough Council	£106,065	£218,335	£31,023	£613,800	£969,223
Fenland District Council	£95,550	£219,765	£0	£511,500	£826,815
Folkestone and Hythe District Council	£1,239	£0	£3,451	£0	£4,690
Forest of Dean District Council	£0	£0	£0	£0	£0
Fylde Borough Council	£85,231	£186,607	£11,413	£511,500	£794,751
Gateshead Metropolitan Borough Council	£198,156	£399,195	£68,509	£818,400	£1,484,260
Gedling Borough Council	£109,158	£251,063	£0	£613,800	£974,021
Gloucester City Council	£9,633	£1,096	£25,506	£102,300	£138,535
Gosport Borough Council	£79,044	£181,801	£0	£409,200	£670,045
Gravesham Borough Council	£8,520	£971	£22,558	£102,300	£134,348
Great Yarmouth Borough Council	£100,338	£196,967	£40,950	£511,500	£849,755
Greenwich London Borough	£52,139	£0	£145,244	£204,600	£401,983
Guildford Borough Council	£3,452	£0	£9,617	£0	£13,070
Hackney London Borough	£24,375	£0	£67,901	£102,300	£194,576
Halton Borough Council	£122,661	£279,614	£3,036	£613,800	£1,019,111
Hammersmith and Fulham London Borough	£180,556	£297,064	£143,179	£818,400	£1,439,199

Harborough District Council	£87,297	£200,783	£0	£613,800	£901,880
Haringey London Borough	£12,600	£0	£35,100	£0	£47,700
Harlow District Council	£20,194	£0	£56,254	£0	£76,447
Harrogate Borough Council	£159,600	£352,590	£17,550	£1,227,600	£1,757,340
Harrow London Borough	£0	£0	£0	£0	£0
Hart District Council	£89,011	£179,420	£30,648	£511,500	£810,579
Hartlepool Borough Council	£88,830	£194,649	£11,700	£511,500	£806,679
Hastings Borough Council	£92,545	£192,775	£24,318	£511,500	£821,138
Havant Borough Council	£110,313	£253,720	£0	£511,500	£875,533
Havering London Borough	£227,243	£431,831	£110,009	£1,125,300	£1,894,383
Herefordshire Council	£186,276	£405,609	£27,647	£1,227,600	£1,847,132
Hertsmere Borough Council	£15,958	£192,693	£44,454	£511,500	£764,605
High Peak Borough Council	£0	£200,638	£4,095	£716,100	£920,833
Hillingdon London Borough	£52,206	£0	£145,431	£409,200	£606,837
Hinckley and Bosworth Borough Council	£107,587	£247,451	£0	£716,100	£1,071,138
Horsham District Council	£137,750	£275,638	£49,883	£1,023,000	£1,486,271
Hounslow London Borough	£33,833	£0	£94,249	£102,300	£230,382
Hull City Council	£25,040	£485,019	£64,163	£920,700	£1,494,922
Huntingdonshire District Council	£171,908	£359,536	£43,425	£1,227,600	£1,802,468
Hyndburn Borough Council	£77,700	£178,710	£0	£409,200	£665,610
Ipswich Borough Council	£129,465	£248,774	£59,342	£511,500	£949,081
Isle of Wight Council	£0	£0	£0	£0	£0
Isles of Scilly Council	£0	£0	£0	£0	£0

Islington London Borough	£130,200	£0	£362,700	£613,800	£1,106,700
Kensington and Chelsea Royal Borough	£186,369	£296,272	£160,331	£920,700	£1,563,672
Kings Lynn and West Norfolk Borough Council	£294	£0	£819	£0	£1,113
Kingston upon Thames Royal Borough	£15,007	£0	£41,804	£102,300	£159,111
Kirklees Council	£396,480	£911,904	£0	£1,636,800	£2,945,184
Knowsley Metropolitan Borough Council	£147,842	£332,005	£9,729	£716,100	£1,205,675
Lambeth London Borough	£115,500	£0	£321,750	£716,100	£1,153,350
Lancaster City Council	£132,909	£301,972	£4,505	£1,023,000	£1,462,385
Leeds City Council Metropolitan Borough Council	£750,095	£1,226,115	£604,504	£4,296,600	£6,877,314
Leicester City Council	£296,898	£523,359	£193,190	£1,227,600	£2,241,048
Lewes District Council	£0	£0	£0	£0	£0
Lewisham London Borough	£130,200	£0	£362,700	£511,500	£1,004,400
Lichfield District Council	£94,496	£210,680	£8,067	£818,400	£1,131,643
Lincoln City Council	£94,962	£196,938	£26,009	£511,500	£829,410
Liverpool City Council	£451,370	£835,590	£245,337	£1,841,400	£3,373,697
London Borough of Richmond upon Thames	£37,615	£14,065	£87,750	£409,200	£548,630
Luton Borough Council	£175,684	£321,963	£99,450	£818,400	£1,415,497
Maidstone Borough Council	£0	£0	£0	£0	£0
Maldon District Council	£2,667	£0	£7,430	£0	£10,097
Malvern Hills District Council	£78,691	£173,281	£9,337	£716,100	£977,409
Manchester City Council	£102,306	£833,576	£284,994	£1,841,400	£3,062,276
Mansfield District Council	£102,896	£236,660	£0	£511,500	£851,056



Medway Borough Council	£53,567	£32,617	£109,717	£306,900	£502,801
Melton Borough Council	£46,830	£107,023	£831	£409,200	£563,884
Merton London Borough	£29,400	£3,260	£77,951	£204,600	£315,212
Mid Devon District Council	£0	£0	£0	£0	£0
Mid Suffolk District Council	£104,393	£232,830	£8,810	£716,100	£1,062,133
Mid Sussex District Council	£136,145	£264,887	£58,436	£613,800	£1,073,268
Middlesbrough Borough	£127,071	£292,263	£0	£511,500	£930,834
Milton Keynes Council	£14,234	£0	£39,651	£102,300	£156,185
Mole Valley District Council	£3,427	£0	£9,547	£0	£12,974
New Forest District Council	£173,586	£399,248	£0	£1,227,600	£1,800,434
Newark and Sherwood District Council	£111,993	£257,584	£0	£613,800	£983,377
Newcastle City Council	£289,380	£521,287	£174,757	£1,227,600	£2,213,024
Newcastle-under-Lyme Borough Council	£4,305	£9,902	£0	£0	£14,207
Newham London Borough	£267,943	£340,607	£333,877	£1,125,300	£2,067,727
North Devon District Council	£0	£0	£0	£0	£0
North East Derbyshire District Council	£2,226	£228,266	£0	£613,800	£844,292
North East Lincolnshire Council	£150,738	£327,165	£23,657	£716,100	£1,217,660
North Hertfordshire District Council	£0	£0	£0	£0	£0
North Kesteven District Council	£97,793	£224,923	£0	£613,800	£936,516
North Lincolnshire Council	£158,987	£357,381	£10,039	£1,023,000	£1,549,407
North Norfolk District Council	£115,584	£265,843	£0	£716,100	£1,097,527

North Northamptonshire	£228,768	£518,921	£8,775	£1,739,100	£2,495,563
North Somerset Council	£14,213	£0	£39,593	£0	£53,806
North Tyneside Metropolitan Borough Council	£212,810	£388,612	£122,148	£920,700	£1,644,270
North Warwickshire Borough Council	£525	£136,182	£0	£409,200	£545,907
North West Leicestershire District Council	£104,838	£241,128	£0	£716,100	£1,062,066
North Yorkshire Council	£462,512	£1,050,235	£16,403	£3,273,600	£4,802,751
Northumberland County UA	£304,920	£701,297	£23	£1,943,700	£2,949,940
Norwich City Council	£0	£0	£0	£0	£0
Nottingham City Council	£275,100	£632,730	£0	£1,023,000	£1,930,830
Nuneaton and Bedworth Borough Council	£90,594	£246,678	£29,648	£613,800	£980,720
Oadby and Wigston Borough Council	£47,859	£110,076	£0	£306,900	£464,835
Oldham Metropolitan Borough Council	£15,330	£0	£42,705	£102,300	£160,335
Oxford City Council	£0	£0	£0	£0	£0
Pendle Borough Council	£85,302	£194,393	£2,182	£511,500	£793,377
Peterborough City Council	£0	£0	£0	£0	£0
Plymouth City Council	£243,062	£491,955	£81,257	£1,125,300	£1,941,574
Portsmouth City Council	£0	£0	£0	£0	£0
Preston City Council	£136,836	£314,723	£0	£613,800	£1,065,359
Reading Borough Council	£6,949	£15,982	£0	£102,300	£125,231
Redbridge London Borough	£227,949	£417,645	£129,156	£1,023,000	£1,797,750
Redcar and Cleveland Borough Council	£129,253	£297,282	£0	£613,800	£1,040,335

Redditch Borough Council	£76,963	£172,185	£5,850	£511,500	£766,498
Reigate and Banstead Borough Council	£26,292	£0	£73,242	£102,300	£201,834
Ribble Valley Borough Council	£54,346	£124,996	£0	£409,200	£588,541
Rochdale Metropolitan Borough Council	£8,402	£14,538	£8,781	£409,200	£440,921
Rochford District Council	£179	£0	£497	£102,300	£102,976
Rosendale Borough Council	£68,872	£158,405	£0	£511,500	£738,776
Rother District Council	£97,186	£199,257	£29,396	£716,100	£1,041,939
Rotherham Metropolitan Borough Council	£252,292	£580,271	£0	£1,023,000	£1,855,563
Rugby Borough Council	£14,666	£236,955	£0	£716,100	£967,721
Runnymede Borough Council	£19,692	£5,975	£47,619	£102,300	£175,585
Rushcliffe Borough Council	£102,144	£228,097	£8,278	£818,400	£1,156,919
Rushmoor Borough Council	£0	£0	£0	£0	£0
Rutland County Council	£37,605	£85,525	£1,170	£409,200	£533,500
Salford Metropolitan District Council	£0	£0	£0	£0	£0
Sandwell Metropolitan Borough Council	£34,780	£0	£96,888	£204,600	£336,268
Sefton	£270,711	£567,061	£67,310	£1,739,100	£2,644,182
Sevenoaks District Council	£109,941	£252,865	£0	£818,400	£1,181,206
Sheffield City Council	£535,334	£952,519	£337,615	£2,250,600	£4,076,069
Shropshire County UA	£124,969	£722,423	£0	£1,943,700	£2,791,092
Slough Borough Council	£111,300	£159,390	£117,000	£1,788,600	£2,176,290
Solihull Metropolitan Borough Council	£197,400	£388,965	£78,794	£1,023,000	£1,688,158
Somerset County Council	£29,530	£12,944	£66,585	£278,300	£387,359

South Derbyshire District Council	£0	£198,030	£0	£613,800	£811,830
South Gloucestershire Council	£20,979	£48,252	£0	£102,300	£171,531
South Hams District Council	£49,783	£114,500	£0	£306,900	£471,183
South Holland District Council	£89,513	£205,879	£0	£511,500	£806,891
South Kesteven District Council	£136,500	£313,950	£0	£920,700	£1,371,150
South Norfolk Council	£134,190	£307,507	£1,369	£920,700	£1,363,766
South Oxfordshire District Council	£0	£0	£0	£0	£0
South Ribble Borough Council	£106,008	£243,818	£0	£511,500	£861,326
South Staffordshire District Council	£103,950	£226,087	£15,742	£920,700	£1,266,480
South Tyneside Metropolitan Borough Council	£151,271	£344,543	£4,095	£716,100	£1,216,010
Southampton City Council	£249,077	£394,553	£215,982	£1,023,000	£1,882,612
Southend on Sea City Council	£29,952	£0	£83,439	£732,600	£845,991
Southwark London Borough	£159,180	£13,360	£427,249	£716,100	£1,315,889
Spelthorne Borough Council	£23,100	£9,660	£52,650	£204,600	£290,010
St Albans District Council	£4,838	£0	£13,478	£0	£18,317
St Helens Metropolitan Borough Council	£0	£0	£0	£0	£0
Stafford Borough Council	£130,137	£273,875	£30,812	£1,023,000	£1,457,824
Staffordshire Moorlands District Council	£1,680	£209,332	£5,850	£716,100	£932,962
Stevenage Borough Council	£0	£182,477	£0	£409,200	£591,677
Stockport Metropolitan Borough Council	£57,448	£75,580	£68,492	£306,900	£508,419

Stockton-on-Tees Borough Council	£186,270	£428,421	£0	£818,400	£1,433,091
Stoke-on-Trent City Council	£55,432	£432,362	£154,417	£1,023,000	£1,665,210
Stratford-on-Avon District Council	£0	£0	£0	£0	£0
Stroud District Council	£0	£0	£0	£0	£0
Sunderland City Council	£270,900	£602,900	£24,430	£1,125,300	£2,023,530
Surrey Heath Borough Council	£3,297	£7,583	£0	£0	£10,880
Sutton London Borough	£37,130	£0	£103,434	£204,600	£345,164
Swale Borough Council	£7,035	£16,181	£0	£0	£23,216
Swindon Borough Council	£186,900	£369,495	£73,125	£1,125,300	£1,754,820
Tameside Metropolitan Borough Council	£1,890	£3,864	£585	£204,600	£210,939
Tamworth Borough Council	£67,973	£149,773	£7,950	£409,200	£634,896
Tandridge District Council	£336	£0	£936	£0	£1,272
Teignbridge District Council	£0	£0	£0	£0	£0
Telford and Wrekin Council	£0	£0	£0	£0	£0
Tendring District Council	£22,050	£50,715	£0	£204,600	£277,365
Test Valley Borough Council	£122,283	£250,798	£36,884	£920,700	£1,330,665
Tewkesbury Borough Council	£0	£0	£0	£0	£0
Thanet District Council	£10,500	£0	£29,250	£102,300	£142,050
Three Rivers District Council	£11,907	£27,386	£0	£0	£39,293
Thurrock Council	£38,063	£0	£106,031	£204,600	£348,694
Tonbridge and Malling Borough Council	£0	£0	£0	£0	£0
Torbay Borough Council	£12,233	£0	£34,076	£102,300	£148,609

Torrige District Council	£0	£0	£0	£0	£0
Tower Hamlets London Borough	£217,581	£14,490	£588,569	£920,700	£1,741,340
Trafford Metropolitan Borough Council	£38,094	£9,612	£94,478	£306,900	£449,083
Tunbridge Wells Borough Council	£12,621	£29,028	£0	£102,300	£143,949
Uttlesford District Council	£0	£0	£0	£0	£0
Vale of White Horse	£0	£0	£0	£0	£0
Wakefield Metropolitan District Council	£337,058	£768,385	£8,295	£1,534,500	£2,648,239
Walsall Metropolitan Borough Council	£245,721	£513,593	£62,455	£1,023,000	£1,844,769
Waltham Forest London Borough	£65,121	£352,010	£141,161	£920,700	£1,478,992
Wandsworth London Borough	£311,037	£417,355	£360,968	£1,329,900	£2,419,261
Warrington Borough Council	£192,717	£443,249	£0	£1,227,600	£1,863,566
Warwick District Council	£29,278	£22,493	£54,317	£102,300	£208,389
Watford Borough Council	£19,513	£0	£54,358	£102,300	£176,171
Waverley Borough Council	£0	£0	£0	£0	£0
Wealden District Council	£153,680	£327,894	£30,970	£1,125,300	£1,637,844
Welwyn Hatfield District Council	£48,720	£195,881	£36,533	£511,500	£792,634
West Berkshire District Council	£0	£0	£0	£0	£0
West Devon Borough Council	£0	£0	£0	£0	£0
West Lancashire Borough Council	£108,150	£248,745	£0	£716,100	£1,072,995
West Lindsey District Council	£92,127	£197,402	£17,550	£716,100	£1,023,179

West Northamptonshire	£34,335	£2,174	£93,015	£204,600	£334,124
West Oxfordshire District Council	£846	£0	£2,358	£0	£3,204
West Suffolk District Council	£172,786	£386,878	£12,753	£1,125,300	£1,697,717
Westminster City Council	£187,740	£144,900	£347,490	£818,400	£1,498,530
Westmoreland and Furness UA	£236,093	£543,013	£0	£1,432,200	£2,211,305
Wigan Metropolitan Borough Council	£14,440	£585,753	£46,800	£1,432,200	£2,079,193
Wiltshire County UA	£485,745	£1,063,349	£65,239	£3,375,900	£4,990,233
Winchester City Council	£136,641	£264,935	£59,758	£920,700	£1,382,034
Windsor and Maidenhead Royal Borough Council	£0	£0	£0	£0	£0
Wirral Metropolitan Borough Council	£314,727	£684,865	£47,245	£1,329,900	£2,376,737
Woking Borough Council	£0	£0	£0	£0	£0
Wokingham District Council	£0	£0	£0	£0	£0
Wolverhampton Metropolitan Borough Council	£235,200	£511,980	£35,100	£1,023,000	£1,805,280
Worcester City Council	£96,655	£222,306	£0	£409,200	£728,160
Worthing Borough Council	£110,397	£253,913	£0	£511,500	£875,810
Wychavon District Council	£126,689	£291,384	£0	£818,400	£1,236,473
Wyre Borough Council	£113,791	£259,323	£2,902	£920,700	£1,296,715
Wyre Forest	£97,033	£216,287	£8,342	£716,100	£1,037,762
York City Council	£192,822	£398,089	£54,990	£1,023,000	£1,668,901

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Arun District Council

**Project Documentation**

**Outline rationale for  
internalisation of garden waste subscriber service**

<b>Date:</b>	9/1/24
<b>Author:</b>	O.Handson/Penhaligon Consulting
<b>Document Name:</b>	Internalisation of Garden Waste Subscriber Administration Service

## Approvals

This document requires the following approvals:

Name
Philippa Dart – Director of Environment & Communities & Interim joint CEO
Joe Russell-Wells – Group Head Environment & Climate Change
Tony Baden – Group Head of Finance

## Distribution

A final copy of this document will be distributed to:

Name
Those named in approvals above plus the Environment Committee as part of report 19.03.24

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## **1.0 Purpose of Document**

The purpose of this document is to outline the anticipated benefits to be gained from the Council delivering the administration of subscriber services for garden waste collections.

This is an “outline” document and the detail will be confirmed as part of the project delivery phase of the project.

The purpose of this document is to identify the potential benefit to the authority of taking the direct control of these services ‘in house’ and the next steps in the process.

## **2.0 Reasons & Changes**

The service known currently as ‘the green waste club’ was set up and managed by the incumbent contractor on behalf of the Council since the beginning of the original combined cleansing services contract in 2003.

The contractor bore the financial risk of the initial set up, establishment and growth of the service. The service provides a fortnightly subscriber based kerbside collection of garden waste from a 240 litre. As it was a new service it was considered a financial risk to the Council. The contractor provided and invested in the resources to grow the service and manage all complaints and issues associated with the provision of the service. The Contractor also had a proven model and systems with which to operate the service which was working very successfully in other local authority contracts at this time.

However, with the end of the current contract on 31<sup>st</sup> January 2026 and the procurement/start of a new contract, it offers the Council the legal and contractual opportunity to have direct control of the customer base and deliver the service directly. The aim is to provide a high level of customer service, receive income directly from the customer base and control the cost of providing the service.

This option will transition the new contract to a clearer cost modelling approach, where each element of the contract is clear in its cost and offers greater opportunity to control services in alignment with future shifts in legislation and/or Council priorities.

## **3.0 Benefits Summary**

1. Direct control over the customer base, communications and first point of contact customer services. This aligns with other collection services provided under this contract. It represents a customer first service approach rather than a business first approach.

2. Linking garden waste customer services to the Council's own website, contact centre and Cloud 9 app technology
3. Direct control over revenue and fees setting for the service
4. Direct control over service contingency, service disruptions and future changes i.e. driver shortages

## 5.0 Timescales

Following committee endorsing the principle, the project will be initiated in earnest over the next 6 months. The aim is to ensure a seamless transition as from the start of the new contract from 1<sup>st</sup> February 2026. A suitable Customer Relationship Management (CRM) system will be required at least 6 months to the new contract start to ensure transfer of the data from the current incumbent contractor is completed successfully and the CRM system works in conjunction with the contract management system and is fully tested.

Website set up and customer communications will also be a key requirement in the 6-12 months prior to February 2026.

## 6.0 Costs

Costs will be fully established as part of the project management phase. Capital Costs will include the provision of a CRM system. Revenue costs will include project management costs, management resource/customer services, bin replacement contingencies and communications material.

Costs for the collection service to be provided by the contractor will not be known until the contract has been awarded based on the prices outlined in the successful tenderers bid.

Income will be dependent on the level at which customer fees are set for this service. Once fully explored, details of the costs and revenues anticipated for this initiative and subscriber fees will form part of a future budgetary approval report to committee.

## Individual Benefits List

<b>Customer Benefits</b>
1. Improved value for money
2. Direct contact with the Council who own the service
3. Improved service levels as Council can direct contractor to resolve issues in a more efficient way
4. Transparency of service issues
5. Provide a customer focused service

## ADC Benefits

6. Increase in revenue stream to support wider cleansing services
7. Direct control over customer base, communications with customers
8. Transparency of costs and known cost of operation via the contract
9. Ability to make changes that are customer driven

## EQUALITY IMPACT ASSESSMENT

<b>Name of activity:</b>	Procurement of Combined Cleansing Services Contract	<b>Date Completed:</b>	07.02.24
<b>Directorate / Division responsible for activity:</b>	<b>Environment &amp; Climate Change</b>	<b>Lead Officer:</b>	Oli Handson
<b>Existing Activity</b>	<b>Y</b>	<b>New / Proposed Activity</b>	<b>N</b>
		<b>Changing / Updated Activity</b>	<b>Y</b>

### What are the aims / main purposes of the activity?

The procurement of a new Combined Cleansing Services Contract (CCSC) to provide waste collection services to all residents of ADC and street cleansing for the district

### What are the main actions and processes involved?

Scoping and procuring a range of cleansing services via and open tender exercise. Awarding the contract to the successful bidder and mobilizing the new contract in Feb 2026.

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

All residents of the Arun District

### Have you already consulted on / researched the activity?

**Yes, consultation in the form of a trial with resident consultation for food waste collection for 1350 properties based on an area with typical demographic for Arun**

### 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	If Yes, what is it and identify whether it is positive or negative
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	(Yes / No)	
<b>Age</b> (older / younger people, children)	Yes – older people	The Council will continue to offer an assisted collection service for refuse, recycling and food waste collections for people with impaired mobility
<b>Disability</b> (people with physical / sensory impairment or mental disability)	Yes	The Council will continue to offer an assisted collection service for refuse, recycling and food waste collections for people with a disability
<b>Gender reassignment</b> (the process of transitioning from one gender to another.)	No	
<b>Marriage &amp; Civil Partnership</b> (Marriage and registered civil partnerships)	No	
<b>Pregnancy &amp; maternity</b> (Pregnancy is the condition of being pregnant & maternity refers to the period after the birth)	Yes	The Council will continue to offer an assisted collection service for refuse, recycling and food waste collections
<b>Race</b> (ethnicity, colour, nationality or national origins & including gypsies, travellers, refugees & asylum seekers)	Yes	The Council will need to consider how it effectively communicates changes to waste collection services to all residents, including those of different nationalities. This will be considered as part of a detailed communications plan ahead of any services
<b>Religion &amp; belief</b> (religious faith or other group with a recognised belief system)	No	
<b>Sex</b> (male / female)	No	
<b>Sexual orientation</b> (lesbian, gay, bisexual, heterosexual)	No	
Whilst <b>Socio economic</b> disadvantage that people may face is not a protected characteristic; the potential impact on this group should	<b>Yes</b>	It is intended to roll food waste collection services out to all properties including flats and houses of multiple occupation. The food waste collection trial was provided to cover HMO's and in areas of deprivation and provided useful learning in respect of configuration of waste receptacles and communication requirements for such areas.



be also considered		
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What evidence has been used to assess the likely impacts?
Data and learning from the food waste collection trial and current requirements/data for assisted collections

Decision following initial assessment			
Continue with existing planned activity	Y	Amend activity based on identified actions	N

Action Plan			
Impact identified	Action required	Lead Officer	Deadline
The introduction of food waste collections to all properties and the impact on those with impaired mobility/disability	Include assisted collections for food waste in contract specifications	Daniel Cox	Sept 2024
Communicating changes in service to those of different nationalities	Develop a detailed communications plan to ensure all residents have access to information on services	Corporate comms team	Autum 2025

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Monitoring & Review	
<b>Date of last review or Impact Assessment:</b>	07.02.24
<b>Date of next 12 month review:</b>	07.02.25
<b>Date of next 3 year Impact Assessment (from the date of this EIA):</b>	07.02.27

<b>Date EIA completed:</b>	07.02.24
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**Signed by Person Completing:**

Oli Handson

<b>REPORT TO:</b>	<b>Environment Committee – 19 March 2024</b>
<b>SUBJECT:</b>	<b>Bathing Water Quality</b>
<b>LEAD OFFICER:</b>	<b>Karl Roberts – Director Growth</b>
<b>LEAD MEMBER:</b>	Cllr Sue Wallsgrove
<b>WARDS:</b>	<b>Aldwick East &amp; West</b>
<b>CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:</b>	
<p>Improving the wellbeing of Arun by working with partners to ensure bathing water quality standards that encourage use of our bathing waters.</p> <p>Supporting our environment to support us by working with partners to manage bathing water quality and prevent pollution.</p> <p>Fulfilling Arun’s economic potential, by working with partners to ensure bathing water quality standards that help make the best use of natural assets and help support the local economy.</p>	
<b>DIRECTORATE POLICY CONTEXT:</b>	
<p>The Bognor Regis (Aldwick) Bathing Water Quality Partnership Group aims to identify and action the causes of reduced bathing water quality at Bognor Regis Aldwick, thereby helping to improve the social, economic, and environmental wellbeing of the District.</p>	
<b>FINANCIAL SUMMARY:</b>	
<p>There are no financial impacts from the proposals in this report. Funding for an additional automated sign at Pagham has been agreed by Southern Water, in addition to four other signs as previously reported.</p>	

**1.      PURPOSE OF REPORT**

- 1.1      This report provides an update on progress with investigations to identify and address the causes of the Poor bathing water classification at Bognor Regis Aldwick.

**2.      RECOMMENDATIONS**

- 2.1      That the Environment Committee note the progress of the Bognor Regis (Aldwick) Bathing Water Quality Partnership Group and investigations into the Poor bathing water classification at Bognor Regis Aldwick.

### 3. EXECUTIVE SUMMARY

3.1 This report provides an update on the bathing water classification for Bognor Regis (Aldwick) and the actions of the Bathing Water Quality Partnership Group, established to drive the improvement of the bathing water quality and provide assurance and commitment across the partnership organisations.

### 4. DETAIL

4.1 The last report on Bathing Water Quality was made to the Environment Committee on 15 June 2023 and outlined the work already undertaken to investigate and address the causes of the Poor bathing water classification at Bognor Regis Aldwick.

4.2 Since the last report the Bognor Regis (Aldwick) Bathing Water Quality Partnership Group has continued to meet, with further investigations progressed via the technical steering group. These have principally focused on identifying misconnections but have also located and rectified a sewer defect causing potential infiltration to the surface water system, with additional relining works planned. Further sampling has also been conducted and has helped identify more areas for investigation.

4.3 The table below provides an update on the surface water investigations as of 11 January 2024 using information provided by Southern Water.

Location	Manhole cover lift and look	Cage Monitoring	Sampling	Misconnections
Dark Lane area	34 out of 34 completed	Completed	Fluidion sampling for E.coli  Further sampling conducted showing results stable	5 identified and resolved
Silverston Avenue area	37 completed	Completed (12 locations)	Elevated E.coli levels  High ammonia readings upstream to Nelson Road/Crescenta Walk	None identified  Survey upstream being conducted (see below)
Nelson Road/Crescenta Walk area			7 ppm Ammonia	Hole identified in sewer causing infiltration to surface water – patch lining

				completed – September 23  Further lining work commencing 29 January and investigation planned
Marine Gardens area	5 Locations completed	Completed	All Ammonia samples returned 0ppm  Fluidion sampling to be considered  Additional sampling June 2023 – elevated E.coli	None identified
Nyewood Lane area	22 completed	Completed  EA samples detected elevated E.Coli and further cages installed	All Ammonia samples returned 0ppm  Fluidion sampling detected E.Coli (Aug 23) Further targeted sampling required.	None identified  Moving to bottled samples as part of ongoing investigations.
Victoria Road	7 completed  Further lift and look and cage installation planned 2024	Cage monitoring adjacent Park Terrace	Ammonia results returned 0ppm  EA sampling detected elevated E.coli.  Cages and fluidion sampling (August 23) - E.coli detected	Investigations have narrowed location between 2 manholes.  Manhole cover replacement required to facilitate further investigations.

4.4 Investigations have also commenced to consider the potential impact to bathing waters of waste entering road drains, including the potential for toilet waste to be deposited by motorhomes. Whilst there is no direct evidence of motorhomes

using drains in this manner, regular parking in the vicinity of the drains connected to the surface water system has been reported.

- 4.5 Consideration is being given to sampling at potential locations to confirm if contamination is occurring, and the council is also working with Southern Water to implement the principles of the former *yellow fish* campaign to help educate the public about the impact of pollution, with messaging around ‘only rain down the drain’. Many people fail to realise that highway drains connect to the surface water system, which find their way to the sea.
- 4.6 Microbial source tracking of samples collected by the Environment Agency and Southern Water has also been carried out, to help confirm the animal species contributing to microbial contamination of bathing waters. Results are consistent with general findings, chiefly indicating human and seabird markers.
- 4.7 The latest bathing water classifications for 2023 were published on 1 December 2023 and are shown in the table below, with the previous classifications for 2021 and 2022:

<b>Designated Bathing Water</b>	<b>Classification 2021</b>	<b>Classification 2022</b>	<b>Classification 2023</b>
Bognor Regis Aldwick	Good	Poor	Poor
Bognor Regis East	Excellent	Good	Good
Felpham	Good	Good	Good
Littlehampton	Good	Good	Good
Middleton-on-sea	Excellent	Excellent	Excellent
Pagham	Excellent	Excellent	Good

The classifications for 2023 are based on data from the last four year of sampling carried out by the Environment Agency being 2019, 2021, 2022, and 2023. There was no classification in 2020 due to Coronavirus restrictions.

Whilst Aldwick has retained its poor classification the bathing water sampling data from 2023 shows improvements, with a reduced bacterial load, and if the classifications were based on a single year of data, this would have been classified as Sufficient. Since the classification process considers four years of data this unfortunately means it will take longer for the improvements made to impact the classification.

- 4.8 The classifications will be displayed at each location during next bathing season (May to September), with signage at Bognor Regis Aldwick also advising against bathing.
- 4.9 The Bathing Water Regulations 2013 require Local Authorities, during the bathing season, to display information at each designated bathing water detailing the classification and any advice against swimming. Further, as part of our participation in the short-term pollution risk forecasting (PRF) scheme, additional signage is required to be displayed when a PRF is issued.

- 4.10 PRFs are issued during the season at Aldwick, Littlehampton, Felpham and Bognor Regis East. As reported previously automated electronic signs are being installed at each of these locations to eliminate the need to manually place hand-written signs when a PRF is issued. This means information and any advice against swimming is available real-time.
- 4.11 The Environment Agency have confirmed that Pagham will be added to the PRF forecasting for the 2024 season and funding support for an electronic sign to also be included at this location has been agreed by Southern Water. This means additional information will be available at Pagham in 2024, to help residents and visitors make informed choices about bathing.
- 4.12 Officers also recently met with the local MP to seek his support for improved bathing water and pollution information. By integrating existing data sources to provide a single real-time information source it is hope that the public could be better informed when making decisions about when and where to bathe. It has been recommended that Arun's area be used as a proof of concept for this idea.

## **5. CONSULTATION**

- 5.1 No external consultation was conducted.

## **6. OPTIONS / ALTERNATIVES CONSIDERED**

- 6.1 Not to continue participating in the Partnership and technical steering groups. As Arun is not responsible for bathing water classifications or regulating water pollution it is important that we continue to be part of the partnership and work with external agencies to identify and address the causes of pollution impacting the bathing water.

## **7. COMMENTS BY THE GROUP HEAD OF FINANCE/SECTION 151 OFFICER**

- 7.1 No financial impact as Southern water has funded five signs and officers time is met by existing budgets.

## **8. RISK ASSESSMENT CONSIDERATIONS**

- 8.1 Failure to contribute to the work being undertaken to improve bathing water quality at Aldwick may result in a reduced impact. Officers from Arun can offer local knowledge and expertise to support these investigations and ensure they are more effective.

## **9. COMMENTS OF THE GROUP HEAD OF LAW AND GOVERNANCE & MONITORING OFFICER**

- 9.1 There are no specific legal implications.

## **10. HUMAN RESOURCES IMPACT**

- 10.1 There are no direct human resource impacts from the proposals of this report.

## **11. HEALTH & SAFETY IMPACT**

- 11.1 There are no direct health and safety impacts from the proposals. Inclusion of Pagham in the PRF system will provide additional information to help the public make informed decisions about bathing when water quality may be reduced. Further, the improvements already achieved at Aldwick have led to a reduced bacterial load which reduces potential health impacts to bathers.

## **12. PROPERTY & ESTATES IMPACT**

- 12.1 There are no direct property and estates impacts.

## **13. EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE**

- 13.1 There are no direct equalities impacts. Improvements to bathing water quality should encourage use of our beaches by the public and offer positive social and economic value.

## **14. CLIMATE CHANGE & ENVIRONMENTAL IMPACT/SOCIAL VALUE**

- 14.1 There are no direct impacts to climate change, however the improvements achieved at Aldwick have reduced potential pollution of the bathing water and have a positive impact on the environment.

## **15. CRIME AND DISORDER REDUCTION IMPACT**

- 15.1 There are no direct crime and disorder impacts.

## **16. HUMAN RIGHTS IMPACT**

- 16.1 There are no direct human rights impacts.

## **17. FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS**

- 17.1 There are no direct freedom of information or data protection considerations.

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### **CONTACT OFFICER:**

Name: Neil Williamson

Job Title: Environmental Health Team Manager

Contact Number: 01903 737 676



## **BACKGROUND DOCUMENTS:**

Report on Bathing Water Quality to Environment Committee 15 June 2023

[Environment Committee 15 June 23](#)

Report on Bathing Water Quality Report to Environment Committee 31 January 2023

[Environment Committee 31 January 2023](#)

Bathing water quality at Bognor Regis background

[Bathing water quality at Bognor Regis](#)

Environment Agency 2023 Bathing Water Profile for Bognor Regis Aldwick

[Bathing water profile Aldwick](#)

[Bathing Waters Annual Classifications 2023 - Creating a better place \(blog.gov.uk\)](#)

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## Arun District Council

<b>REPORT TO:</b>	<b>Environment Committee – 19 March 2024</b>
<b>SUBJECT:</b>	<b>Arun Flood Forum – Inaugural</b>
<b>LEAD OFFICER:</b>	<b>Karl McLaughlin – Flooding and Coastal Engineering Manager</b>  <b>Philippa Dart – Director of Environment and Communities and Interim CEO</b>  <b>Joe Russell-Wells – Group Head of Environment and Climate Change</b>
<b>LEAD MEMBER:</b>	Councillor Sue Wallsgrove
<b>WARDS:</b>	<b>All Wards</b>
<b>CORPORATE PRIORITY / POLICY CONTEXT / CORPORATE VISION:</b>	
<p>To meet the objectives set out in the Arun Flood Forum - Terms of Reference agreed by the Environment Committee on 21 November 2023.</p> <p>The Terms of Reference can be viewed in <b>Appendix 1</b> attached to this report.</p>	
<b>DIRECTORATE POLICY CONTEXT:</b>	
Response to establishment of the Arun Flood Forum by Full Council on 8 November 2023	
<b>FINANCIAL SUMMARY:</b>	
A sum of £20,000 has been included in the 2024-2025 revenue budget	

### 1 PURPOSE OF REPORT

- 1.1 A report was taken to Full Council on 8 November 2023 following Storm Ciaran which followed unprecedented rainfall in October 2023 and resulted in flooding impacts across the District. Full Council recognised the impacts on residents and business and resolved that the Environment Committee establishes a Forum to review the incident, to investigate and consider the contributing factors, impacts and possible solutions. This report sets out the terms of reference for the Forum.
- 1.2 This report seeks to update the Committee following the inaugural Arun Flood Forum held on 26 of February 2024.
- 1.3 In accordance with its Terms of Reference the Forum will bring recommendations to this committee where they relate to Arun District Council decisions.

## 2 RECOMMENDATIONS

- 2.1 It is recommended that the Committee notes the contents of this report and that the Forum will bring recommendations to the Committee where they require a decision from the Committee and/or a recommendation to Full Council.

## 3 EXECUTIVE SUMMARY

As a result of recent flooding within the District the Arun Flood Forum has been set up to investigate the contributing factors, impacts and possible solutions in a collaborative way. At the first meeting Southern Water (SW) made a presentation to the Forum and a number of questions to SW and other Forum members was asked. This report provides an update following this meeting of the Forum.

## 4 DETAIL

### 4.1 Background

Storm Ciaran arrived on the south coast of England on 2 November following unprecedented rainfall during October. The storm was subject of Yellow and Amber weather warnings for wind and rain impacts. The result was the Environment Agency issuing flood alerts and flood warning across the District and a number of residents and businesses either being flooded or impacted.

On 8 November 2023 Full Council acknowledged the devastating impact of the flooding and unanimously resolved to recommend that the Environment Committee establishes a 'Forum'. It is proposed that the Forum is made up of various partners responsible for flood preparation, planning and response, including the Environment Agency, Southern Water, West Sussex County Council and others and that investigation and consideration be made to the contributing factors, impacts and possible solutions to the flooding events and impacts.

A report recommending Terms of Reference was taken to the Environment Committee on 21 of November 2023 and the Committee amended, debated and approved the document.

It is worth noting that the last 5-month period from October 2023 to February 2024 has been one of the wettest periods on record with over the annual rainfall for West Sussex falling in that period. The full rainfall figures for the area can be seen at **Appendix 2**.

Council officers were then empowered by the Committee to arrange the inaugural Arun Flood Forum meeting which this report gives an update on.

As part of this process we have appointed Simon Wilson of Wilson Sherrif as the independent Chair.

Simon Wilson is a professional facilitator and experienced meeting Chair. He has over twenty years' experience of designing and facilitating workshops, consultations and large conferences both face to face and online. He has particular experience of facilitating discussions around flood and coastal risk management issues for the Environment Agency, lead local flood authorities, coastal partners and other agencies.

## 4.2 Forum Members

In accordance with the Terms of Reference the following individuals have been appointed to represent the respective agency.

Membership on behalf of the District Council was established by Members and their respective political groups.

Membership by Parish representatives was established based on the number of flooding reports and the degree of impact experienced. Many parishes in Arun are impacted by flooding and the Arun Flood Forum will be seeking to address strategic issues which will apply to all parishes.

### **Arun District Councillors**

Cllr Sue Wallsgrove - District Councillor seat  
Cllr Gill Yeates - District Councillor seat  
Cllr Keir – Greenway - District Councillor seat  
Cllr Simon McDougal - District Councillor seat

### **Parish Councillor representatives**

Jonathan Spencer – Chairman Bersted Parish representative seat  
Shirley Haywood – Chairman Middleton on Sea Parish representative seat  
Chris Wells – Barnham & Eastergate Parish representative seat  
Steve Toney – Chairman East Preston Parish representative seat

### **Southern Water**

John Penicud (JP) - Director of Wastewater Operations  
Sue Cobb (SC)- Stakeholder Engagement Manager - Sussex  
Catherine Marriott – Regional Operational Manager - Sussex  
Andy Adams – Catchment Manager

### **Environment Agency**

Claire Francis (CF) - Area Flood and Coastal Risk Manager  
Dave Bonner (DB) - Flood Resilience Advisor  
John Parsonage (JP) - Asset Performance Team Leader  
Michael Carleysmith (MC)– Partnership and Strategic Overview Team Leader

### **West Sussex County Council**

Micheal Elkington (ME) - Head of Planning Services  
Kevin Macknay (KeM) - Drainage and Flooding Lead Professional

### **Arun District Council**

Phillippa Dart (PD) - Director of Environment and Communities / Interim CEO

Joe Russell-Wells (JRW) – Group Head of Environment and Climate Change

## **Chair**

Simon Wilson – Director, Wilson Sherriff

### 4.3 Agency Key Roles and Responsibilities

The Key roles and responsibilities document is provided in **Appendix 3**. This document sets out the key roles and responsibilities with respect to flooding.

### 4.4 Southern Water Presentation

Southern Water gave their presentation, which included the following: -

- Roles and responsibilities
- Overview of the different flooding sources and who manages these.
- Regions and Challenges
- Short and long term challenges
- Wastewater plan by area and enhancements
- Clean River and Sea plan for 2025-2030 (subject to regulatory approval) which outlines the investment planned across the district.
- Role in providing infrastructure for new developments.
- Summary of wastewater treatment works.
- Infiltration reduction plan
- Update on flooding schemes

A copy of the presentation is attached at **Appendix 4**.

### 4.5 Question and answer session

All members of the Forum, District and County Councillors were asked to submit questions prior to the Forum meeting. Written responses to questions were provided at the meeting. Additional queries were asked at the meeting to which some questions were answered. In addition, where questions were not answered at the meeting these were provided with written responses.

A record of all of these questions and answers are provided at **Appendix 5**.

### 4.6 Notes of meeting

The notes of the meeting and action points can be found at **Appendix 6**.

The discussion included future agenda items and presentations to be brought to the next meeting.

## **5 CONSULTATION**

5.1 No further consultation has taken place.

## **6 OPTIONS / ALTERNATIVES CONSIDERED**

6.1 None.

## **7 COMMENTS BY THE GROUP HEAD OF FINANCE/SECTION 151 OFFICER**

7.1 The costs of the proposals in this report are £20,000. The Council's 2024/25 revenue budget was approved by Policy & Finance committee on the 8 February 2024 and by Full Council on the 21 February 2024, and included a provision of £20,000 within the central contingency budget to fund the work of the Arun Flood Forum.

## **8 RISK ASSESSMENT CONSIDERATIONS**

8.1 None to date.

## **9 COMMENTS OF THE GROUP HEAD OF LAW AND GOVERNANCE & MONITORING OFFICER**

9.1 The Arun Flood Forum is a body established by the Environment Committee and the appropriate statutory power for its establishment is the Council's general power of competence under Section 1 of the Localism Act 2011. This report provides an update on the Forum's work and any recommendations that might be required from the Committee and Full Council in the future will be brought to and through the Committee.

## **10 HUMAN RESOURCES IMPACT**

10.1 The newly appointed Flooding and Coastal Engineering Manager will carry the project as part of their caseload. Short-term this will impact their ability to reshape the service but the impact is likely to have diminished following the inaugural meeting.

## **11 HEALTH & SAFETY IMPACT**

11.1 Health and Safety impacts will be assessed as actions from the Forum are proposed and agreed.

## **12 PROPERTY & ESTATES IMPACT**

12.1 Impacts to be assessed as actions from the forum are proposed and agreed.

## **13 EQUALITIES IMPACT ASSESSMENT (EIA) / SOCIAL VALUE**

13.1 The overall objectives of the Working Party is to improve the equalities opportunities and social value as a result of the recommendations.

## **14 CLIMATE CHANGE & ENVIRONMENTAL IMPACT/SOCIAL VALUE**

14.1 To be considered as actions from the Forum are proposed and agreed.

## **15 CRIME AND DISORDER REDUCTION IMPACT**

15.1 Not applicable.

## **16 HUMAN RIGHTS IMPACT**

16.1 To be considered as actions from the Forum are proposed and agreed.

## **17 FREEDOM OF INFORMATION / DATA PROTECTION CONSIDERATIONS**

17.1 Sensitive data will be handled in accordance with the GDPR.

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### **CONTACT OFFICER:**

Name: Karl McLaughlin

Job Title: Flooding and Coastal Engineering Manager

Contact Number: 01903 737814

### **BACKGROUND DOCUMENTS:**

Full Council report 8 Nov 2023

[\(Public Pack\)Full Council - 8 November 2023 - Supplement Two - Urgent Items Agenda Supplement for Full Council, 08/11/2023 18:00 \(arun.gov.uk\)](#)

Environment Committee report 21 November 2023

[\(Public Pack\)Agenda Document for Environment Committee, 21/11/2023 18:00 \(arun.gov.uk\)](#)



## **APPENDICIES**

Appendix 1 – Arun Flood Forum Terms of Reference

Appendix 2 – Rainfall figures for the local area October 2023 to February 2024

Appendix 3 - Agency key roles and responsibilities

Appendix 4 – Southern Water presentation

Appendix 5 –Questions and answers – record of queries raised prior and during the forum meeting and the written answers provided.

**Document will be uploaded as a supplementary document after publication of the agenda but prior to the meeting.**

Appendix 6 – Notes and action points from the Forum meeting 26 February 2024

**Document will be uploaded as a supplementary document after publication of the agenda but prior to the meeting.**

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# **Arun Flood Forum - Terms of Reference**

## **1. Purpose of the Forum**

The main purpose of the Forum is to:

- Understand the issues behind the main flooding events which occurred within the District.
- Understand other recent flooding events which have occurred within the District where homes and businesses have been affected.
- To understand the impact development and climate change have both had on these flooding events.
- To make recommendations on practical and deliverable measures to reduce the impact of flooding on the District's residents, businesses and the environment, and to promote the implementation of permanent and sustainable solutions to mitigate or alleviate flooding.
- The Forum will also seek to improve communication between the flood risk management authorities and representatives from flood affected communities.
- To highlight and signpost to residents funding opportunities, and help educate residents about what more they can do to protect their own properties.

## **2. Scope**

The Forum will focus on areas of flood risk resulting as determined by the Forum.

## **3. Objectives**

The Forum will work to:

- Clearly establish the impact of flooding following the events following Storm Ciaran
- Clearly identify the highest risk areas to flooding resulting from the above review – which communities and businesses are at highest risk.
- Hear from communities and businesses affected by the flooding events.
- Understand the relationship between new developments and the functional flood plan, how they are drained and the impact on existing built up areas.
- Understand the various agencies roles and responsibilities in dealing flooding both in terms of prevention and solutions.
- Set out measures to mitigate these risks, from those already established and identify additional measures to assist in future flooding events.
- Consider the key agencies' responsibilities and their working relationships with the Council and each other.
- Establish what arrangements there are for involving and consulting local communities in determining flood prevention plans and in flood response and recovery arrangements.
- Ensure that partners' own organisations are aware of and can respond to flood related issues within their assigned duties and resources.
- Review procedures for flood prevention, response and recovery.
- Arrange periodic and appropriate training or information exchange for relevant personnel, including partners' own workforces, emergency services, volunteers and other stakeholders on the operational aspects of flood risk management.

- Make recommendations for appropriate action by the Council and partner agencies.
- Actively address funding opportunities to support projects / proposals resulting from the Forum.
- Ensure that the Council's interests are represented at regional and national level in respect of flood policy development and funding.

#### **4. Membership**

- The Forum will be chaired by an independent professional.
- Up to 4 District Councillors from flood affected wards (with not more than one representative from each ward). All other **District and County Councillors** are able to attend to observe and ask questions.
- Up to 4 Parish Council representatives, who should be the Chair or Vice Chair of their Parish Council, (with not more than one representative from each parish)
- Appropriate officer representation from Southern Water
- Appropriate officer representation from the Environment Agency
- Appropriate officer representation from West Sussex County Council as the Lead Local Flood Authority
- Relevant officer representation from Arun District Council
- The group may co-opt representatives of other organisations to sit on the group as appropriate.

#### **5. Meetings and frequency**

- The group will meet 4 times per year or as determined by the Forum.
- All meetings to be held in person.

#### **6. Leadership and Governance**

- The Forum would not be a committee, sub-committee or working party of the authority. Instead, it would be a body established by the Environment Committee and the appropriate statutory power for its establishment would be the Council's general power of competence under Section 1 of the Localism Act 2011.
- Agendas and minutes of the Forum meetings will be reported to Environment Committee.
- Forum attendees will determine for themselves how they wish to report back to their own organisations and communities on the work of the group.
- Attendance Forum meetings provides no undertaking or commitment by any member organisation to make available funding for any scheme or proposal, but representatives will use their best endeavours to secure funding from appropriate sources.
- ADC will provide secretariat services for the Forum.

#### **7. Decision-Making Process**

- The Forum will make recommendations to Environment Committee where they relate to ADC decisions. It will have no decision-making authority.

## **8. Communication**

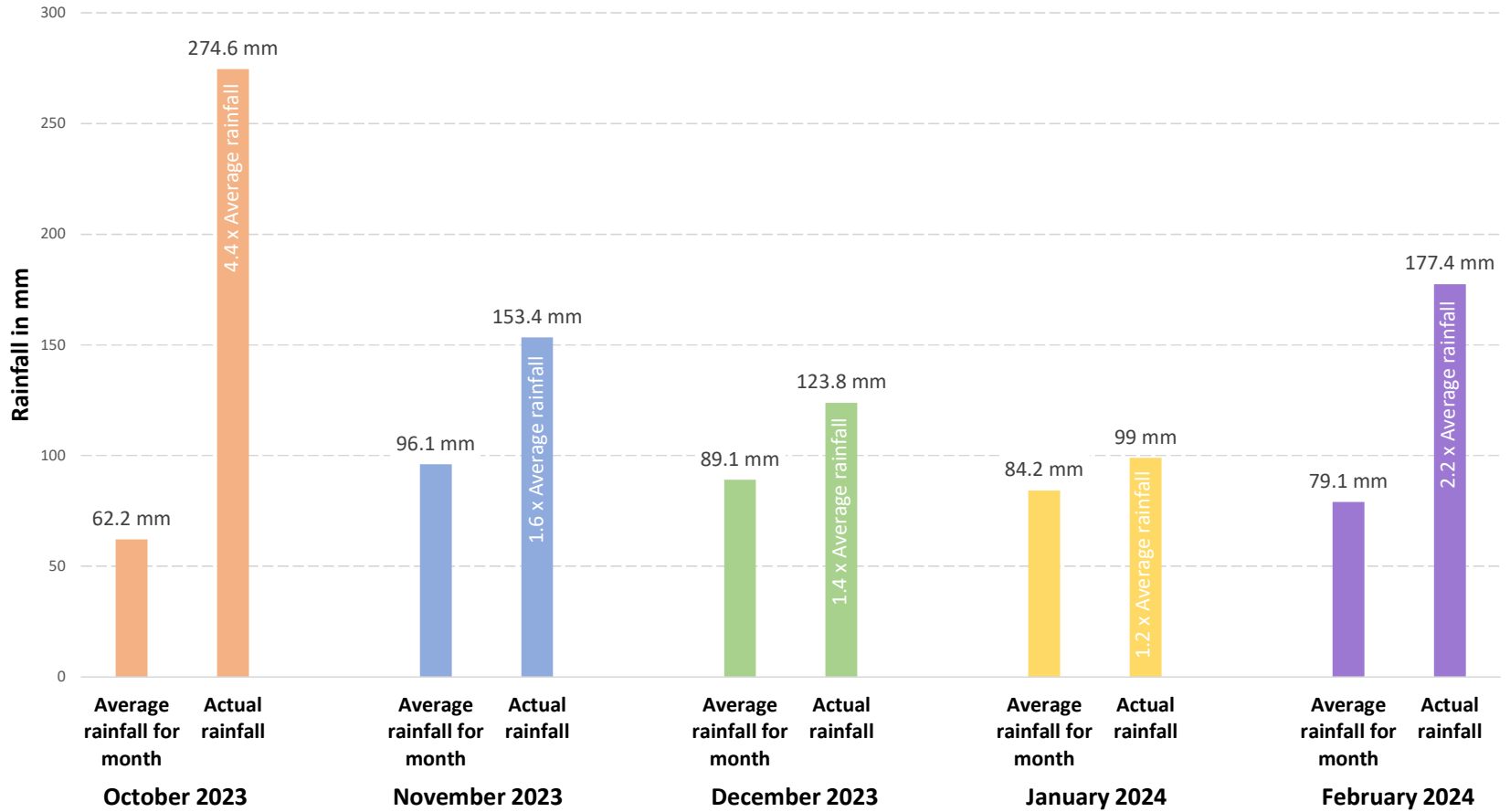
- Communication resulting from the Forum meetings will be shared through ADC Communications team.

### **Proposed Forum topics**

- To hear from affected communities and business representatives
- National Flood Forum experience, role and responsibilities
- Environment Agency (EA) responsibilities and actions
- Southern Water (SW) responsibilities and actions
- ADC responsibilities and actions
- WSCC (Lead Local Flood Authority (LLFA)) responsibilities and actions and ADC's role
- Impact of planning and development
- Landowners responsibilities and actions

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**Rainfall Figures for Bognor Regis,  
October 2023 - February 2024**



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## Arun Flood Forum – R&R Document



Arun District Council are the Local Authority and the Planning Authority

### **Local Authority Responsibilities**

Carry out flood risk management works on minor watercourses, working with LLFAs and others.

In coastal areas, they also act as coastal erosion risk management authorities.

### **Emergency Planning roles and responsibilities:**

#### **Preplanning**

- develop and maintain site-specific multi-agency flood plans for identified high risk locations
- maintain plans for rest centres
- prepare for evacuation
- advise on development proposals

#### **Response During Flood**

- operate and maintain own flood defence assets
- clear blocked watercourses as appropriate under Land Drainage Act powers
- coordinate local scale incidents
- promote local Environmental Health monitoring and management
- implement rest centre plans
- liaise with water supply companies to identify water distribution locations

#### **Recovery/Post event**

- lead recovery phase where only Arun district has been affected (where two or more District/ Boroughs are affected County Council to coordinate recovery)
- identify lessons to be addressed

### **Planning Authority Responsibilities**

The planning authority is often the local borough or district council. National park authorities and the Broads Authority are also local planning authorities.

They are responsible for developing Local Plans, setting out how areas will develop in the future.

They also make decisions through Planning Committees on which planning applications get approval.



The Environment Agency are responsible for taking a strategic overview of the management of all sources of flooding and coastal erosion and are responsible for managing the risk of flooding from main rivers, reservoirs, estuaries and the sea.

They issue flood warnings through Floodline, 0345 988 1188.

They also provide information on areas at risk of river and coastal flooding through flood risk maps.



Water and sewerage companies are responsible for managing the risks of flooding from piped water and foul or combined sewer systems providing drainage from buildings and yards.



West Sussex County Council are both the Highway Authority and Lead Local Flood Authority in Arun.

**Highway Authority responsibilities**

Responsible for providing and managing highway drainage and roadside ditches. They must ensure that road projects do not increase flood risk. Highways England is responsible for motorways and major trunk roads. Local authorities or national park authorities are responsible for other roads.

**Lead Local Flood Authority Responsibilities (LLFA)**

LLFAs are Unitary or Country Councils and are responsible for coordinating flood risk management in their area.

Are responsible for managing the risk of flooding from surface water, groundwater and ordinary watercourses and lead on community recovery.

They are responsible for maintaining a register of flood risk assets and surface water risk.

If a flood happens all local authorities must have plans in place to respond to emergencies.

In accordance with Section 19 of the Flood and Water Management Act 2010, the LLFA must, to the extent that it considers necessary or appropriate, investigate flooding in its area. Following the flooding event in 2012 WSCC provided an initial guide to define the parameters which it might consider a section 19 report necessary. - [Microsoft Word - Final Report.doc \(westsussex.gov.uk\)](#)





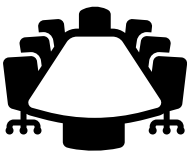
### **Property Owners**

People are responsible for looking after their own property, including reducing the risks of water entering it and of causing damage. Therefore, it is important that people are aware of their flood risk and take measures to better protect themselves, where appropriate.

The drainage pipes located beneath your house, garden or driveway belong to you and are your responsibility. This stops being your responsibility the moment they reach outside the boundary of your property and/or connect to pipes serving another property. So, if there's a problem with a private drain or sewer, it's up to you to pay for an independent drain clearing company to carry out any

### **Riparian Owners**

If you own land or property next to a river, stream or ditch you are a riparian owner and have responsibilities to maintain the waterway but also rights to protect your property from flooding. For more information speak to your local authority land registry dept. or download guidance from the Environment Agency's *Owning a watercourse*.



### **Internal Drainage Boards (IDB)**

IDBs are independent public bodies responsible for water level management in low lying areas (approximately 10% of England at present), working in partnership with other authorities.

There is only one IDB in the Arun District and this is currently administered by the Environment Agency.

# Arun Flood Forum

February 26 2024

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## Our role and responsibility

- It's our responsibility to ensure our customers can continue to use their wastewater services.
- Our priority is to keep our sewers flowing and manage the flows they are built to carry, such as waste from toilets, sinks, showers and washing machines, as well as rainwater from roofs and driveways.
- The part we play is around the wastewater function of what we do. Our job – when it comes to preventing flooding – is to manage those sewers so the contents continue to flow through them.

### Surface water flooding

- Lead local flood authorities (county councils or unitary authorities) manage the risk of surface water flooding

### Private drainage (surface water)

- These pipes are the responsibility of the home owner

### Highway drainage

- The local highway authority (county councils or unitary authorities) is responsible for highways drainage, and gullies, on the roads they maintain
- Highways England is responsible for highways drainage on trunk roads and motorways

### River and coastal flooding

- The Environment Agency manages flood risk from main rivers and the sea and also monitors the quality of watercourses
- The local lead flood authority (county councils or unitary authorities) manage flood risk from ordinary watercourses
- Internal Drainage Boards manage water levels of ordinary watercourses in areas known as internal drainage districts
- Waterside property owners have certain legal rights and responsibilities to maintain watercourses (including drainage ditches) which run through or adjacent to their land or property

### Groundwater flooding

- Lead local flood authorities (county councils or unitary authorities) manage the risk of groundwater flooding

### Private drainage (foul)

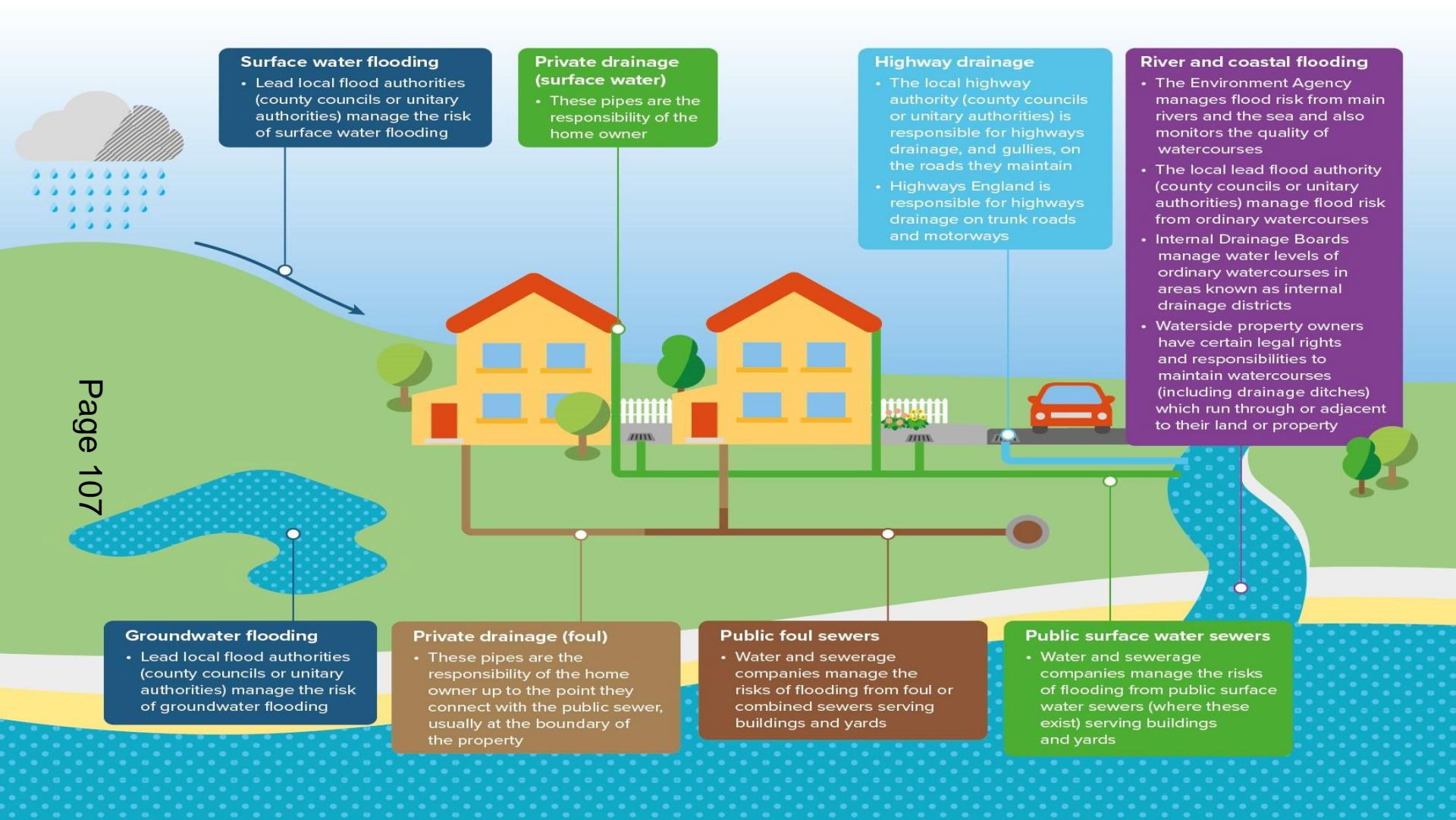
- These pipes are the responsibility of the home owner up to the point they connect with the public sewer, usually at the boundary of the property

### Public foul sewers

- Water and sewerage companies manage the risks of flooding from foul or combined sewers serving buildings and yards

### Public surface water sewers

- Water and sewerage companies manage the risks of flooding from public surface water sewers (where these exist) serving buildings and yards





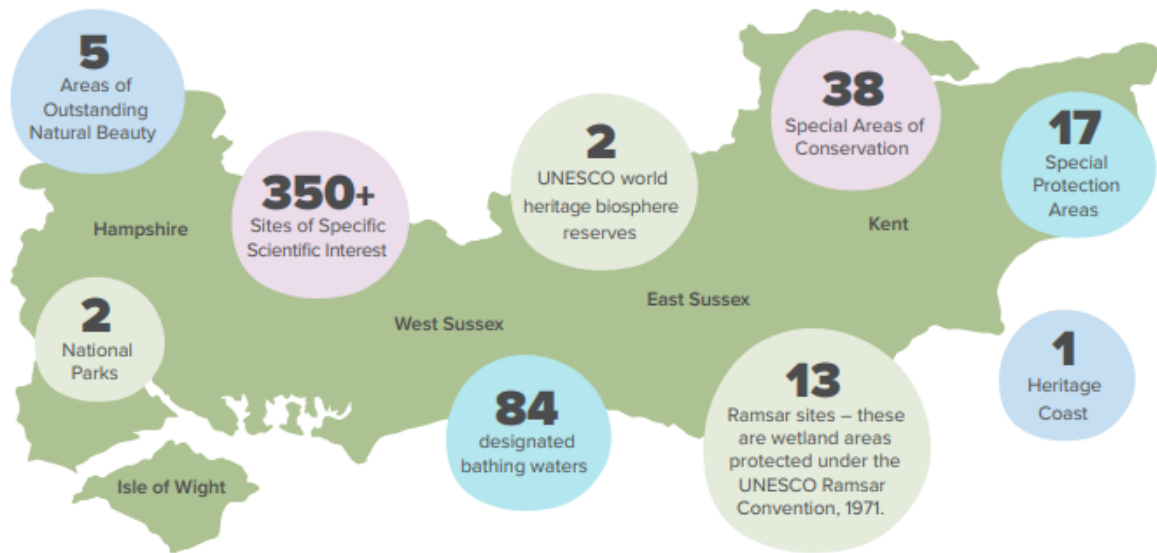
# Our region and challenges

- Densely populated with unique water environments and more than 700 miles of coastline
- Our region is water stressed, scarcity is becoming more severe as our climate changes and population grows

**19-25%** population growth expected by 2050.

**£12 billion** per year\* in tourism revenue relied on by coastal and inland communities across our region.

\*Source: [tourismsoutheast.com](http://tourismsoutheast.com)



Climate change



Demand for water



Environmental impacts



Population growth



# Our PR24 plan delivers a step-change in investment to meet our short and long-term challenges

## Water quantity

- We could need an **additional 300 million litres per day by 2050**
- We need to significantly **reduce how much we abstract** from Hampshire's chalk streams
- We need to **halve leakage by 2050**
- The **population we serve could grow between 6% and 32%** between 2025 and 2075
- We need to **increase our resilience to a 1 in 500-year** drought and droughts will become more frequent in the future

## Environment

- We need to **remove 80% of phosphorous** entering water by 80% by 2038
- We need to **reduce how much we use stormwater overflows** to protect shellfish and bathing waters
- **Nutrient neutrality** is blocking growth
- We need to **reduce serious pollution incidents** to zero – and improve our pollution performance
- Need to **increase capacity and capabilities** to cope with population growth

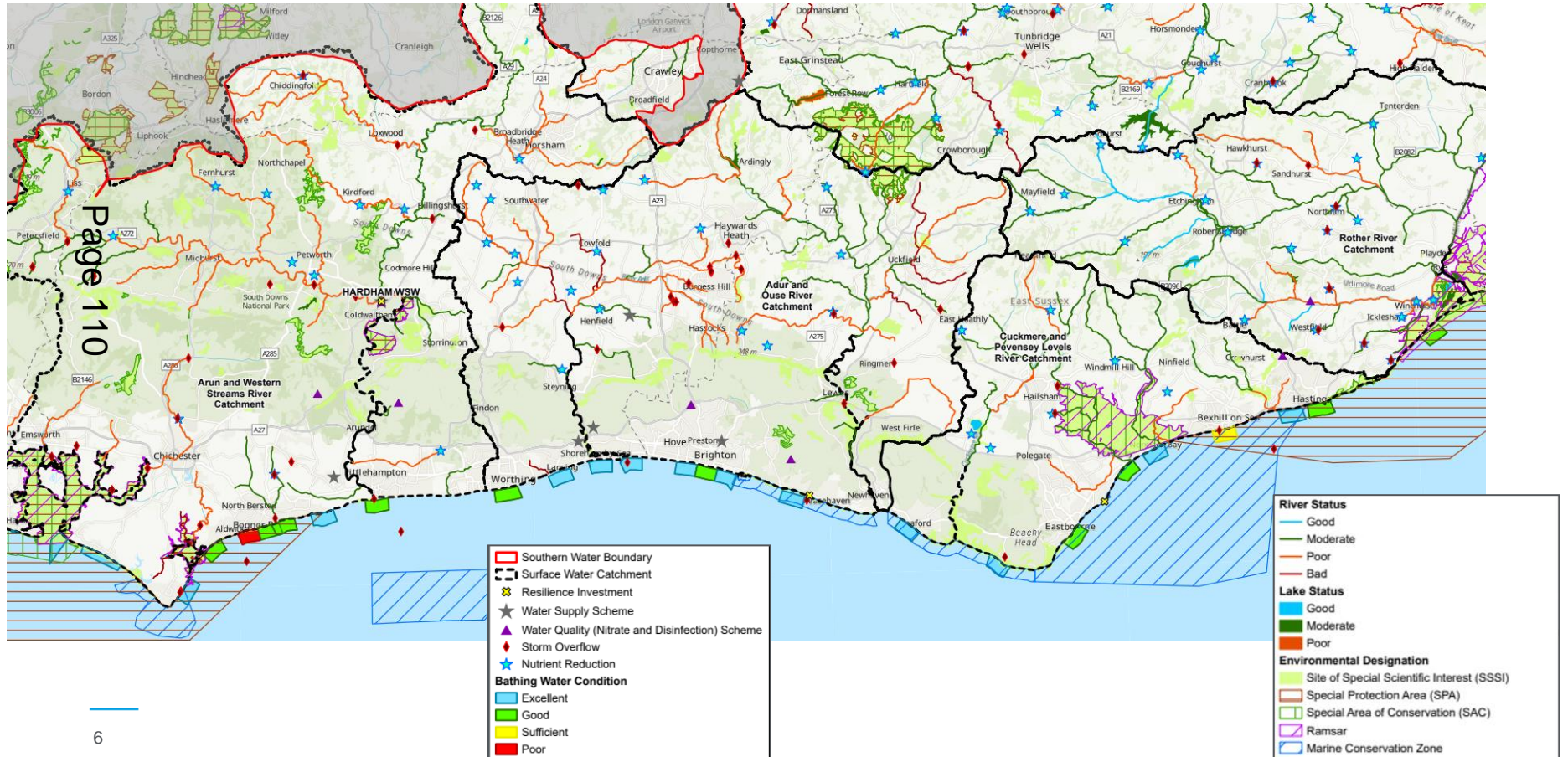
## Resilience

- We need to **protect the environment** for future generations
- We need to manage **increase costs** of labour, materials and energy
- Increased borrowing costs and increased political pressure can make the **sector less attractive** to investors
- Climate change means **extreme weather events** will be more severe and more frequent – challenging our day-to-day operations
- **Ageing infrastructure** needs upgrading and replacing

## Customers and stakeholders

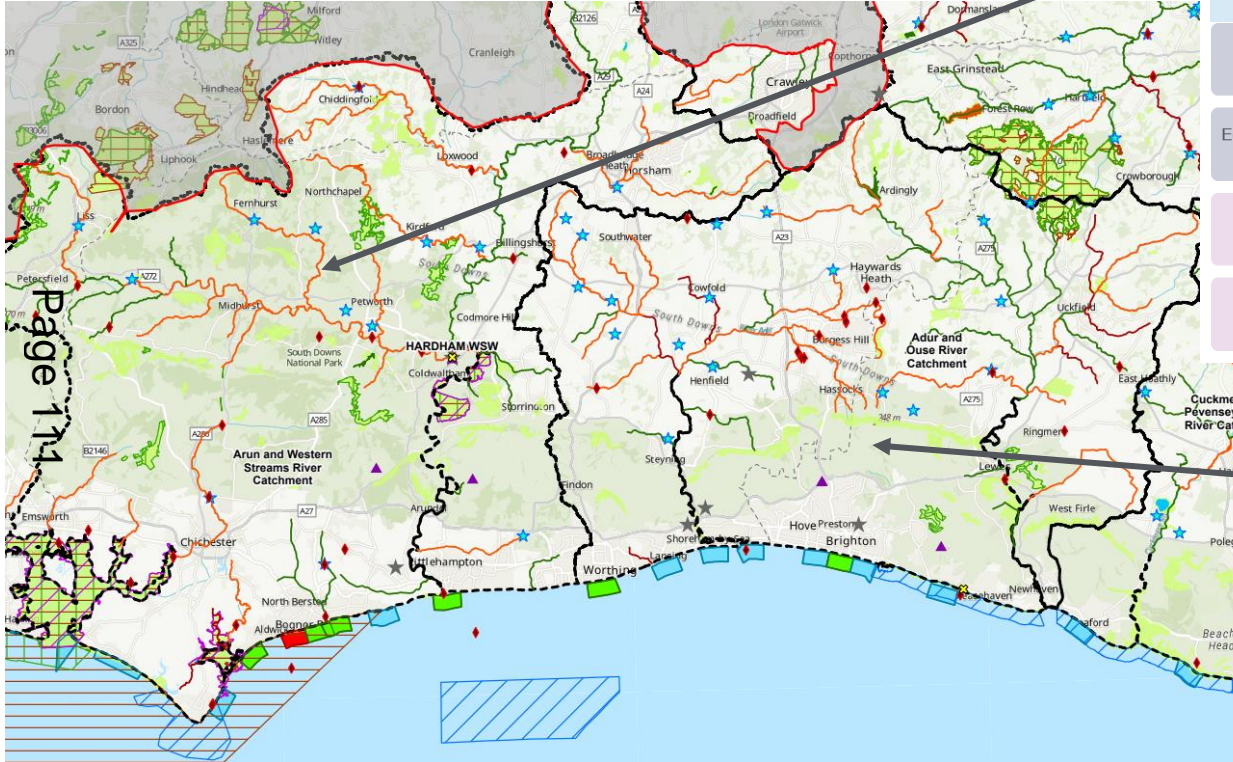
- We need to keep **bills affordable** while investing in improvements. Cost of living challenges mean this is more important than ever
- The whole sector needs to **improve trust and its reputation**
- Rising expectations are driving regulatory changes and **increasing political pressure** that we need to adapt to
- Changing **expectations for customer service** mean we're expected to do things differently

# Our Wastewater Plan by area





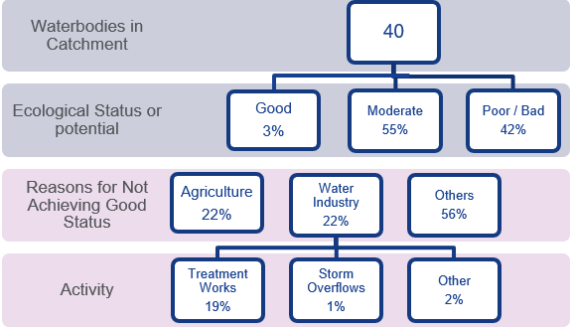
# West Sussex enhancements



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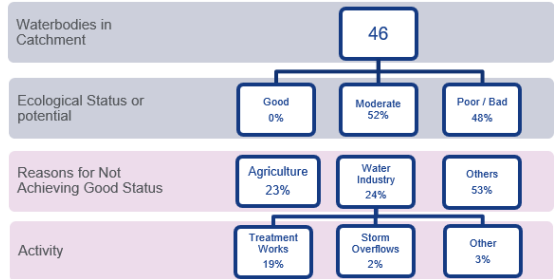
### Arun & Western Streams

- Nutrient reduction at 12 sites
- Storm overflows at 26 sites
- Length of river improved 145km
- 60% reduction in storm overflow discharges
- Total environmental investment £300m



### Adur & Ouse

- Nutrient reduction at 18 sites
- Storm overflows at 19 sites
- 1 coastal resilience scheme
- Length of river improved 135km
- 32% reduction in storm overflow discharges
- Total environmental investment £160m



## Our Clean River and Seas plan for 2025-2030 (subject to regulatory approval)

- **£88.32 million – catchment of Bognor Regis Wastewater Pumping Station** - to tackle too much groundwater getting into the network. Likely to include 36.15 hectares of wetlands and 136.31 km of sewer relining in both public and private pipes
- **£1.22 million – South Terrace, Littlehampton** – to tackle the issue of too much rainwater getting into the system
- **£4.18 million – Bognor rising main** – likely that multiple interventions will be needed
- **£8.67 million – catchment of Lidsey Wastewater Treatment Works** – too much groundwater getting into the system. Likely to include 3.27 hectares of wetlands and 15.71 km of sewer relining
- **£5.8 million – catchment of Littlehampton Wastewater Pumping Station** – likely to include 2.32 hectares of wetlands and 8.76 km sewer relining
- **£1.07 million – Marshall Close, Barnham** – multiple interventions
- **£1.89 million - catchment of Pagham Wastewater Treatment Works** – to tackle too much rainwater getting into the network. Likely to include the removal of c. 1 hectare of impermeable land by installing sustainable drainage systems (SuDS) in the community. Work is already taking place on site within this AMP (2020-2025)

## Our Role in providing Infrastructure for New Developments

- We review the cumulative impact of growth over 25 years when producing our Drainage and Wastewater Management Plans
- Statutory Consultee at Local Plan Stage – we provide general advice on sewer capacity for each proposed site.
- Although not a statutory consultee at planning application stage as a general rule we are consulted. We advise on sewer capacity at the proposed connection point. We advise whether there is headroom available for the proposed flows. Where there is not available headroom we recommend a form of words to be used in a planning condition for the site
- We cannot object to development and have to provide a connection to the public sewer when requested, as long as the mode of connection is appropriate.
- A project to create headroom is initiated when planning approval is granted. We then consult with developers to understand their programme and when capacity is required by.
- The creation of headroom is funded through a standard infrastructure charge which all developers pay
- Improvements to WTW are funded through our 5 yearly business plans

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# Actions across the district

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# Barnham

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## Summary of work at Lidsey Wastewater Treatment Works (WTW)

### We're upgrading the WTW to achieve two things:

- Provide treatment capacity at the WTW for forecast growth to 2040 (from c. 25,500 PE to c. 36,300 PE)
- Prevent spilling to storm during dry weather

### The following scope is being delivered:

- Upgrade existing inlet WPS to pass forward Formula A flows. We are carrying out flow surveys in the catchment to confirm the design capacity of this pumping station.
- Replace the existing inlet works with new, to treat flows based on above.
- Increase the Flow to Full Treatment of the WTW from 129l/s to 275l/s.
- Upgrading wastewater treatment process to treat above (replacing existing treatment process with an Activated Sludge Plant, new tertiary treatment process, increased storm storage capacity).
- Work in the catchment to reduce non-foul flows entering the sewer and arriving at the WTW, to prevent spills to storm during dry weather.
- The above is currently forecast to be delivered by Q3 2027, and the WTW is assessed to have capacity until the end of 2028 according to the development figures given in the council Local Plan.



## Lidsey Group 3 scheme

- For group 3 we are completing a number of surveys in Lidsey with a focus of finding the major areas of infiltration, these include electroscan, flow surveys and asset surveys.
- Our current goal is to complete design by end of AMP7 (2025) for the wider catchment.
- Unfortunately Lidsey is an area with multiple historic issues which have to be solved in tandem with growth, this makes potential options large and not something that can be solved over night

## Infiltration Reduction Plan

- Due to geology and soil type, high groundwater and sustained rainfall can cause issues with drainage as these flows can enter the system through poorly jointed pipes or from submerged manhole covers and drainage gullies.
- Due to the impact groundwater has on the sewer system performance we have an Infiltration Reduction Plan approved by the EA. The plan explains our approach to addressing infiltration into the sewers and the occasional need for operational methods to maintain service to customers such as tankering flows and overpumping.
- The issues are across a wide area and with many kilometres of public and private drainage affected.
- Our plan is to systematically target parts of the sewerage system to survey and then act on any points of ingress identified
- We believe the system as a whole to be further compromised by the land drainage in the area which may contribute to a higher groundwater table and increased surface flooding which affects the wastewater system.
- As well as a sewer sealing programme we believe a multi-stakeholder approach to address the holistic system would be required to increase resilience to high groundwater and prolonged rainfall.

# Shripney

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# Shripney Village – Group 1 Flooding Scheme

## What has been done

- WPS Upgrade to increase Passforward rate to 15l/s from 8. This has since reduced.
- Thorough cleaning and inspection of Shripney Village WPS to determine why 15 l/s was not maintained (22.02.24) – Awaiting Outcome
- Installed a Flow Monitor to understand rate and volume of flow incoming from Saltbox Development.

## What is planned – Completion by end of Nov

- ElectroScan Surveys w/c 11<sup>th</sup> March to detect groundwater infiltration and Subsequent re-lining (if required)
- Manhole surveys and sealing
- Connectivity survey to identify residential connections and mitigation (Water Butts)
- Enforcing the S106 agreed flows from Saltbox (5 l/s) and ‘Foul-only’ (e.g. saltbox) if required
- Installing a Snorkel on RM air valve



# Summary: Other areas in Arun

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- **South Terrace – Littlehampton.** Following internal property flooding we are working with Arun DC and WSCC to better understand the flows in the system, how the systems interact and flood mechanism. This includes building and verifying against a flow survey a hydraulic model of the surface water system. This is in progress and we will continue to work with other stakeholders to identify alterations to drainage that might be necessary to reduce flood risk.
- Regular meetings have been held with residents and Nick Gibb(MP) since the internal flooding of approx. 20 basement flats in Oct 2021 and a series of measures through flood mitigation have been installed to increase protection levels from future flooding..
- These measures on the s24 sewer serving South Terrace include removal of some roof drainage , installation of three pumped Anti Flood devices (AFDs) on each lateral joining to the main, gravity AFDs and the installation of flood barriers at the front of all properties to prevent overland flooding and bow waves from the road washing into the basements.
- The Flood Mitigation is approx. 95% completed and should be completed in the next few weeks.
- There has also been extensive CCTV and investigations into the foul sewers searching for anything that could have attributed to the flooding (nothing found). Also investigations into the performance of the three pump stations , South Terrace, Foreshore & Sea Road all of which were found to have operated to design with no failures.

- **Limmer Lane, Bognor.** We meet with the Summerley Estate Management Company and partner organisations (Arun DC, WSCC) to understand how the systems interact, root cause of flooding and opportunities to reduce flood risk. Modelling currently ongoing but this problem is complex including surface water connections to foul system, land drainage, poor soakaway potential.
- **Elmer Sands.** Historically this area suffered from flooding and restricted toilet use due to a combination of factors. Improvements were made 15 years ago to address poor land drainage, separate surface water from foul, address infiltration to the sewers and improve the resilience of the wastewater pumping station. As far as we are aware this was successful for a number of years but it appears that this problem has returned and a multi-agency review is required to understand what has changed.



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# Public Document Pack Agenda Item 10

Subject to approval at the next Free Parking Scheme Review Working Party meeting

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## FREE PARKING SCHEME REVIEW WORKING PARTY

5 February 2024 at 6.00 pm

Present: Councillors Wallsgrove and Wiltshire

Councillor Francis Oppler (nominated representative from Bognor Regis Town Council), Councillor Bob Waterhouse (nominated representative from Bognor Regis Town Council), Councillor Freddie Tandy (nominated representative from Littlehampton Town Council), Councillor Alan Butcher (nominated representative from Littlehampton Town Council), Heather Allen (nominated representative from Bognor Regis BID), Mike La Traille (nominated representative of Littlehampton traders)

Councillors Brooks and Pendleton were also in attendance for all or part of the meeting.

### 1. WELCOME AND INTRODUCTION

The Group Head of Technical Services opened the meeting, and welcomed Members, nominated representatives, Officers and other Councillors in attendance to the meeting.

Introductions were made, and it was confirmed the membership of the Working Party would be made up of the following:

Councillor Sue Wallsgrove	Arun District Council Environment Committee Member
Councillor Amanda Worne	Arun District Council Environment Committee Member
Councillor Keir Greenway	Arun District Council Environment Committee Member
Councillor Christine Wiltshire	Arun District Council Environment Committee Member
Councillor Francis Oppler	Bognor Regis Town Council
Councillor Bob Waterhouse	Bognor Regis Town Council
Councillor Freddie Tandy	Littlehampton Town Council
Councillor Alan Butcher	Littlehampton Town Council
Heather Allen	Bognor Regis BID
Mike La Traille	Littlehampton Trader

2. APPOINTMENT OF CHAIR AND VICE-CHAIR

The Working Party

RESOLVED that

- 1) Councillor Wallsgrove be appointed as Chair
- 2) Councillor Wiltshire be appointed as Vice-Chair.

3. APOLOGIES FOR ABSENCE

Apologies for absence had been received from Councillors Worne and Greenway.

4. DECLARATIONS OF INTEREST

Heather Allen, from Bognor Regis Business Improvement District (BID) wished it to be recorded that the Bognor Regis BID were in receipt of payment for services in distribution.

Councillor Wiltshire declared a Personal Interest in all items of the meeting as a Member of Littlehampton Town Council.

5. START TIMES

The Working Party

RESOLVED

That its Start Times be 6.00 pm.

6. WORKING PARTY TERMS OF REFERENCE

Upon the invitation of the Chair, the Group Head of Technical Services presented the report. He reminded attendees that at the Environment Committee meeting on 07 September 2023, a decision was made to establish a Working Party to 'comprehensively review the free parking scheme and report its recommendations to the Committee as soon as possible. The membership of the Working Party shall be made up of the Chair and Vice-Chair of the Environment Committee plus three other Committee Members, two named representatives from each of Bognor Regis and Littlehampton Town Councils, a named representative of the Bognor Regis Business Improvement District and a named representative of Littlehampton traders.'

The Group Head of Technical Services then detailed the Terms of Reference in Appendix A, explaining that the shaded text were areas that had been determined by the Arun District Council (ADC) Environment Committee, and the unshaded text could be determined by the Working Party. He also went through Appendix B, which was the suggested timetable for the Working Party, highlighting that members of the Working Party were encouraged to assist in gathering suggestions and evidence, and asked for this to be sent to Officers in advance of the next meeting.

The Chair invited questions and it was asked whether the focus of the Working Party was restricted solely to the free parking schemes. The Group Head of Technical Services explained that the Environment Committee had established the Working Party to comprehensively review the free parking scheme and make recommendations to the Environment Committee. However, if an alternative model was suggested, this would also fall under the remit of the Working Party and could form the basis of those recommendations.

#### The Working Party

#### RESOLVED

That the Terms of Reference (as below) and Timetable in Appendix B be agreed.

Purpose	<p>To comprehensively review the two free town centre parking schemes and make recommendations to ADC Environment Committee on what should follow the existing schemes.</p> <p>Proposed objectives of a future scheme:</p> <ul style="list-style-type: none"><li>• Supports footfall in the town centres of Bognor Regis &amp; Littlehampton</li><li>• Makes use of appropriate technology</li><li>• Minimises administration costs</li><li>• Ensures accessibility</li><li>• Prevents misuse</li><li>• Obtains usage and foregone parking revenue data to allow cost benefit to be evaluated</li><li>• Attenuates ADC parking revenue losses having regard to the Council's financial position.</li></ul> <p>Proposed matters to consider:</p> <ul style="list-style-type: none"><li>• Duration</li><li>• Method of delivery: cardboard disc, scratch cards, app, phone call activation, ANPR.</li><li>• Eligibility</li><li>• Accessibility</li></ul>
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Reporting	<p>The Working Party to make recommendations to the Environment Committee of Arun District Council. The Working Party will have no decision-making authority.</p> <p>The Chair to provide verbal updates to the Environment Committee on progress after each Working Party meeting to the ADC Environment Committee.</p>
Nominations to seats	<ul style="list-style-type: none"> <li>• ADC Environment Committee Chair</li> <li>• ADC Environment Committee Vice Chair</li> <li>• 3 additional Members of the ADC Environment Committee, to be agreed by Group Leaders</li> <li>• Littlehampton Town Council to appoint 2 named representatives</li> <li>• Littlehampton trader representative</li> <li>• Bognor Regis Town Council to appoint 2 named representatives</li> <li>• The Bognor Regis Business Improvement District to appoint 1 named representative</li> <li>• No substitutions are permissible.</li> </ul>
Chair and Vice-Chair of the Working Party	<p>To be elected by the voting Members of the Working Party (Chair and Vice-Chair must be ADC Environment Committee nominees/Members)</p>
Process	<p>The 5 ADC Environment Committee nominees/Members (only) have voting rights</p> <p>The Working Party to meet on three occasions (February, May &amp; July) at Arun Civic Centre.</p> <p>Meetings will be held in private</p> <p>Will receive, gather and consider information.</p> <p>Begin to formulate recommendations at the second meeting.</p> <p>Finalise recommendations to Environment Committee at the third meeting.</p>

7. PRESENTATION FROM THE GROUP HEAD OF TECHNICAL SERVICES AND NEXT STEPS

Upon the invitation of the Chair, the Group Head of Technical Services, Parking Service Manager and Principal Parking Services Officer gave their presentation to the Working Party, a copy of which was handed out to all attendees of the meeting.

The presentation covered:

- Aim of the Scheme
- History of the Scheme in Littlehampton
- History of the Scheme in Bognor Regis
- Why Changes Were Needed
- The 2024 Littlehampton Disc Scheme (including virtual discs)

- The 2024 Bognor Regis Disc Scheme (including virtual discs)
- Comparison of the Disc Schemes
- Limitations of the 2024 Schemes
- How to Purchase and Use the 2024 Parking Discs (including a video showing how customers activated a virtual parking disc stay via the MiPermit App).
- Communications Regarding the Scheme
- 2024 Scheme – Financial Overview
- Question and Next Steps.

During the ‘Questions and Next Steps’ section of the presentation, the Working Party took part in a discussion and the following points/suggestions were raised:

- Some felt the 2024 Bognor Regis scheme was not working as well as the previous schemes had. The Group Head of Technical Services explained customers wishing to buy cardboard discs still did this in the same way, with the only difference being these were now at a cost of £3 instead of £2.
- Some noted that introducing a £3 annual fee for the 2 hour free parking disc in Littlehampton had not caused the upset that had been anticipated.
- The app was difficult to use, and cardboard discs should be retained.
- Bognor Regis BID had sold out of the first batch of discs and one Councillor was unhappy as he was concerned printing additional discs would be at greater cost. It was confirmed these had been re-ordered quickly by Arun Officers, and were due to arrive shortly.
- There was concern there would be a loss of income to retailers. The Group Head of Technical Services confirmed the pence per disc margins remained the same for retailers, so there was no revenue lost to them during the sale of the discs, however it was acknowledged people buying virtual discs would not be purchasing cardboard discs from a shop.
- It was felt there was a split between people that would find the app easy to use, and those that would not try using it and would always want to purchase cardboard discs.
- A suggestion was put forward that the cardboard discs should cost more to purchase than a virtual disc. An example given was that the cardboard discs could cost £4.50, with virtual discs costing just £1. It was felt this would encourage more people to use the app, which was cheaper for the Council to operate, but retailers would still benefit from a large number of people purchasing cardboard discs. Another member of the Working Party thought this approach would reduce new footfall into shops from those people looking to purchase cardboard discs. He had recently seen 30-40 new customers visiting his shop looking to purchase discs and making other purchases whilst they were there.
- Most members of the public were not unhappy about the new £3 charge, and some had said they would be happy to pay £5.
- Further information on the sales of the discs was requested, which was provided by Officers as follows:
  - Littlehampton – 9203 cardboard discs, 649 virtual discs sold

- Bognor Regis – 21092 cardboard discs, 409 virtual discs sold
- It was asked whether flexibility could be given to parents whilst dropping off and picking up from schools, which was an issue now the discs could only be used once per day. Officers were working closely with West Sussex County Council around safe travel to and from schools.
- Were Arun using both Ringo and MiPermit apps? Officers confirmed this was the case. Many residents of Bognor Regis were already familiar with MiPermit which was used for resident parking permits. Ringo was widely used nationally, so Officers had wanted to ensure customers had a choice of which app to use. 49% of people paying for parking in Arun car parks were paying by phone (including use of the apps) even though this incurred additional costs. As well as the apps, there was also an option to call a phone number to pay, and for an additional cost a reminder could be requested.
- It was noted there were less retailers selling the cardboard discs in Littlehampton than Bognor Regis. Officers updated that since the launch, more retailers had expressed an interest in selling discs, however as publicity material had already been printed, it had not been possible to include them. It was hoped the cardboard discs would be available in more locations in Littlehampton next year.
- It was noted that the wishes of the businesses in Bognor Regis Town Centre were that cardboard discs continued to be sold through retailers in the town centre.
- A suggestion was offered that the free parking scheme be removed entirely, and the money spent on this be used to encourage people into the town centres in other ways, such as wayfaring, promoting, showcasing businesses and holding events. It was stated that during a survey in 2021, when asked what was off-putting about visiting the town centre, although parking was not a direct question, only one person commented that parking was a barrier to them. More people said the quality of shops, attractiveness of the town centre, and things to do were a barrier for them. Others agreed that more needed to be done to get people into the town centre, including events, which was something the Town Councils would look at, however they felt the free parking scheme was necessary.
- Another suggestion was to look at offering 2 hours car parking for £1 across all town centre car parks.
- As the nature of businesses in the town centres had changed and many now offered services instead of retail, it was suggested that the Working Party look at whether 2 hours free parking was enough, or whether this should be increased to 3 hours. The Group Head of Technical Services explained that if the duration of free parking was extended to 3 hours, this would mean less income was generated, further reducing capacity to support other initiatives that support town centres.
- Littlehampton Town Centre and Bognor Regis Town Centre were very different, and it may be that the scheme should look different in each of these.

- It was asked whether the ticket machines could issue 2 hours free parking, and whether other similar ideas could be looked into or whether the Working Party could only look at the disc scheme. The Group Head of Technical Services explained the role of the Working Party was to review the town centre free parking schemes, however it may be that their final recommendation was, for example, not to continue with this and look at the Council providing contributions to other initiatives to increase footfall into the town centres. At present there was no way of knowing how often people were using the cardboard discs, and therefore the amount of savings that would be made by discontinuing the scheme. A wholly app-based 2 hour free parking permit scheme would identify how much foregone parking revenue the scheme caused, and the importance of data to enable the Council to make informed decisions was stressed.
- It was thought some people found the parking discs to be very cheap, while others refused to purchase them as found them too expensive.
- It was thought some people had bought virtual discs, but found them too difficult to use, so had also bought cardboard discs.
- It was suggested that town centre car parks could be made much cheaper than seafront car parks, which would encourage visitors to park in the town centres, and hopefully use the businesses.
- Events like Armed Forces Day and fireworks were great, but they should be moved more towards the town centres to encourage people to use town centre businesses.
- It was felt that better signage could be used to signpost visitors to the town centres.

The Group Head of Technical Services asked that ideas or suggestions gathered by the Working Party be sent to Officers in advance of the next meeting. The Chair emphasised that the Working Party should carry out work on this, and it should not just be completed by Officers.

#### 8. DATE OF NEXT MEETING

It was noted that the next meeting of the Free Parking Scheme Review Working Party would take on place on Monday 13 May 2024 at 6.00pm.

(The meeting concluded at 7.44 pm)

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<b>Environment Committee</b>	<b><u>Report Author</u></b>	<b><u>Date of Meeting</u></b>	<b><u>Time</u></b>	<b><u>Full Council Meeting Date</u></b>
Bathing Water Quality	Neil Williamson	<b>15 June</b>	6 pm	19 July
Public Space Protection Order for Dogs	Neil Williamson			
Play Area improvements 2023/24	Rachel Alderson			
Q4 KPI Report				
Two-Hour Town Centre Parking Schemes	Lisa Emmens	<b>7 Sept</b>	6 pm	8 Nov
Public Space Protection Orders for Adoption	Neil Williamson			
Q1 KPI Report				
Review of Car Park Tariffs	Lisa Emmens	<b>21 Nov</b>	6 pm	10 Jan
Beach access update report	Joe Russell-Wells/Karl MacLaughlin			
Bersted Brooks Park	Joe Russell-Wells/Rachel Alderson			
Additional Licensing Scheme for Houses in Multiple Occupation – Consultation Results and Outcomes	Louise Crane			
Air Quality Strategy	Neil Williamson			
Q2 KPI Report				

<b>Environment Committee</b>	<b><u>Report Author</u></b>	<b><u>Date of Meeting</u></b>	<b><u>Time</u></b>	<b><u>Full Council Meeting Date</u></b>
Q3 KPI Report Bersted Brooks Park Quarter 3 Budget Monitoring Report Committee Revenue and Capital Budgets 2024/25 - Environment	Joe Russell-Wells/Rachel Alderson Antony Baden Antony Baden	<b>23 Jan</b>	6 pm	13 March
Combined Cleansing Services Contract – service configuration and tender scope approval Contaminated Land Strategy Bathing Water Quality Arun Flood Forum – Inaugural meeting update Update from the Free Parking Scheme Review Working Party (information update)	Oliver Handson Neil Williamson Neil Williamson Joe Russell-Wells Chair of the Working Party	<b>19 March</b>	6 pm	9 May

<b>Environment Committee</b>	<b><u>Report Author</u></b>	<b><u>Date of Meeting</u></b>	<b><u>Time</u></b>	<b><u>Full Council Meeting Date</u></b>

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