



**Glazebrook Associates Ltd
Environmental Health and Housing**

TO WHOM IT MAY CONCERN

14th December 2016

Dear Sir/Madam,

St Josephs, Bognor Regis PO21 1NJ

Proposal to convert to an HMO – compliance with Private Sector Housing requirements

Change of use of St Joseph's, Essex House (1-2 Walton Road) and Blackbird Cottage to provide accommodation for up to 90 Butlins team members (referred to as The Application site) plus a site manager

My Background & Experience

I am a chartered member of the Chartered Institute of Environmental Health Officers, having qualified with a B.Sc. (Hons) in Environmental Health in 1984. I have worked in the field of housing for the last 29 years, specialising particularly in Houses in Multiple Occupation and Statutory Nuisance/Disrepair issues.

I have spent 10 years as an enforcement officer within Local Government followed by 21 years in private practice, so have extensive experience of dealing with both the tenant and landlord perspective. I have inspected several thousand properties across a wide range of house type including small, tenanted, individually occupied dwellings to very large hotels and hostels used for Temporary Accommodation, all tenure types and most forms of dwelling construction. When required I have attended the relevant courts to act as an expert witness and have acted as both expert and advocate in the First Tier Tribunal on matter relating to HMO appeals.

In my position as Treasurer and member of the Steering Group of the National Houses in Multiple Occupation (HMO) Network, I am consulted by Department for Communities and Local Government (CLG) on relevant housing issues and I contribute regularly to consultation document responses. I am also a Warwick University accredited trainer for HHSRS and the Housing Act 2004 in general including Part 2 relating to HMO licensing and an accredited verifier for Unipol for large student accommodation.

I have run many in-house and open access courses on all aspects of Housing enforcement covering both social and private landlords and tenant groups.

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Involvement with this project

I am regularly engaged by landlords (from both the public and private sector) to advise on the suitability of property for use as HMOs. 120 Aldwick Road Ltd first engaged me to advise on a previous property (Ashley House) which is part of the same Butlins project in October 2015 and for this development in July 2016 at which time I was asked to provide a general overview with regard to any potential HMO issues arising from the plans as they were at that stage and to clarify exactly what would be required in order to ensure that the new building would comply fully with Arun District Council's standards and the requirements of the Housing Act 2004.

I have continued to be involved with providing advice to-date, ensuring that the accommodation meets or exceeds the standards required of HMOs within Arun; in addition I have worked with the other experts involved to provide a holistic approach to make the design work internally.

HMO Standards

The Housing Act 2004 (The Act) provides definitions to describe Houses in Multiple Occupation (HMOs) allows for the licensing of certain HMOs and prescribes standards relating to facilities within them which must be complied with. The Act stands apart from Planning legislation definitions and classifications for HMOs.

An HMO is defined for the purposes of The Act as being a building or part of a building that meets one of three "standard tests" or falls into the category of a building converted into self-contained flats without meeting the standards of the 1991 Building Regulations. In order to be an HMO the building must be occupied by more than one household as their main residence (or as a student residence) and they must share a basic amenity (unless it is a building converted into flats).

Section 65 (2) of The Act states that a local authority may decide that a house is not reasonably suitable for occupation by a particular maximum number of households or persons *even if it does meet* the "prescribed" standards for occupation. The relevant prescribed standards are set out in Schedule 3 of the Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006. They deal respectively with heating, washing facilities, kitchens, units of living accommodation without shared basic amenities and fire precautions. These prescribed standards contain NO requirement that any area or facility should be a particular size. Dimensions are entirely absent and requirements are qualitative, i.e. using words such as "adequate", "appropriate" and "reasonably practicable". Local Authorities, and Arun is no exception, therefore produce their own minimum standards above and beyond those legally prescribed specifying, in particular, suitable room space standards. It should be noted however that while it is acceptable for local Authorities to aspire to such standards, the legislation does not allow for them to set legal minimum space standards which have the same weight as the prescribed standards.

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Consultation with Arun DCs Private Sector Housing & Public Health Team

Arun District Council's HMO standards have recently been reviewed to be more in line with all of the other authorities in Sussex. Having consulted with the Private Sector Housing (PSH) team on a previous property being utilised for the same purpose as this application (namely Ashley House LPA ref: BR/100/16/PI) which has since been granted planning permission) I am satisfied that I have a full understanding of the local requirements and that the PSH team will have no objections to the proposals for this Application site.

I am confident that the proposed plans will meet and even exceed Arun's standards to successfully achieve an HMO licence(s), where appropriate, with no additional requirements. As a major refurbishment project any possible Housing Health & Safety Rating Standard (HHSRS) concerns under Part 1 of the Act will also be fully met. I have cross-referenced the proposals with Arun's HMO standards and can also confirm that the plans, as submitted, meet all the requirements of the prescribed standards are set out in Schedule 3 of the Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006, mentioned above.

Current Position & Plans

The Application site is currently empty, having previously been used as a residential care home and/or accommodation for the religious sisters who ran the home. The intention is to convert the buildings included on the Application site into quality, well-managed HMOs which will be leased to Butlins on a long term basis for use by its staff. Appropriate funding has been allocated for the improvement works to ensure the properties will meet all relevant standards and provide superior accommodation for a maximum of 90 staff in 53 rooms (plus a self-contained manager's unit resulting in a total of 91 people). Given that the application site is only 600m from the Butlins site, staff will be able to walk to work, although bus transportation will also be available as buses will stop here on the way to the Butlins site from Ashley House, another accommodation site in the town on Aldwick Road as mentioned above.

While leased to Butlins, the properties will be occupied only by its staff. As with all staff accommodation provided by Butlins throughout the country, it will be occupied on a licence basis tied to having a job with the Company. In keeping with the current on-site accommodation in Bognor, most, although not all of the rooms will be occupied on a twin basis with friends and colleagues of the same sex sharing rooms, some of which will be ensuite. There are also a number of single rooms plus a few double rooms for couples. Due to the shape of the application buildings there are also proposals for a few self-contained rooms plus separate on-site manager's accommodation. Rooms are all a reasonable size, several being well in excess of 15m². In addition there are a number of living rooms spread throughout various floors in all three buildings to provide staff with amenity/leisure space away from their bedrooms including a large Conservatory. This will however only be open to the staff between the hours of 8am and 7pm to avoid any

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potential problems for both residents and neighbours with noise. Staff also have amenity/leisure space on the Butlins site itself ensuring there are several options available. In addition there is a specific bulky item storage room where staff can safely store things like suitcases and to which access will be available only via the manager for security reasons.

Butlins, as a company, relies heavily on a team dynamic to operate successfully and staff form close bonds within the team(s) in which they work. The intention is to ensure that anyone allocated a shared room will already know their room sharing partner and have the option to veto an allocation should there be any disharmony between individuals. The Company has no desire to foster poor relations and already has vast experience in managing exactly this type of shared accommodation on all its sites including in Bognor. The Company is keen, not only to avoid disputes in the allocation process, but also to minimise any disputes which may arise after living arrangements have been tested, and therefore have a clear policy in place to handle these should they occur. At no time would two individuals who do not get on be expected to share a room, in exactly the same way as the on-site accommodation is currently managed.

While all meals are provided for all staff on site, kitchen/diners, kitchens and even some kitchen/dining/living rooms are included in the planned accommodation purely to allow staff to cater for themselves if they so desire. Butlins' experience is that staff members generally prefer to partake of the meal provision service and only occasionally cater for themselves. However, in St. Joseph's there are 8 kitchens servicing 47 people (a ratio of less than 1:6) with an additional 2 twin rooms having their own kitchens making 51 people in St. Josephs in total; in Essex House there are 4 kitchens servicing 19 people (a ratio of less than 1:5) and in Blackbird Cottage there are 3 kitchens servicing 20 people (a ratio of just over 1:6). Given that all meals are already provided on-site, this provision is considered very generous and meets Arun's standards in any case. In relation to shared bathroom facilities the ratios are 1:3 in St. Joseph's House, 1:2.5 in Essex House and 1:3 in Blackbird Cottage all of which exceed the 1:4 requirement to meet Arun's standards.

As already mentioned, there will be a permanent on-site caretaker/manager living in his/her own self-contained accommodation whose responsibilities will include the enforcement of house rules to which all staff would sign. The on-site caretaker would, in my opinion, considerably reduce any worries about anti-social behaviour.

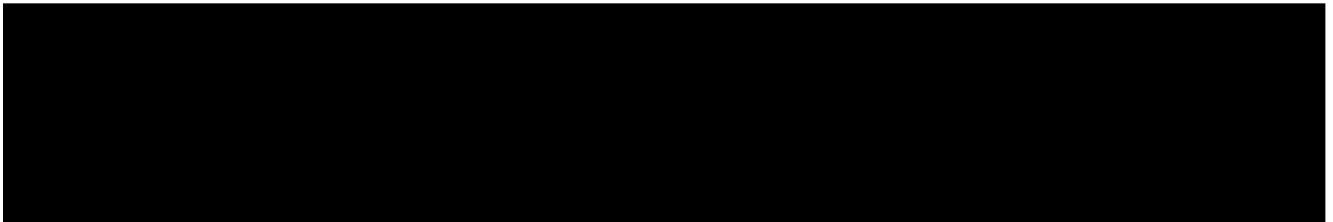
As mentioned above, staff will be able to walk to work at the Butlins site which is only 600m (a third of a mile) distant from the Application site although there will also be a shuttle bus service. There will also be provision for safe bike storage both here and on the Butlins site should bike travel be preferred. Twenty cycle parking spaces will be provided here. Staff will not be allowed to have cars on this site. Again this plan ensures minimum disturbance (if any at all) to neighbours.

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Conclusions

I am satisfied that, after the research, comments on the initial proposals, amendments and investigations and particularly the reference to Arun DCs HMO standards, that the completed properties will be fully compliant with the requirements of the Housing Act 2004 and, where necessary, will obtain a licence under the Mandatory HMO licensing scheme.

Yours faithfully,



Mrs. Michele Glazebrook BSc (Hons) MCIEH CEnvH
Chartered Environmental Health Practitioner
Director Glazebrook Associates Ltd

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