

Subject: SELECTIVE LICENSING PROGRESS REPORT

Report to: Corporate Project Board – 4th June, 2018; Housing and Neighbourhoods Committee – 14th June, 2018

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SUBJECT MATTER/RECOMMENDATIONS

This report seeks to update Members on the proposal and consultation for a Selective Licensing Scheme. In particular, it presents an update against the original business case, including the potential use of a Service Delivery Partner. The Committee is recommended to:

1. Approve the 'Consultation on Selective Licensing in the Nelson Ward' document and to commence the consultation process which will run from 15th June 2018 – 24th August 2018.
2. To note the proposed use of Community Connectors in the Selective Licensing area to further strengthen the outcomes of this project.
3. To note that Full Council will receive a 'Selective Licensing Recommendation Report', on the 13th of September, following the 10 week stakeholder consultation.

1. BACKGROUND

- 1.1 The Committee Report 'Private Rented Housing; Proposal for a Selective Licensing Scheme within Nelson / Central and Northgate Wards', went to Full Council on the 2nd of November 2017.
- 1.2 Full Council agreed that Officers would further develop a scheme of Selective Licensing covering a geographic area comprising parts of the Nelson and Central and Northgate wards.
- 1.3 The release of £38,788 from the Special Project reserve to fund the development of the scheme, which included the appointment of a Housing Licensing Manager alongside undertaking statutory consultation for the scheme prior to finalising the details of scheme was also agreed.
- 1.4 The Selective Licensing Scheme aims to tackle significant and persistent levels of

Anti-Social Behaviour (ASB), crime, poor housing conditions, low housing demand, and high deprivation, related to the private rented housing sector within these areas.

2. CONSULTATION PROCESS OVERVIEW

- 2.1 Before introducing selective licensing to an area, the Council must conduct a full consultation with all affected people, such as tenants, residents, landlords, managing agents, businesses etc. The consultation should be widely publicised using various channels of communication.
- 2.2 If the designation does not require the confirmation of the Secretary of State because of its extent the local housing authority must consult on the proposed scheme for at least 10 weeks.
- 2.3 Once the consultation has been completed the results should then be published and made available to the local community. This should be in the form of a summary of the responses received and should demonstrate how these have either been acted on or not, giving reasons.
- 2.4 It is proposed that a ten-week public consultation will run from the 15th June 2018 – 24th August 2018. During the week following the end of the consultation, Officers will report upon the consultation responses.
- 2.5 A Recommendation Report would then be submitted to Full Council on the 13th of September 2018 for Member consideration and decision. If a Selective Licensing Designation Proposal is made, and Full Council decides to designate this area for the purposes of Selective Licensing, the Designation Notice would be published on the 14th of September. The designation would become operative on the 14th of December 2018 and be recommended to last for a period of five years until the 13th of December 2023. Please note that these timescales may be subject to change in the event of unforeseen circumstances.

3. INTRODUCTION

- 3.1 The Project Manager/Senior Housing Licensing Officer was seconded into the post on the 31st of January, following interview on the 18th of December. Due to the date of appointment, there has been a significant compression of the timeline, so that a Selective Licensing Area could still be designated during Full Council on the 13th of September, should Members desire it.
- 3.2 Since this appointment a number of things have been done to investigate Selective Licensing, develop the scheme, and gather an evidence base: Landlords

Associations have been engaged, peer Local Authorities have been interviewed and visited, and a data and intelligence consultant appointed. This has enabled the development of the formally required consultation document, which has included a fees and charges review. See Appendix 1 for a copy of this consultation document.

4. DATA AND EVIDENCE GATHERING

- 4.1 Our data and intelligence consultants have collated, and processed the data gathered by the Council and its partners, to create the evidence base to justify Selective Licensing, and rebuff any consultation or legal challenges. The evidence base for Selective Licensing regarding the Central and Northgate Ward and the Nelson Ward demonstrates that the three most challenged areas are within the Nelson Ward. These are proposed for designation within the consultation document (Appendix 1).
- 4.2 For Great Yarmouth, there is clear evidence to make a Selective Licensing Designation for five out of six of the criteria within the two Wards – more than most Designations – though evidencing one criteria would be enough. The exception is migration, as this is for mass migration events.
- 4.3 However, the Private Rented Sector has grown so much between 2011 and 2017, that the extent of the designation needs to be restricted to the three most challenged (and majority privately rented) LSOA areas within the Nelson Ward.
- 4.4 The proposed area covers the most densely populated northern part of Nelson Ward (see Chapter 2.1 of the Consultation Document), except the Middlegate Council Housing area. It also excludes the Dickens Council Housing Estate, and unpopulated South Denes. Such a restricted designation would result in fewer objections from landlords, particularly the Eastern Landlords Association, who identified that they had significant property holdings in Central and Northgate Ward.
- 4.5 A designation within the Nelson Ward would be in line with the initial discussions for Selective Licensing, and is the outcome of the agreed investigation into parts of the two wards. The area proposed for designation is just 0.57% of the Borough area, so well under the 20% threshold where approval would be required from the Secretary of State.
- 4.6 Likewise, this area includes approximately 1,630 privately rented homes, or 18.21% of the Borough total, and is therefore below the 20% threshold for the Secretary of State's approval. It is worth noting that if consent from the Secretary of State is required, it could delay the decision by up to a year, and would almost certainly result in a refusal of the designation.

- 4.7 Should the Council desire a larger Designation in the future, covering parts of Central and Northgate Ward, this could be achieved by a subsequent consultation and designation. Other Local Authorities have done this to get consent from the Secretary of State.

5. STAKEHOLDER ENGAGEMENT

- 5.1 As part of this process it is very important to engage with landlords associations, to explain plans, and get them on-board with Selective Licensing proposals, as there have been cases where proposals have been challenged, and designations Judicially Reviewed; leading to delays and failures, as with Hyndburn Borough Council.
- 5.2 So very early on, outline proposals were discussed firstly with the Eastern Landlords Association (ELA), and then the National Landlords Association (NLA), through meetings and landlord forums. Despite best efforts, ELA landlords advised that they are likely to oppose any regulation, while the NLA were very constructive, prepared to listen, and offered advice.
- 5.3 Equally, the approaches, successes, failures, and lessons learned by other Councils have been investigated with the National Landlords Association (NLA), through emails, telephone interviews, and also exploratory visits to Selective Licensing peer authorities; these were the seaside resorts of Hastings Borough Council, and Margate (Thanet District Council).
- 5.4 Investigations indicate that most Local Authorities had set the licence fee much too low, and so these Local Authorities have suffered significant financial losses: for example, Peterborough Borough Council have had to increase discounted fees from £50 to £900; Hastings Borough Council made Selective Licensing staff redundant; Thanet District Council only avoided very significant losses through a £500,000 grant from Kent County Council; Thanet and all other authorities have increased fees mid-scheme, or when renewed for another 5 years.
- 5.5 It is worth noting that the licence fee structure in the previous Committee Report was based upon Thanet District Council's in an attempt to keep costs down. However, we were not told that this was not financially sustainable, until later visiting the Council.
- 5.6 A typical sustainable average up-front licence fee is in the region of £650.
- 5.7 The NLA recommended that the Council investigated how Doncaster Metropolitan Borough Council, and West Lindsey District Council have worked with a Delivery

Partner in Selective Licensing: landlords prefer, as independent inspectors visit their property, rather than the Council, because to the considerable landlord benefits, and the low monthly membership fee helps to budget for the costs. We have been very impressed with this approach, and given that we proposing to consult upon using a Delivery Partner,

- 5.8 NLA are being very supportive of our approach – including being broadly supportive of our proposed fee structure – agreeing to undertake media interviews about our Selective Licensing Consultation, and to host a landlords Consultation meeting. Ultimately, they support our aim to improve housing and social conditions for residents, and to create a level playing field for the ethical landlords, by discouraging unethical landlords. This is encouraging and should help to mitigate the risk of legal challenges to the Council.

6. REVISED BUISNESS CASE CHANGES

- 6.1 A number of changes have been made to the original business case issued to Members on 2nd of November 2017. This is as a result of the further development work that has been undertaken on this project, as detailed in the report sections above.

DELIVERY PARTNER OPPORTUNITY

- 6.2 Firstly a delivery partner option has been built into the business case. This option was developed since the report to Full Council, following the advice of the NLA, and feedback other Local Authorities. This option means that The Council would enter into an agreement with a Delivery Partner who would handle online landlord licence applications, collect the application fee, inspect the properties, and deal with complaints about the properties or tenants, under a 'landlord support service' that landlords would join. The Council would still issue the licences, and be the regulator.
- 6.3 The Council would not pay directly for this service, as it is funded out of the landlord's modest £9.50 monthly membership fees, or within the up-front total fees depending on which way the landlord wishes to pay for their licence. As a result, the contract to supply this service is being offered as a concession (through the Consultation Document) for any interested company to apply for as part of the procurement process for such a company. Companies providing this service reinvest their profits within the scheme areas (see 6.6), and so seek to only make limited profits.
- 6.4 With a Delivery Partner undertaking so much of the work on behalf of the Council, The Council's staff time and costs are greatly reduced as there is no requirement to

recruit inspectors, as the Delivery Partner employs them. Therefore, there is only a small licence application fee, which is required to cover the Council's administration costs.

6.5 Benefits of such Delivery Partner Schemes include:

- Free training to landlord members;
- Quarterly landlord forums;
- Discounted mortgage rates from Lloyds Bank;
- Discounted landlord insurance from Lloyds Bank;
- Mediation between landlord and tenant, and between tenants;
- B&Q Trade Point Card with 30% discount on everything;
- Numerous languages available for online application forms;
- Accredited local tradesmen and businesses (good service for landlords, and boosts local businesses);
- Credit & reference checks;

In future, these benefits will expand to include:

- Rent collection for landlords via direct debit (thus solving the Universal Credit issue);
- A tenancy outcome database (it will include data from scheme members and their tenants, thus dealing with the problem of good references for poor tenants, and enabling tenants to identify poor landlords);
- A property marketing portal (a full available stock list of safe rented homes – thus saving on agency fees for landlords);
- New landlords-only insurance products.

6.6 In addition to the aforementioned benefits to the Council, landlords, and tenants, Delivery Partners typically also undertake and promote social investment; for example, construction students repairing boundary walls (to reduce crime) using donated materials, and youths are encouraged to litter pick in exchange for vouchers for free access sporting facilities. Significantly, the above B&Q discount led to £250k of landlord savings in the Doncaster B&Q within just 6 months. Such benefits have meant that ineligible landlords have clamoured to pay to join these schemes.

FEES & CHARGES REVIEW

6.7 The Selective Licensing Fees and Charges that were contained within the previous Committee Report and Business Case were indicative costs, subject to investigation.

6.8 As discussed earlier in this report, upon further investigation through interviewing and visiting other Local Authorities, it was found that the original indicative fees would not cover the cost of the scheme, as the proposed fees would. Therefore, if

the proposed licence fees were reduced, it would effectively mean that the Council is subsidising the licence fees from revenues, rather than the Selective Licence Scheme being self-funding.

- 6.9 The full table of Fees and Charges are contained within the Appendix 1 Consultation Document (see Appendix B of the document). The fees include the 20% VAT that a Delivery Partner would need to pay.

COMMUNITY CONNECTORS OPPORTUNITY

- 6.10 Investigations indicate that all LAs delivering a Selective Licensing Scheme have had to extend it after the initial five years as the original objectives were not met. This even includes the London Borough of Newham, which has the most prosecutions in the country, but only inspected a fraction of licensed properties. It seems most probable that this is because the level, or nature of the resources employed, were insufficient for entrenched issues such as multiple deprivations.
- 6.11 We propose to tackle these deprivation issues by building on the work of the Neighbourhoods That Work Programme by using the current Community Connectors model to redirect some of this resource into visiting licensed properties with the Housing Inspectors (or afterwards following reports), and speak to the residents to identify their needs and the issues facing them, before championing them with other agencies. This may include reporting crime and ASB, or enabling access to healthcare, child support, and training, with the outcomes of increasing their household income, or lead more healthy and active lives. Ultimately the aim is to achieve raising these areas out of the most deprived in the Country.
- 6.12 It would be proposed to redirect some Community Connector resource into this project area for an initial two year period, so that their performance and impact upon deprivations can be measured against KPIs with respect to new data. If an appreciable positive impact can be measured, then this work could then be extended for the full five years of the project.

7. COMMUNICATIONS PLAN

- 7.1 Media and Landlords' Associations engagement regarding the consultation began on the 6th of June, with the publication of the Committee Papers.
- 7.2 Stakeholder Engagement is planned through a NLA Selective Licensing Meeting at the Town Hall, on the 18th of June, and all-day Stakeholder Drop-In sessions on the 18th and 25th of June. Social Media, leaflet and poster materials are also prepared.

- 7.3 The full Communications Plan, with key dates is contained within the 'Consultation on Selective Licensing in the Nelson Ward' document, Appendix 1

8. FINANCIAL IMPLICATIONS

- 8.1 The £38,788 from the Invest to Save Reserve has been essential in investigating and evidencing a financially sustainable Selective Licensing Scheme. The time this afforded has also enabled total project savings of over £27k from the original Business Case, to be found from Software Licensing, and Intelligence and Data costs as the project moves forwards.
- 8.2 With the revised fees and charges and the use of the delivery partner the financial risk of this project have been significantly reduced.

9. RISK IMPLICATIONS

- 9.1 The risk register for this project is updated regularly. Indeed, most of the key risks have been mitigated or controlled with the work so far and present proposals.
- 9.2 A key risk is that the Council could have a legal challenge to a Selective Licensing Designation. However, this is mitigated by the ongoing engagement with landlords, the Consultation evidence base and document, the detailed Communications Plan, and the greater appeal of a Landlord Support Scheme.
- 9.3 The current proposals should mitigate the risk of the Selective Licensing Scheme not being self-funding, as is the Government's intention. However, should the fees be reduced, there is the risk that either the scheme will have to be subsidised by Council Tax payers, and business rates, or the resources would need to be cut, and the Selective Licensing objectives may not be met.

10. CONCLUSIONS

- 10.1 The project is progressing in accordance with the timeline, to go to consultation, allow designation – should Full Council decide this – and commencement of the Selective Licensing Scheme by September and December 2018 respectively, as outlined within the original report to Full Council.
- 10.2 Higher licensing fees are proposed than within the original Committee Report and Business Case. However, these should ensure that the scheme is sustainable properly resourced, and self-funding.
- 10.3 Working with Delivery Support Partner reduces financial and legal challenge risks,

gives benefits to landlords, increases affordability to landlords, and provides the most likely chance of achieving the objectives of Selective Licensing within the 5 year scheme duration.

- 10.4 There is also an opportunity to include Community Connectors within the fees structure, or Invest to Save Budget to work with people to tackle the multiple deprivations affecting their lives and communities.

11. RECOMMENDATIONS

11.1 This Committee is recommended to:

- Approve the 'Consultation on Selective Licensing in the Nelson Ward' document and to commence the consultation process which will run from 15th June 2018 – 24th August 2018.
- To note the proposed use of Community Connectors in the Selective Licensing area to further strengthen the outcomes of this project.
- To note that Full Council will receive a 'Selective Licensing Recommendation Report', on the 13th of September, following the 10 week stakeholder consultation.

Areas of consideration: e.g. does this report raise any of the following issues and if so how have these been considered/mitigated against?

Area for consideration	Comment
Monitoring Officer Consultation:	The Monitoring Officer has been consulted.
Section 151 Officer Consultation:	The Section 151 Officer has been consulted.
Existing Council Policies:	The Housing Strategy has been considered.
Financial Implications:	Yes. Details contained within the report.
Legal Implications (including human rights):	The Monitoring Officer has been consulted
Risk Implications:	Yes. Risk Register maintained for project.
Equality Issues/EQIA assessment:	Considered during stakeholder engagement
Crime & Disorder:	No
Every Child Matters:	No

APPENDIX 1 – Consultation Document



GREAT YARMOUTH
BOROUGH COUNCIL

Consultation on Selective Licensing in the Nelson Ward

Proposal to make a selective licensing designation

Stakeholder Consultation
15th June 2018 – 24th August 2018

Executive Summary

This Stakeholder Consultation document is to inform and consult with all interested parties about Great Yarmouth Borough Council's proposals with regards to introducing a Selective Licensing Scheme.

What is proposed?

Great Yarmouth Borough Council is proposing to designate certain parts of the Nelson electoral ward, as a selective licensing area under section 80 of the Housing Act 2004. It is proposed that the designation would begin on 14th of December 2018 and last for five years.

It is further proposed that a Delivery Partner will be used within the Selective Licensing Scheme.

What is a selective licensing designation?

Local housing authorities, such as Great Yarmouth Borough Council, have the discretionary power to designate an area for the purposes of selective licensing if certain legal tests are met. Once an area has been designated, all privately rented homes within the area must be licensed with the council (unless subject to statutory exemption). A selective licensing scheme requires private landlords to comply with a range of licence conditions to ensure good property management. Selective licensing does not apply to owner-occupied or housing association homes.

Why is the council proposing to do this?

The area in question suffers from a wide range of entrenched problems that arose out of many years of socio-economic change; a situation that is not uncommon in other coastal communities. As one of the most deprived areas in England, it suffers from high levels of crime and anti-social behaviour, low housing demand, multiple deprivations, and poor housing conditions. Selective licensing can provide additional powers to help the council tackle poorly managed privately rented property. As approximately 60% of the accommodation in the area is in the private rented sector (national average 20%), improved management standards in this sector should contribute to an overall improvement in living conditions in the area. This should lead to a better quality of life for residents in all tenures.

How can I have my say?

The council wants your views and comments on this proposal. A ten-week public consultation will run from the 15th June 2018 – 24th August 2018. Go online at www.great-

Great Yarmouth Borough Council

yarmouth.gov.uk/have-your-say to respond to the consultation. Alternatively, you can collect and submit a paper version of the consultation document at the following locations:

- Great Yarmouth Borough Council, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF
- Comeunity, 135 King Street, Great Yarmouth, NR30 2PQ
- GYROS, The Books & Beans Cafe in The Central Library, Tolhouse Street, Great Yarmouth, NR30 2SH

A final decision as to whether to make a selective licensing designation, or not, will only be made at Full Council, after the council has carefully considered all the responses received during the consultation.

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Table of Contents

Executive Summary	i
What is proposed?.....	i
What is a selective licensing designation?	i
Why is the council proposing to do this?	i
How can I have my say?.....	i
1 Introduction	5
1.1 Background.....	5
1.2 Document structure.....	5
2 Proposal for public consultation	7
2.1 Proposed designated area.....	7
2.2 Why this area? A brief historical context.....	8
2.3 General approval by Secretary of State.....	10
2.4 Legal tests.....	10
2.5 Proposed timescales.....	11
2.6 Proposed Licensing Scheme	11
2.7 Proposed licence fee structure	16
2.8 Licence conditions	18
2.9 Housing strategy	19
2.10 Existing Housing Initiatives	20
2.11 Expected benefits of a designation	21
2.12 Alternatives to selective licensing	21
3 Supporting evidence.....	24
3.1 Overview	24
3.2 Housing stock overview	24
3.3 Low housing demand.....	26
3.4 Anti-social behaviour.....	27
3.5 Housing conditions.....	28
3.6 Migration	30
3.7 Deprivation.....	31
3.8 Crime	33
3.9 Overall ranking.....	33
4 How to make comments on this proposal	35
4.1 How to make representations	35
4.2 Consultation methods	35
Appendix A: Maps of proposed designated area	38

Police ASB Map.....	38
Police CAD Map	39
ASB complaints 3/2014 - 9/2016 by Ward.....	40
Housing complaints 3/2014 – 9/2016 by Ward	41
Appendix B: Selective Licensing fees and charges	42
Appendix C: Evidence Base	45
Appendix D: Maps of proposed designated area	59
Proposed Designated Area Map.....	61
Proposed Designated Sub-Area (LSOA 006B) Map.....	62
Proposed Designated Sub-Area (LSOA 006C) Map	63
Proposed Designated Sub-Area (LSOA 006E) Map.....	64
Appendix E: Roads Affected by the Proposed Designation	65
Appendix F: Selective Licensing Landlord Support Service Delivery Partner	67

1 Introduction

1.1 Background

Great Yarmouth Borough Council (the council) is the local housing authority for the Borough of Great Yarmouth, is situated on the coast, in the south east corner of Norfolk. A mixed urban/rural area, the population of approximately 98,000 is concentrated in the urban centres of Great Yarmouth, Gorleston, Bradwell and Caister-on-Sea, with smaller communities in Hopton-on-Sea, Hemsby, Martham, Ormesby and Winterton on-Sea.

Great Yarmouth is situated on the coast of Norfolk in East Anglia, and includes 15 miles of coastline and is a substantial part of the Broads National Park. The area served by the Council covers 67.2 miles² (174 km²) and includes the towns of Great Yarmouth and Gorleston-on-Sea and a rural hinterland consisting of 21 parishes stretching from Winterton in the north to Hopton in the south. It is about 20 miles east of Norwich.

Local housing authorities are empowered under Part 3 of the Housing Act 2004 to introduce selective licensing schemes in all or parts of their area. Once a scheme has been introduced, all privately rented accommodation situated within the designated area must be licensed, unless subject to statutory exemption. Prior to April 2015, an area could only be designated if it was, or was likely to become, an area of low housing demand and/or it had a significant and persistent problem with anti-social behaviour where the inaction of private landlords was a contributory factor.

A selective licensing designation cannot be made for a period longer than five years.

1.2 Document structure

Chapter 1 briefly introduces the Borough, Selective Licensing, and the document.

Chapter 2 sets out the Council's proposal for a designation, and the key elements of the proposal which is the subject of this public consultation. The chapter also explains how this position was reached, through identifying and investigating the Wards of concern for the Council, before narrowing down to the proposed Selective Licensing Designation Area.

Before making a proposal to designate a selective licensing area, the council must first be satisfied that at least one of the legal tests (or conditions) has been met. Chapter 3 identifies the six criteria for designation and deals with each in turn.

Selective Licensing must be part of a coordinated response to problem areas. Chapter 4 highlights the complementary initiatives currently in place to support regeneration.

Chapter 5 provides information on how to make a response to this public consultation.

It also lists the ways in which the consultation is being widely publicised.

Appendices includes, all of the detailed evidence within maps and tables, that support the Selective Licensing proposals

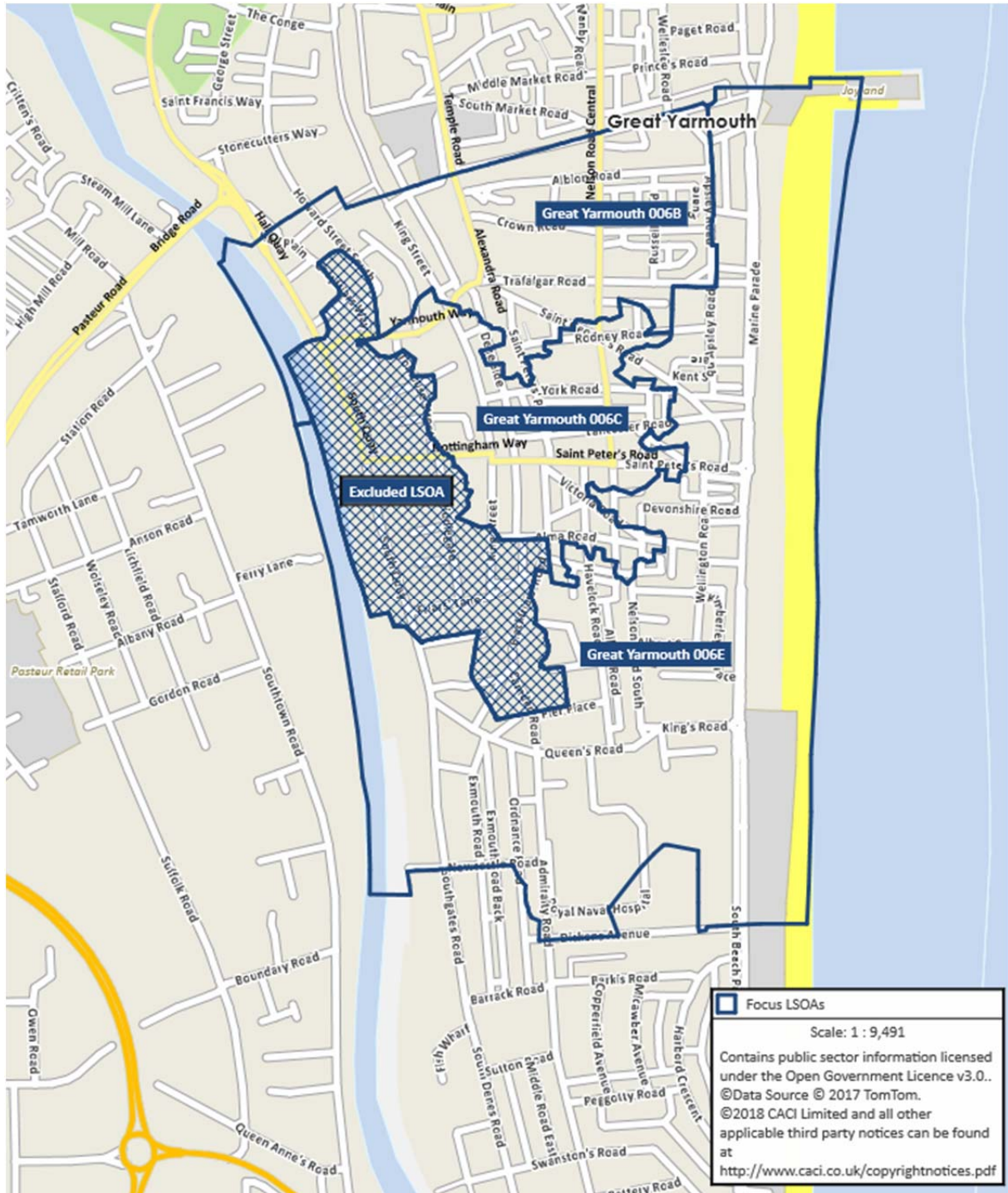
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2 Proposal for public consultation

2.1 Proposed designated area

A map showing the proposed selective licensing designation is shown below. It includes all of the blue outlined area, excluding the cross-hatched area.

Figure 1: Map of proposed designated area (2018-23)



2.2 Why this area? A brief historical context

This consultation document sets out a proposal for the Council to implement a Selective Licensing scheme in relation to a geographic area comprising parts of the Nelson Ward of the Borough of Great Yarmouth, based on evidence from an investigation of the Nelson and Central and Northgate Wards, in accordance with the provisions of the Housing Act 2004. The scheme aims to tackle significant and persistent levels of Anti-Social Behaviour (ASB), crime, poor housing conditions, and deprivation, related to the private rented housing sector.

Bounded by the seafront to the East and South, Regent Road to the North, and South Quay to the west, Nelson Ward in the centre of Great Yarmouth consists mainly of high density residential areas typically built during the Victorian era.

The Central and Northgate Ward is bounded by Salisbury Road to the North, the Broads to the West, the sea to the East and Regent Road/Street to the South, forming a boundary with Nelson Ward.

The first hotel to service the burgeoning holiday trade in Great Yarmouth, was built in 1759, when visitors came to the seaside to bathe in the salt sea water, believed to have healing powers. The area fast became a seaside resort, propelled forward by the building of three railway stations. Numerous attractions, two piers, and theatres to entertain the tourists, were built along the seafront, many of which remain to this day. Whilst Great Yarmouth still has a successful tourism industry, the demand for holiday accommodation has decreased along with the decline of the traditional English seaside holiday in recent decades, having a profound impact on the area.

Nelson, and Central and Northgate Wards, were once the heartland of small hotels and guest houses. However, the nature of the area has changed as holiday styles have changed, leaving owners of large properties with little financial alternative but to open their rooms up to residents who need living accommodation. Hence the growth in the number of houses in multiple occupation (HMO), bedsits, and small flats (in pursuit of the maximum number of rental units) within the ward. Many of these HMOs are run by irresponsible landlords exploiting the plight of their tenants, some of whom are the most vulnerable in society. Also, as more hotel and guesthouse businesses have closed and owner-occupiers moved out, more private landlords moved in. The private rented sector became the dominant tenure in parts of these Wards, with some landlords owning large portfolios.

Piecemeal interventions by a number of agencies over the years have secured improvements to some of the housing on a generally reactive basis, although it is recognized that attempts at wider area schemes such as the SHARP project (see Chapter 4) have delivered localised improvements to the housing stock.

Coupled with a rise in the number of complaints to agencies such as the police about low level crime and anti-social behaviour, the area has become one of low housing demand where only a significant investment in resources on an area wide basis can secure improvements for residents. As a result, the accommodation offer has largely been aimed at the lower end of the market. With many vulnerable households migrating inwards, the socio-economic shift has led to the area having some of the most deprived neighbourhoods in the country. The area is now characterised by high levels of worklessness, benefit dependency, crime and anti-social behaviour, poor educational achievement (Great Yarmouth has the worst post-16 educational attainment in the Country), and health inequalities.

According to the ONS Indices of Deprivation 2015, the Nelson and Central and Northgate wards are amongst the most 10% deprived wards in the Country with parts of the Nelson Ward ranking 20th out of 32, 844 neighbourhoods in England for multiple deprivations.

Preliminary investigations based upon increased political and police interest in Houses in Multiple Occupation (HMOs), led to an investigation into ASB around HMOs. Though there was no correlation between Mandatory Licensed HMOs and complaints received by the Council, or Police. However, analysis of the data, showed that the majority of Police ASB incidents (see Figure 2), and Police CADs (see Figure 3), ASB complaints to the Police and Council (see Figure 4), and housing complaints to Environmental Health (see Figure 5), demonstrated that the majority of complaints (typically more than the rest of the Borough combined), were centred around Nelson Ward and Central and Northgate Ward, with the former having a greater prevalence. This led to investigation to see if these challenges could be addressed by other forms of property licensing, and therefore Selective Licensing was identified as being the most effective way of doing this. Indeed, analysis the Police and Council data, identified that conditions within the two Wards satisfied five of the six tests for Selective Licensing (see Chapter 2.4), in addition to having the: highest density housing in Borough; greatest regulatory involvement; largest proportion of rented properties; lowest housing standards; very poor health; and very significant deprivation.

While individual private landlords cannot be held responsible for these wider changes and issues, some are perpetuating the deprivation and poor health outcomes by offering poorly managed and unsafe homes. Such landlords are not operating on a level playing field due to their poor practices, and so have been under-cutting their law-abiding competitors. Selective Licensing should make Great Yarmouth a fair place for Landlords to do business, while providing decent homes for tenants.

2.3 General approval by Secretary of State

Prior to 01 April 2010, all selective licensing designations had to be approved by the Secretary of State (SoS). Between this date and 31 March 2015 a general approval, issued by the SoS, allowed councils to designate selective licensing areas without the need for obtaining Government approval, as long as a ten week public consultation had taken place.

However, the 2010 general approval was revoked on 01 April 2015 and replaced with one that includes size restrictions on new schemes. Any new designation that is over a certain size must be approved by the SoS.

Any designation that (either by itself, or in combination with other selective licensing designations made by the council) would cover more than 20% of the geographical area of the district is excluded from the 2015 general approval. Furthermore, any designation that (either by itself, or in combination with other selective licensing designations made by the council) would affect more than 20% of privately rented homes in the district would also be excluded. Great Yarmouth Borough comprises an area of 67.2 square miles (174 square km). The area proposed for designation is just 0.57% of the surface area of the Borough, so well under the 20% threshold, and therefore the proposed designation would not require approval from the SoS owing to its relatively small geographical size.

According to the BRE (2017), there were 8,951 private rented sector properties within the Borough of Great Yarmouth, so Secretary of State's approval would be required for any scheme(s) that included more than 1,790 privately rented homes. The area proposed for designation includes approximately 1,630 privately rented homes, or 18.21% of the total private rented sector, which will include some that are exempt from Selective Licensing anyway, such as those that require a Mandatory HMO Licence for example. Therefore, Secretary of State's approval would not be required for the proposed designation.

2.4 Legal tests

Before any council can consider making a selective licensing designation it must ensure that the area in question meets certain legal tests.

Until 27 March 2015, an area could only be designated for the purposes of selective licensing if it met at least one of the two legal tests (known as conditions) set out in the Housing Act 2004. However, on this date the Government introduced four new sets of conditions. The council may now designate an area if:

- It is, or is likely to become, an area of low housing demand; or

- It has a significant and persistent problem with anti-social behaviour where the inaction of private landlords is a contributory factor; or
- Following a review of housing conditions, it is believed that the area is suffering from significant housing condition problems and the council intends to inspect the dwellings concerned; or
- It has experienced a recent influx in migration, and where the migrants are primarily occupying privately rented accommodation; or
- It suffers from a high level of deprivation which particularly affects the occupiers of privately rented accommodation; or
- It suffers from a high level of crime that affects residents and businesses in the area.

The council is of the opinion that five of the six tests are met in respect of the area proposed for designation. A designation based on migration is not proposed. The evidence to support this opinion is set out in Chapter 3.

2.5 Proposed timescales

Following the ten-week public consultation, the council will carefully review all representations made. A report will then be submitted to Full Council on the 13th of September 2018 for Member consideration and decision.

If the Full Council decides to designate the area for the purposes of selective licensing, the designation would become operative on the 14th of December 2018 and last for a period of five years until the 13th of December 2023.

These timescales may be subject to change in the event of unforeseen circumstances.

2.6 Proposed Licensing Scheme

Whilst preparing for this consultation research was conducted on schemes implemented by other Local Authorities – including visits, telephone and email communication – so that the Council could understand best practice, and what had worked well elsewhere. In conducting this research, the Council became aware of an innovative way of delivering selective licensing that was developed by Doncaster Metropolitan Borough Council in 2014. This delivery mechanism has been used in the delivery of their first two schemes, the latest designation made late last year, and also the designation currently in place at West Lindsey District Council.

In essence, the Local Authority making the designation are the Licensing and Enforcing Authority, as with any other Selective Licensing Scheme in the country, with all the powers to

enforce through the legislation allowing such designations to be made. However, once a designation is made landlords will be encouraged to join a 'Landlord Support Service' scheme, operated by a 'Delivery Partner' contractually approved by the Council, before the Council issues their licence.

This partnership approach provides a Landlord Support Service working closely with Local Authorities and the landlord community, providing support and development in areas designated for selective licensing. Non-compliant landlords will still face the prospect of prosecution but with training, support and development available, underpinned by the legislation, the prospects of improving the sector are much enhanced than through legislation alone.

The Delivery Partner, with professional knowledge of the private rented sector and landlord culture particularly, works with the Local Authority and landlord community to deliver the main objectives of licensing - raising standards and changing landlord behaviour, in a way that Local Authorities alone have traditionally found difficult to do.

Upon designation, landlords must apply for a licence and join the Landlord Support Service via the Delivery Partner's website. Great Yarmouth Borough Council is still the Licensing Authority, which issues landlords with their licence to rent out their properties legally. Landlords can either pay a much reduced licence fee and a monthly membership subscription to the Delivery Partner, or a combined reduced licence fee and lump sum membership fee for the entire term, where the overall the costs will be less (see Chapter 2.7 and Appendix B). As part of their application to join they will need to submit the certificates required for a licence. It will be confirmed to Great Yarmouth Borough Council if acceptable, whereby we will issue the licence at a discounted rate as our time taken to process is less when done this way.

All Managing Agents nominated by Landlord Support Service member landlords, to manage properties in the scheme area, will need to provide evidence of their Fit & Proper Person status and that they are members of an approved Redress Scheme.

Once a member of the Delivery Partner's 'Landlord Support Service', and in receipt of their Great Yarmouth Borough Council issued licence, any issues regarding the property, landlord or tenant are referred in the first instance to the Delivery Partner (notwithstanding the fact that Great Yarmouth Borough Council could enforce immediately if it so chooses). The delivery partner will work with the landlord to resolve the issue whilst compiling the evidence should it result in Great Yarmouth Borough Council legal action. This will take no longer than if we were to resolve and all timescales are agreed at the outset and enshrined in a contract between Great Yarmouth Borough Council and the Delivery Partner.

Membership terms and conditions are clearly laid out to Landlord Support Service's members, along with a code of practice, maintenance mandate and local charters to deal with specific problems such as ASB, waste, tenancy sustainment, etc.

The Delivery Partner offers training, a local point of contact, support and development for licence holders to compliment the more robust legislative approach taken by Great Yarmouth Borough Council. Where necessary the delivery partner will also work with Great Yarmouth Borough Council to provide the evidence required for prosecution cases. If at any time, for whatever reason, licence-holders cease to be members of the delivery partner scheme, the licence lapses (other than where they have sold the licensed property) and they must re-apply directly to Great Yarmouth Borough Council for a licence to be able to continue to legally rent out their property or properties.

The Delivery Partner will conduct an agreed number of property inspections, anticipated to be three, during the designation period, deploying trained HHSRS inspectors to inspect all scheme properties. The cost of this is covered in the monthly subscriptions with no additional costs. Inspection reports are emailed to scheme members upon completion of the inspection. Any issues raised are graded with a high, medium or low priority (consistent with HHSRS) and the membership maintenance mandate gives strict timescales to respond to these follow-up actions all of which are agreed with Great Yarmouth Borough Council.

A contract between Great Yarmouth Borough Council and the Delivery Partner will be in place from the outset with key performance indicators to ensure the scheme objectives are met, if not exceeded. The contract will be awarded as a 'Concession', rather than through procurement, as the Delivery Partner will not be paid anything by the Council. Great Yarmouth Borough Council welcomes any competent party with an interest in being the Service Delivery Partner to submit an application for the Concession. They should read Appendix F for the criteria, minimum standards, and how to apply etc. for the Selective Licensing 'Landlord Support Service Delivery Partner Concession'.

There will be a requirement for the Service Delivery Partner to periodically attend management meetings to provide updates, scrutiny and accountability. As with any contract, where there are reasonable grounds, Great Yarmouth Borough Council can terminate this contract and revert to the traditional form of selective licensing on its own.

In October 2017, The Guardian newspaper published the results of a survey made under The Freedom of Information Act with responses from over 180 Local Authorities. Doncaster Council was the 4th highest Local Authority for the number of prosecutions secured against landlords.

Also, in October 2017, West Lindsey District Council secured the highest fine ever given to a landlord through Selective Licensing. Their Service Delivery Partner had offered support in trying to obtain the landlord a licence but had to reject the application to join due to a lack of engagement.

The Council understands that where a Landlord Support Scheme has been offered, the vast majority of landlords prefer this scheme in preference to full engagement with the Council, where the Council's EHOs would undertake inspections, and formally require works by landlords, under schedules of work or notices. The option of paying a much reduced application fee, with low monthly costs (estimated to be £9.50 for the Great Yarmouth Selective Licensing proposals) instead of the full application fee up front, as in most other Selective Licensing Schemes, is also well-received, meaning that landlords do not need to pay significant sums of money initially, and can budget for the low monthly costs across the term. Also, the monthly costs can be fully offset – even to the extent of making the landlords money – due to the offers, services, and preferential savings that come as part of the Landlord Support Scheme membership package. Examples from the Doncaster and West Lindsey Schemes include:

- Free training to landlord members;
- Quarterly landlord forums;
- Discounted mortgage rates from Lloyds Bank;
- Discounted landlord insurance from Lloyds Bank;
- Mediation between landlord and tenant, and between tenants (including their tenants and other landlords' tenants)
- B&Q Trade Point Card with 30% discount on everything, plus higher discounts on useful items for landlords, which have been identified by the Landlord Support Scheme;
- 18 languages available for online application forms;
- Accredited local tradesmen and businesses (a good local service for landlords, and boosts local businesses);
- Credit & reference checks;

The Council further understands that in future, the Landlord Support Scheme benefits for the the Doncaster and West Lindsey Schemes will expand to include:

- Rent collection for landlords via direct debit (thus solving the Universal Credit issue);

- A tenancy outcome database (it will include data from scheme members and their tenants, thus dealing with the problem of good references for poor tenants, and enabling tenants to identify poor landlords);
- A property marketing portal (a full available stock list of safe rented homes – thus saving on agency fees for landlords);
- A Landlord Support Scheme landlords-only insurance product from Towergate Insurance Brokers.

In addition to the aforementioned benefits to the landlords, tenants, and other stakeholders, these Landlord Support Scheme also undertake and promotes social investment where it works; for example, repairs are made to boundary walls using donated materials, and construction students, or youths are encouraged to litter pick in exchange for vouchers to access sporting facilities for free.

These proposals are therefore a genuine attempt to raise standards in the private rented sector, and to support the communities in which they are based, through training, support and development for landlords, their representatives, and tenants, underpinned with a robust legislative approach.

2.7 Proposed licence fee structure

The council proposes to charge a licence application fee to cover the cost of the administration of the selective licensing scheme. Indeed, the Council has a fiscal duty to do so. This income is ring-fenced and can only be used for Selective Licensing. It cannot be used to raise income for other Council functions.

The council believes that any scheme should minimise the financial burden on landlords. It therefore proposes that licence fees are reduced as much as is reasonably possible, without jeopardising the council's ability to undertake its statutory functions under selective licensing, or any of its other statutory duties.

For the purposes of selective licensing, an accredited landlord is a landlord who is accredited by the National Landlords Association (NLA), or under the Residential Landlords Association Accreditation Scheme (RLAAS), National Approved Lettings Scheme, and have maintained their CPD requirements. There are reduced fees for such accredited landlords, and also for early applications (see Appendix C).

All licence fees would be reviewed each financial year.

A licence would normally be granted for a period of five years and no further fees would be payable during the life of the licence, unless a Landlord Support Service membership is cancelled due to repeated or serious non-compliance, and then a new licence application would need to be made to the Council for the rest of the term. Licences are non-transferrable in accordance with section 91(6) of the Housing Act 2004.

The fees are for the whole period of the Selective Licensing designation, which is for 5 years from December 2018 to November 2023. Fees are based on the running cost and management of the overall scheme. There are a range of fees, which differ for single and multiple unit properties. There are also a range of reduced fees and penalties which relate to certain circumstances.

There are three fee scenarios, dependent on the type of building and ownership, as follows (also see Appendix C):

1. **Single unit properties:** This is for dwellings, which are a single unit, which could be a house, or a self-contained flat or non-self contained flat. The standard licence fee of £100 plus a monthly £9.50 'Landlord Support Service' fee, or lump sum licence fee of £525, applies in this case and this requires only one licence.
2. **Multiple unit properties where the landlord controls the freehold:** Where the landlord has the freehold of a block of flats a single licence will be issued for all the flats owned by the landlord plus the common parts of the building. The licence fee will

be the standard fee of £100 plus a monthly £9.50 'Landlord Support Service' fee for the first flat, plus £90 plus a monthly £9.50 'Landlord Support Service' fee for each extra flat within the same building. Otherwise the lump sum fee of £525 for first flat and then £515 for each additional flat within the same building can be paid. Where applicable, reduced fees will be applied to the total cost of the licence.

3. **Multiple unit properties where the landlord does not control the freehold:** Where the landlord owns multiple flats within a building but does not own the freehold, then each flat will require a separate licence. The licence fee for the first flat will be the standard fee of £100 plus a monthly £9.50 'Landlord Support Service' fee, whilst the licence fee for any extra flats in the block will be £90 plus a monthly £9.50 'Landlord Support Service' fee for each extra flat. Otherwise the lump sum fee of £525 for first flat and then £515 for each additional flat within the same building can be paid. Reduced fees will only be applied to the total cost of the flats to be licensed in the block and will not apply to each individual flat in the block, as the licence fee for the extra flats has already been substantially reduced.

Payment schedule

Licence fees must be paid in full at the time of application, and cannot be paid in instalments. However, the Landlord Support Scheme membership fees, can be paid monthly to the Delivery Support Partner.

2.8 Licence conditions

Each new licence granted would be subject to a series of licence conditions. Licence conditions under selective licensing must include the mandatory conditions set out in Schedule 4 of the Housing Act 2004 and may include additional conditions relating to management, use and occupation. The proposed additional conditions have been drafted, following a conditions review.

In summary, the mandatory conditions would require licence holders to:

- Provide gas safety certificates annually (if gas is supplied);
- Keep any electrical appliances and furniture provided in a safe condition;
- Provide suitable smoke alarms and keep them in good working order;
- Require references from prospective tenants;
- Issue residents with a written statement of the terms of occupation (e.g. a tenancy agreement or licence);

The proposed additional Selective Licensing Conditions would require licence holders –with the support of guidance – to:

- Provide electrical installation condition reports for the fixed wiring installations at intervals of not more than five years;
- Ensure the safety of any furniture and furnishings that are provided;
- Ensure fire safety;
- Provide reasonable terms of occupation;
- Make suitable arrangements for completing routine repairs and maintenance;
- Undertake an energy efficiency assessment if required;
- Limit occupation of the property to the numbers of persons and households specified in the licence;
- Provide adequate security to the property;
- Ensure the proper use of, and provide keys to tenants for any alley gates to the rear of the property;
- Maintain external areas;
- Make suitable arrangements for refuse and waste;

- Appropriately manage anti-social behaviour, should it ever originate from their property;
- Ensure that anyone involved with managing the property is a 'fit and proper person';
- Ensure management arrangement during their absence;
- Comply and cooperate with the Council, and any property inspectors;
- Advise the council of any change in circumstances.

The council believes that such licence conditions are not onerous, and that good landlords are unlikely to find that their practices need be changed.

2.9 Housing strategy

Any proposal to introduce a selective licensing designation must be consistent with the council's overall housing strategy.

The council's overarching housing vision is within its 'Great Yarmouth Borough Council: Housing Strategy 2018 - 2022', echoed from the Corporate Plan 'The Plan 2015-2020', where it is envisaged that there will be *"An attractive mix of housing that will be fit for purpose for all and meet both the borough's existing and future needs. There will be good quality housing for all sectors of the community and workforce. An attractive mix of housing that will meet the Borough's needs"*

The Strategic Objectives of the Housing Strategy include:

- Decent homes: providing a good mix of decent homes across all tenures;
- Healthy homes: meeting the needs of vulnerable households.

The Strategic Aims of the Housing Strategy include:

- Explore a selective licensing scheme for HMOs;
- Target the most hazardous private sector properties and non-compliant landlords through effective preventative and enforcement action;
- Establish a Landlord's Forum to improve dialogue with private sector landlords and better management practice;
- Work with other agencies to target vulnerable households to help improve energy efficiency and reduce fuel poverty;
- Strengthen partnership working opportunities with statutory and voluntary agencies to ensure early intervention and the effective use of resources;

- Improve joint working with and support for private landlords who are looking to improve their property conditions.

The Housing Strategy specifically sets out the aim to explore a Selective Licensing Scheme, which is being done through this consultation, and the evidence gathered to inform the process. The proposal to designate a Selective Licensing Scheme is therefore wholly consistent with the council's Housing Strategy.

Furthermore, the 'Great Yarmouth Borough Council - Research on the Private Rented Sector (PRS)' report by RR Consultancy, advocated: *"To consider implementing either an authority-wide landlord selective licensing scheme or voluntary landlord accreditation scheme, and consider ways in which they can be incentivized e.g. to offer training and support for accredited landlords, or to negotiate discounted rates at local DIY stores and / or with local services (such as builders, joiners, electricians and plumbers) to accredited landlords. The aims of the schemes are to enforce minimum standards, ensure tenant rights are adhered to, provide training and support, and to promote good practice."* This is exactly what the Council is proposing through Selective Licensing, and with a Service Delivery Partner, that can provide the wider benefits and incentives.

2.10 Existing Housing Initiatives

It is important for local housing authorities to demonstrate how licensing will work in conjunction with existing initiatives, and to deal with displacement issues.

Compulsory Purchase Orders

Great Yarmouth Borough Council has used its powers to CPO properties in differing levels as part of all previous projects. 13 CPO's had been completed since 2000 (as of July 2016) as for the majority of owners approached, the threat of a CPO is enough to encourage engagement, or push the owner into action themselves.

Compulsory Purchased Properties have been used for temporary accommodation, and enabled the Council to end expensive leases tied to unsuitable properties without losing the bed spaces.

Landlord Liaison Service (Homeless prevention)

The Council works with tenants, to help secure, or retain, their accommodation, through a 'Personalised Housing Plan'. This is regularly reviewed and support given to tenants.

Deposit Bond Scheme

The Council operates a Deposit Bond Scheme, where they guarantee the deposit for the landlord and tenant. For example, where tenants have a local connection, are homeless or threatened with homelessness, have no other way of securing a private rented property – typically a deposit equivalent to 6 weeks rent – and have a good tenancy history.

Property Officer

The Council has recently recruited a Property Officer in order to communicate with and support landlords and letting agents in finding suitable tenants, and placing them within their properties.

2.11 Expected benefits of a designation

Selective licensing provides additional powers to help the council tackle poorly managed privately rented property. Better management standards in this sector should contribute to an overall improvement in conditions in the proposed designated area. In particular, the council would expect a further designation to contribute to:

- An improvement in the social and economic conditions in the area;
- A reduction in anti-social behaviour;
- An improvement in general housing conditions;
- A reduction in the level of deprivation; and
- A reduction in crime.

Such improvements should lead to the area becoming more desirable. In the longer term, this should reveal itself in higher property and rental values, and a more stable community with less resident turnover.

2.12 Alternatives to selective licensing

As part of the investigation, alternatives to Selective Licensing were looked at to see if they could achieve the aims of reducing crime, ASB, deprivation, and low housing demand, and improving the housing conditions for residents.

Do Nothing

Maintain current reactive strategy in respect of private rented houses in single occupation. Houses in Multiple Occupation (HMO) of three or more storeys rented to five or more persons forming two or more households are covered by Mandatory HMO Licensing under

the Housing Act 2004. The cost of inspection and administration of this scheme is covered by fees according to the size of the building. To do nothing will not bring about wholesale improvements to the area, there being only 62 licensed HMOs within the whole Borough. The numbers of licensed HMOs should increase by the end of October, with the removal of the 'three storeys rule'. However, the increase in Mandatory Licensed HMOs is likely to only be modest, and only make up a small proportion of the entire Private Rented Sector (PRS), meaning that this would only have a minimal impact compared to the aims of a Selective Licensing Scheme.

Landlord Accreditation Scheme

Great Yarmouth Borough Council has previously operated a Landlord Accreditation Scheme, with incentives for membership, in an attempt to improve private rented dwellings and the other issues that Selective Licensing aims to address, as well as support and advise landlords. However, only one landlord signed up for accreditation during the two years that the scheme, so this was not a success, and a similar result would be anticipated if an accreditation scheme was launched again.

Some landlord associations operate their own accreditation schemes, in order to support and train landlords. However these schemes have not been shown to be enough to remove the need for Selective Licensing.

Implement Additional Licensing

This scheme would allow the Council to licence all HMOs throughout a designated area of the Borough, irrespective of number of storeys although person and household tests would still be applicable. Overall costs would be partly recoverable via the licence fees. Whilst this option will provide greater scope to tackle more HMOs, there is a lack of evidence to show that it alone will support the overall aims of the proposed area particularly around ASB and crime. Also, with the expansion of Mandatory HMO Licensing by the end of October 2018 – due to the incoming removal of the 'three storeys rule' – Additional Licensing would licence very few if any additional properties.

Interim and Final Management Orders

In certain circumstances relating to unlicensed premises, the council has the power to make Interim and Final Management Orders. Such orders authorise the council to take control of the residential premises to which the order relates. This power is reserved for the most problematic properties and is only considered as a last resort. It is also not appropriate in this context, as properties would be addressed in a piecemeal property-by-property basis, rather than strategically and systematically addressing issues. Also, a significant number of

properties may need to be managed in this manner, which is too resource-intensive for the potential benefit.

Implement Selective Licensing within a specific geographical area

Selective licensing will allow the Council to introduce a scheme to licence all private rented properties, irrespective of tenure and building size (save for Mandatory Licensed HMOs).

This scheme considers the wider health and community issues associated with poor housing and irresponsible landlords, involving a significant multi-agency approach. The general costs of inspection and administration of the scheme are covered by fees levied for each licence depending on the property description and how it is occupied.

In terms of ASB, selective licensing has a wide-ranging impact. All licence holders are required to take reasonable steps to deal with ASB perpetrated by their tenants. While the council and the Police can, and do, intervene when such behaviour occurs, it is on a case by case basis. While the new tools and powers contained within the Anti-social Behaviour, Crime and Policing Act 2014 allow more flexible use of interventions, no other mechanism, apart from Selective Licensing, can have such an immediate and significant impact on an area dominated by the private rented sector and higher than average levels of ASB.

Selective Licensing creates a culture in which landlords are more likely to tackle problems, rather than ignore them.

It is therefore considered that a Selective Licensing Scheme will be able to best deliver the Council's and partners aspirations for the area and is the preferred option.

Other courses of action that will contribute to the above-mentioned objectives have already been implemented and are part of the coordinated response to the problems experienced in the area. These are described in Chapter 4: Complementary Initiatives.

3 Supporting evidence

3.1 Overview

The council is of the opinion that the area proposed for designation meets five of the six legal tests set out in the Housing Act 2004 and regulations made thereunder. The designation is proposed on the basis of low housing demand, anti-social behaviour, housing conditions, deprivation, and crime. A designation based on migration is not proposed. Only one test needs to be proved to make a designation lawful.

The council considered data from a wide range of sources, collated and analysed by M·E·L Research (who have undertaken this work for numerous local authorities in support of Selective and Additional Licensing Schemes) before coming to this conclusion. This chapter outlines the key evidence that supports the proposed designation.

For clarity for the reader, and to present evidence regarding the challenges faced by Great Yarmouth's communities, the following evidence will be presented in most cases at the Government LSOA (Local Lower Super Output Area) level. These are basically communities or areas that the UK Government use for Census and Office of National Statistics data and reporting. There are five both in the Nelson Ward, and the Central and Northgate Ward. Each LSOA community has a code e.g. 'Great Yarmouth 006B', which can be used to identify the area on the maps, figures, and tables within this chapter, Chapter 2.1, and Appendix A.

3.2 Housing stock overview

Number of properties and residents

The Nelson, and Central and Northgate Wards are urban areas characterised by a high density of dwellings and occupants, within mostly older 19th and early 20th century terraced housing, flats, and houses of multiple occupation. This is in stark comparison with much of the rest of the Borough, where the housing stock is much less dense, has fewer stories, and is quite often newer. An example of this is where the 006E LSOA community in Nelson Ward has over 300 more residents, and almost 200 more properties than the majority rural 005B LSOA in Central and Northgate Ward, and within an area one-tenth the size of 005B.

The high density housing stock is demonstrated by the fact that Nelson Ward has 9.4% of the Borough's dwellings, and Central and Northgate Ward has 7.8%, with both Wards equating to 17.2% of all all dwellings in the Borough, within just 5.9% of the entire geographic area.

With regard to the high density of residents, 8.9% of the Borough's residents live within Nelson Ward, and 8% of the Borough's residents live within Central and Northgate Ward. Between the two Wards, 16.9% of the Borough's residents live within 5.9% of the land space.

Private rented properties

The private rented sector (PRS) has grown to 20% of all dwellings within the Borough of Great Yarmouth, similarly to the 20% for the whole of England private rented sector (according to the English Housing Survey 2016 to 2017, published January 2018). The PRS within both Nelson, and Central and Northgate Wards is more than double that for England, with both at 44%, and Nelson Ward with 21% of the Borough's entire PRS, and Central and Northgate having 20%.

However, what is very striking, when the localised LSOA areas are examined (see Table 5 and Figure 6), is that three communities within Nelson Ward (006B, 006C, and 006E), and one within Central and Northgate Ward (005D), are dominated by a majority private rented sector – over 60% in three areas. The private rented sector in each of these communities is so large that it includes around 500 or more dwellings, and represents between 5 and 7% of the private rented sector for the whole Borough.

Pre-qualification criteria

The four new tests or “sets of conditions” are set out in The Selective Licensing of Houses (Additional Conditions) (England) Order 2015 (SI 2015/977), hereinafter referred to as the “Order”. However, before they can be applied, there are two initial legal tests that must first be met. They are set out in Article 3(1)(a) and (b), and are:

- (a) that the area contains a high proportion of properties in the private rented sector, in relation to the total number of properties in the area;*
- (b) that the properties referred to in sub-paragraph (a) are occupied either under assured tenancies or licences to occupy.*

The first test has been met, due to the size of the PRS, as discuss in the ‘Private rented properties’ section above, and the second test has been met, as the council is aware that almost every privately rented property in the proposed designated area is the subject of an assured shorthold tenancy agreement (AST).

In the council's opinion, the pre-qualification criteria have been met, and the four new sets of conditions may be applied if appropriate: housing conditions, migration, deprivation, and crime. These conditions, or criteria, will be considered and evidenced, during the rest of chapter 3.

3.3 Low housing demand

This legal test is set out in section 80(3) of the Housing Act 2004. For an area to be designated under this section, the conditions are:

- (a) that the area is, or is likely to become, an area of low housing demand; and*
- (b) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, contribute to the improvement of the social or economic conditions in the area.*

Section 80(4) goes on to say:

In deciding whether an area is, or is likely to become, an area of low housing demand a local housing authority must take into account (among other matters) –

- (a) the value of residential premises in the area, in comparison to the value of similar premises in other areas which the authority consider to be comparable (whether in terms of types of housing, local amenities, availability of transport or otherwise);*
- (b) the turnover of occupiers of residential premises;*
- (c) the number of residential premises which are available to buy or rent and the length of time for which they remain unoccupied.*

Property prices

Considering the mean average residential property prices paid within the Nelson, and Central and Northgate Ward LSOA communities for 2017 (see table 6), they are all significantly below the average prices paid for Great Yarmouth as a whole (£198k), and for Norfolk (£269k). Indeed, 6/10 are less than half of the Norfolk average, with the other four, only slightly above this. Furthermore LSOAs 006C, 006E, and 005D are both less than £100,000 and less than half of the Great Yarmouth average, and similar to the prices that would have been paid in Norwich two decades ago for equivalent accommodation. Clearly, low housing demand has depressed property prices with the two Wards, making it an attractive area for the PRS. Figure 7 shows the the depressed prices within the LSOAs, compared to 005B, which solely due to the £9M sale of the Premier Inn, is shown as a typical sale price banding for the rest of Norfolk.

Turnover

Turnover data, particularly in the private rented sector, is not readily available, particularly at LSOA level. While anecdotal evidence may be available (e.g. from letting and estate agents), it wouldn't be able to show turnover at the precise LSOA level, so has not been included. Furthermore, such findings would not capture the true picture of informal, unrecorded lettings

that are made directly between landlords and tenants – some of which are made without the legal protection of a tenancy agreement.

Mandatory HMOs

We can see from Table 7 that Great Yarmouth currently has 62 Mandatory Licensed HMOs, with 89% of these within the two Wards; 33 or 53% within Nelson Ward, and 22 or 35% within Central and Northgate Ward. Clearly the depressed property prices that are symptomatic of low housing demand, have helped made these Wards an attractive place for setting up high residential density HMOs. This is evidenced clearly in that the three LSOAs with average prices of less than £100,000, and also less than half of the Great Yarmouth average (see Table 6), all have licensed HMOs in double figures.

Empty residential properties

Great Yarmouth had 271 empty homes on record during April 2018, with 251 of these, or 93% of these found within the two Wards; Nelson Ward had 145 of 54% of the Borough total, whilst Central and Northgate Ward had 106, or 39% of the total. In all but three of the LSOA, the average number of weeks that the homes were empty, were around two-and-a-half to three years. The lowest duration was the Council House dominated 006D, at 68 weeks. The figures are astounding, and also typical of an area with very low housing demand, as may be found within deprived communities in UK seaside resorts.

Empty business properties

Empty business properties can be used as a proxy, to consider low housing demand, as where there is less demand for housing, there will tend to be less disposable income, demand for services, and businesses, thus reducing the success and viability of businesses in the area, and the demand for these premises. During April 2018, Great Yarmouth had 206 empty non-domestic properties. Almost half (94) of these were located within the two Wards, with Nelson Ward having 29% of the Borough total, and Central and Northgate having 17%. This indicates that there is depressed demand for both residential and non-residential premises within the two Wards.

3.4 Anti-social behaviour

This legal test is set out in section 80(6) of the Housing Act 2004. For an area to be designated under this section, the conditions are:

(a) that the area is experiencing a significant and persistent problem caused by antisocial behaviour;

(b) that some or all of the private sector landlords who have let premises in the area (whether under leases or licences) are failing to take action to combat the problem that it would be appropriate for them to take; and

(c) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, lead to a reduction in, or the elimination of, the problem.

“Private sector landlord” does not include a registered social landlord within the meaning of Part 1 of the Housing Act 1996 (c. 52).

Nelson Ward had 990 cases of ASB crime that is dealt with by the Police reported in 2017, which is 27.9% of the ASB crime within the Borough. Central and Northgate Ward had 713 cases of ASB crime, which is 20.1% of all ASB crime in the Borough. Together the two Wards account for almost half (48.1%) of all the ASB crime dealt with by the Police in the Borough, which is a worrying statistic given the relatively small geographic area. The ASB crime appears to relate to the densest areas of housing in central Great Yarmouth, and the shopping areas, as seen in figure 8.

The Council's Environmental Services dealt with 151 ASB complaints within the two Wards, during 2017 – 74 in Nelson Ward, and 77 in Central and Northgate Ward. The LSOA with more than 10% on the the ASB complaints, also made up the majority in each Ward: 006B, 006C, 006E had 54 out of 74, or 73% of the complaints in Nelson Ward; and 005C and 005D, had 47 out of 77, or 61% ASB complaints. These LSOA communities therefore have the worst incidence of ASB in the Borough, as we already know from the preliminary investigations in Chapter 2, that these Wards had the greatest ASB demand in the Borough.

When considering the Environmental Crime data (see table 12), we can clearly see that the three most affected LSOA areas are 006B, 006C and 006E within the Nelson Ward, with the 275 crimes amounting to 11% of all Environmental Crime in the Borough.

There were 42 Pest Control requests within the Nelson, and Central and Northgate Wards during 2017, which was 8.3% of all the requests for the Borough. Whilst this is very high for a comparatively small area, it could have been expected to be higher, at a similar level as the 11% of Environmental Crimes, which can provide food and shelter for pests. We presume that the gap is due to the affordability of pest control for people on lower incomes.

3.5 Housing conditions

This legal test is set out in Article 4 of the Order. For an area to be designated under this article (subject to Article 3), the conditions are:

(a) that having carried out a review of housing conditions under section 3(1) of the [Housing Act] 2004 Act, the local housing authority considers it would be appropriate for a significant number of the properties referred to in article 3(1)(a) to be inspected, with a view to determining whether any category 1 or category 2 hazards exist on the premises;

(b) that the local housing authority intends to carry out such inspections as referred to in paragraph (a), with a view to carrying out any necessary enforcement action; and (c) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, including any licence conditions imposed under section 90 of the [Housing Act] 2004 Act, contribute to an improvement in general housing conditions in the area.

The BRE's 2017 report on behalf of the Council found that a significant minority of properties within all LSOAs in the two Wards, would have the very harmful category 1 hazards (see Table 13), under the Housing, Health and Safety Rating System (HHSRS), with a greater prevalence within the Private Rented Sector (PRS). Indeed, the LSOAs 006B, 006C, 006E, in Nelson Ward, and 004A, 005C, and 005D have around the same, or greater than the 20% PRS category 1 hazard rate for the entire Borough. Indeed, this 20% Borough-wide rate is higher than most people would expect, because you would not assume 20% disrepair across the Borough. However, this is heavily weighted by 'excess cold' hazards, due to the poor thermal efficiency of older, rural, and detached properties, though this is less recognised, as residents in the rest of the Borough will tend to be wealthier, and so can afford to heat their rented properties, without being in 'fuel poverty'.

LSOAs with a low PRS proportion of all dwellings, due to the high concentration of Council Houses, like in 006A and 006D (see Table 5) have the lowest percentage of all stock with Category 1 hazards, and interestingly they have a lower proportion in the PRS. The percentage of PRS Category 1 hazards/'HHSRS failures', can be seen in Figure 9.

The BRE also found within 2017, that at least one in 10 PRS dwellings within 5 of the LSOA had poor housing conditions due to disrepair: 006B, 006C, and 006E in Nelson Ward; and 004A, and 005D in Central and Northgate Ward. These 10% and 11% LSOA rates of disrepair compare with just 7% for the Borough as a whole, highlighting these LSOA as 'hotspots' for poor property conditions within the Borough. Indeed 7 out of 10 LSOAs had worse PRS housing conditions than the whole Borough.

Great Yarmouth Borough Council's Environmental Health investigated 99 private rented sector (PRS) housing complaints during 2017 – this does not include the significant number of complaints that were not progressed, due to tenant fear of retaliatory eviction. 83, or 84% of these complaints were made about properties in the two Wards, with Nelson Ward having over a third of all PRS property condition complaints (34) in the Borough, and Central and

Northgate Ward around half of all the Borough's complaints, with 49. It is astounding the proportion of PRS complaints the Council deals with in these comparatively small areas, and how almost all the the Environmental Health resources for housing inspections are used here. There are obviously very significant PRS housing condition issues within the two Wards, and so there is a major drain on resources dealing with them on a mostly complaint-driven, reactive basis at present.

Prosecutions

There were just three landlord prosecutions in 2015 and 2016 for failure to license and HMO and offences under management regulations. This highlights that though there are clearly housing issues that require regulation, enforcement, and prosecution, there is insufficient access into the worst properties, nor Environmental Health Officer resources to address them at present. Selective Licensing should help address both matters, by giving access to properties on a proactive (to complaints, which tend to close when the residents are evicted, or leave), rather than reactive basis, and increasing Officer/inspection resources.

3.6 Migration

This legal test is set out in Article 5 of the Order. For an area to be designated under this article (subject to Article 3), the conditions are:

- (a) that the area has recently experienced or is experiencing an influx of migration into it;*
- (b) that a significant number of the properties referred to in article 3(1)(a) are occupied by those migrants referred to in paragraph (a); and*
- (c) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, contribute to –*
 - (i) the preservation or improvement of the social or economic conditions in the area;*
and
 - (ii) ensuring that the properties referred to in article 3(1)(a) are properly managed, and in particular, that overcrowding is prevented.*

Great Yarmouth, being a Port Town and coastal Borough has historically had a lot of inward migration, over the centuries, as well as in recent years, from within the UK and abroad. This trend can be observed by the fact that after English, the main first languages within the Borough Poland, Portugal, and Lithuanian. However, the population growth (see Table 16), to the two Wards (20% for Nelson Ward, and 16% for Central and Northgate Ward, compared to 7% for the Borough, and 9% for the East of England) whilst significant, cannot

be used to evidence the Migrations criteria for designating Selective Licensing, as this is long-term, rather than short-term population increases: Government guidance suggests that the migration test should relate to relatively sudden increases in migration (say 15% over a 12 month period), and so a Selective Licensing Designation based upon Migration, is not proposed.

The data available on National Insurance Number registrations goes down only to MSOA level, which is larger than LSOA. These are presented below for the MSOAs that cover the two wards. MSOA 004, is only relevant to the LSOA 004A area in the north west of Central and Northgate Ward, while MSOA 005 covers the rest of Central and Northgate, and MSOA 006 fully covers Nelson Ward.

We can see that in these areas, along with the Borough as a whole, and the East of England, that there has been a fall of between one third and one half in inward migration. Presumably this decrease can be at least partly attributed to Brexit. Nelson ward had 42% of Great Yarmouth's migrant registrations in 2017, and Central and Northgate (if we allocate a proportionate quarter of the MSOA 004 figures) had 24.2%, meaning that approximately one third of all inward migration to the Borough was into these two wards. There are a variety of reasons for this, including exisiting communities and social networks, work and amenities within walking or public transport, cheaper accommodation due to larger buildings allowing shared/multiple occupation or due to a less desirable housing stock. Obviously denser occupation may not be desirable for the residents, legal, or through their own choice, as unfortunately some of these residents are thought to be exploited, or trapped within modern slavery.

3.7 Deprivation

This legal test is set out in Article 6(1) of the Order. For an area to be designated under this article (subject to Article 3), the conditions are:

- (a) that the area is suffering from a high level of deprivation, which affects a significant number of the occupiers of properties referred to in article 3(1)(a); and*
- (b) that making a designation will, when combined with other measures taken in the area by the local housing authority, or by other persons together with the local housing authority, contribute to a reduction in the level of deprivation in the area.*

Article 6(2) goes on to say:

- (2) In determining whether an area is suffering from a high level of deprivation, the local housing authority may have regard to the following factors in relation to the area –*
 - (a) the employment status of adults;*

(b) the average income of households;

(c) the health of households;

(d) the availability and ease of access to education, training and other services for households;

(e) housing conditions;

(f) the physical environment; and

(g) levels of crime.

The Index of Multiple Deprivation ranks all LSOAs in England, with 1 being the lowest – or most deprived area. These are shown in table 18 below for the LSOAs in the two wards, along with the average rank for all Great Yarmouth LSOAs. Also showing is the decile (where the ranks are placed within 10% bandings based on their national rank) for the LSOA, and the average decile for Great Yarmouth, again with 1 being the most deprived area nationally.

All of Nelson Ward, and four out of five LSOAs in Central and Northgate Ward are amongst the top 10 most deprived area in the country, based on having a decile of one. Based on overall rank, 6 of them are amongst the 340 most deprived places in the country, with three in the top 100, and the LSOA centred around St. Peter's Road is the 20th most deprived place nationally. This is starkly shown in figure 10. In comparison, the Borough as a whole has a more moderate decile of 4, and only ranks 10,676th for deprivation.

Table 19 below, shows the total number of Disability Living Allowance and Employment & Support Allowance cases combined. There was a slight downward trend in the number of people on those benefits with both Wards, but not as significantly as for the whole of Great Yarmouth, and the East of England. During August 2017, Nelson Ward had 394 people on disability benefits (9.3% of the Borough total), while Central and Northgate Ward had 498 people on disability benefits (11.7% of those in the Borough). In total, 21% of the Borough's residents in receipt of disability benefits live in the two wards. This is highly disproportionate, and suggests that due to their lower incomes, people in receipt of disability benefits have no choice but to live in the cheaper, but poorer quality accommodation within these wards.

In both Nelson Ward (47.8%) and Central and Northgate Ward (42.9%) almost half of the Housing Benefit claimants live within the private rented sector (PRS), compared to around one third (36.5%) for the Borough as a whole. The majority of the rest of the claimants would be living in Council, or Social Housing.

With 511 PRS claimants, Nelson Ward has 20.9% of the Borough's PRS claimants, whilst Central and Northgate Ward has 21.4%, or 42% of the Borough's total PRS Housing Benefit claimants.

The figures show how large the PRS is within the two Wards, compared with the rest of the Borough, and the resultant increased deprivation of those on lower incomes.

3.8 Crime

This legal test is set out in Article 7 of the Order. For an area to be designated under this article (subject to Article 3), the conditions are:

- (a) that the area suffers from high levels of crime;*
- (b) that the criminal activity affects those living in the properties referred to in article 3(1)(a), or other households and businesses in the area; and*
- (c) that making a designation will, when combined with other measures taken in the area by the local housing authority, other persons together with the local housing authority or by the police, contribute to a reduction in the levels of crime in the area, for the benefit of those living in the area.*

During 2017 there were 3,170 crimes reported to the Police within Nelson Ward, and 2,591 crimes within Central and Northgate Ward (see table 21). These had respectively 25.2%, and 20.6% of all crime in the Borough, which is nearly half of all the crime (45.8%) within a very small geographic area.

The greatest incidence of crime was in the LSOA 005C, containing the Town Centre and Market, followed by 006B – which has parts of the Regent Road, Regent Street, and King Street shopping areas – then the rest of the northern part of Nelson Ward: 006C, 006D, and 006E, which can be clearly seen in figure 11.

3.9 Overall ranking

The evidence presented above shows the position within two Great Yarmouth wards: Nelson and Central & Northgate. To designate the proposed selective licensing scheme, this report has drilled down to the 10 LSOAs within these two wards.

In designating an area within a selective licensing scheme certain conditions must be met:

- Any area must contain more than the national average of private rented housing if designating on the grounds of property conditions, migration, deprivation or crime. The English Housing Survey 2016-17 (Ministry of Housing, Communities and Local Government, Jan 2018) shows 20% of all households are private rented.
- Local authorities can designate a selective licensing scheme without seeking confirmation from the Secretary of State providing the scheme covers no more than

20% of its geographical area or would affect more than 20% of privately rented homes in the local authority area.

- For schemes introduced because of a high level of migration, the guidance suggests this means a population rise of around 15% or more over a 12 month period. However, the data available in this report shows change over the period 2001 to 2011, not over the past 12 months.

Each of the LSOAs have been ranked from 1 to 10 on each of the relevant indicators (see Table 23 in Appendix C). Those ranked 1 are the worst on each indicator, while those ranked 10 are the best relative to the other LSOAs; ties are ranked at the lowest number.

Based on all the evidence combined, three LSOAs stand out: Great Yarmouth 006B, 006C, and 006E, which are all within Nelson Ward).

As well as scoring the worst rank overall, all three of these LSOAs scored the worst rank in more indicators than any others (11, 10, and 11 times respectively). They are all in Nelson ward. They have considerably more private rented housing than the national figure, up to three times as high in two of the LSOAs. Together, they make up 18.21% of the total PRS stock, so under the 20% limit before needing the Secretary of State's confirmation. These three LSOAs combined make up just 0.57% of the surface area of Great Yarmouth Borough Council, so well under the 20% threshold.

The next two worst ranking LSOAs are Great Yarmouth 005D (overall average rank 4.22) and Great Yarmouth 005C (4.33), both in Central & Northgate ward. However, even adding just one of these LSOAs would push the selective licensing scheme over the 20% threshold of PRS housing, therefore demanding confirmation from the Secretary of State.

Therefore, on the basis of all the collated and analysed evidence presented, we recommend that the most appropriate course of action is to designate a selective licensing scheme, which covers the three identified LSOAs within Nelson Ward. This should bring the greatest benefits for these most challenged communities, and the of Great Yarmouth as a whole, and without the delays and cost to the tax payer that an application to the Secretary of State would involve.

4 How to make comments on this proposal

4.1 How to make representations

To respond to the public consultation, go online at www.great-yarmouth.gov.uk/have-your-say and complete the online consultation.

Alternatively, you can collect and submit a paper version of the consultation document at the following locations:

- Great Yarmouth Borough Council, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF
- Comeunity, 135 King Street, Great Yarmouth, NR30 2PQ
- GYROS, The Books & Beans Cafe in The Central Library, Tolhouse Street, Great Yarmouth, NR30 2SH

If you have a query which has not been addressed by this consultation document, please call 01493 846478 and an officer will be able to help.

The ten-week public consultation will run from the 15th June 2018 – 24th August 2018.

4.2 Consultation methods

We will consult on this selective licensing proposal in the following ways:

Public and social media

The consultation will be fully publicised on the council's website at www.great-yarmouth.gov.uk/have-your-say, where online responses can be made. This document will also be available to download as a pdf document.

Press releases will be issued, and interviews given to TV, radio, and newspapers.

The council's Twitter and Facebook accounts will also publicise details of the consultation:

- @greatyarmouthbc – Twitter, Facebook & Messenger
- www.facebook.com/greatyarmouthcouncil/ - Facebook

Landlord associations

The following landlord associations will be consulted directly by email:

- Eastern Landlords Association (SLA);
- National Landlords Association (NLA); and,
- Residential Landlords Association (RLA).

Great Yarmouth Borough Council

The Council is also hosting a Landlord Consultation Event on the Selective Licensing Proposals on Monday the 18th of June, between 6 and 7.30 pm, in the Assembly Room, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF.

Member of Parliament (MP)

The Member of Parliament for the Great Yarmouth constituency, the Rt Hon Brandon Lewis MP, will be consulted directly in writing.

Local community groups

Relevant local community groups will be consulted by the most appropriate means. The initially identified groups include:

- The Comeunity Residents Board;
- GYROS;
- Neighbourhood Lunch.

Partner Organisations

Partner organisations, Emergency Services, Health Services, Regulatory Services, service providers, and Charities will be contacted directly, or through the multi-service 'Early Help Hub', at the Council.

Stakeholder drop-in sessions

The council will hold two Selective Licensing Consultation Drop-In Sessions, for all parties who may have an interest in the proposals, including landlords, tenants, letting agents, other residents, businesses, charities, and statutory organisations:

- Monday 18th June 2018, between 9.30 am and 4 pm, in the Assembly Room, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF;
- Monday 25th June 2018, between 9.30 am and 4 pm, in the Rumbelow Gallery, Central Library, Tolhouse Street, Great Yarmouth, NR30 2SH.

No appointments are necessary and everyone will be welcome. Council officers will be on hand to answer questions about the Selective Licensing proposal.

Access to paper copies of this consultation document

Copies of this proposal and associated leaflets will be available to view at the following locations for the duration of the consultation. All locations have internet facilities for public use, which will enable you to complete the online survey:

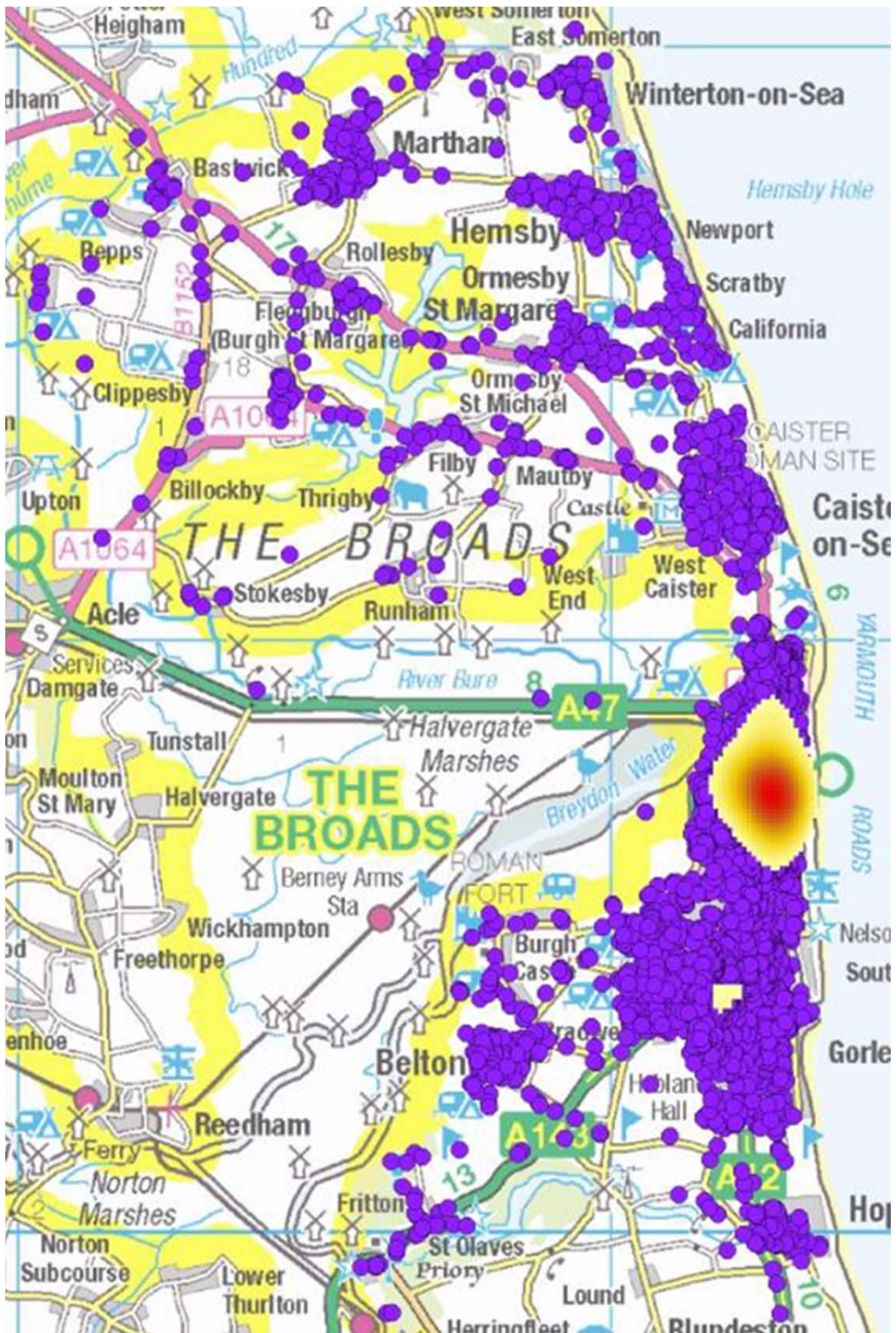
Great Yarmouth Borough Council

- Great Yarmouth Borough Council, Town Hall, Hall Plain, Great Yarmouth, NR30 2QF
- Comeunity, 135 King Street, Great Yarmouth, NR30 2PQ
- GYROS, The Books & Beans Cafe in The Central Library, Tolhouse Street, Great Yarmouth, NR30 2SH

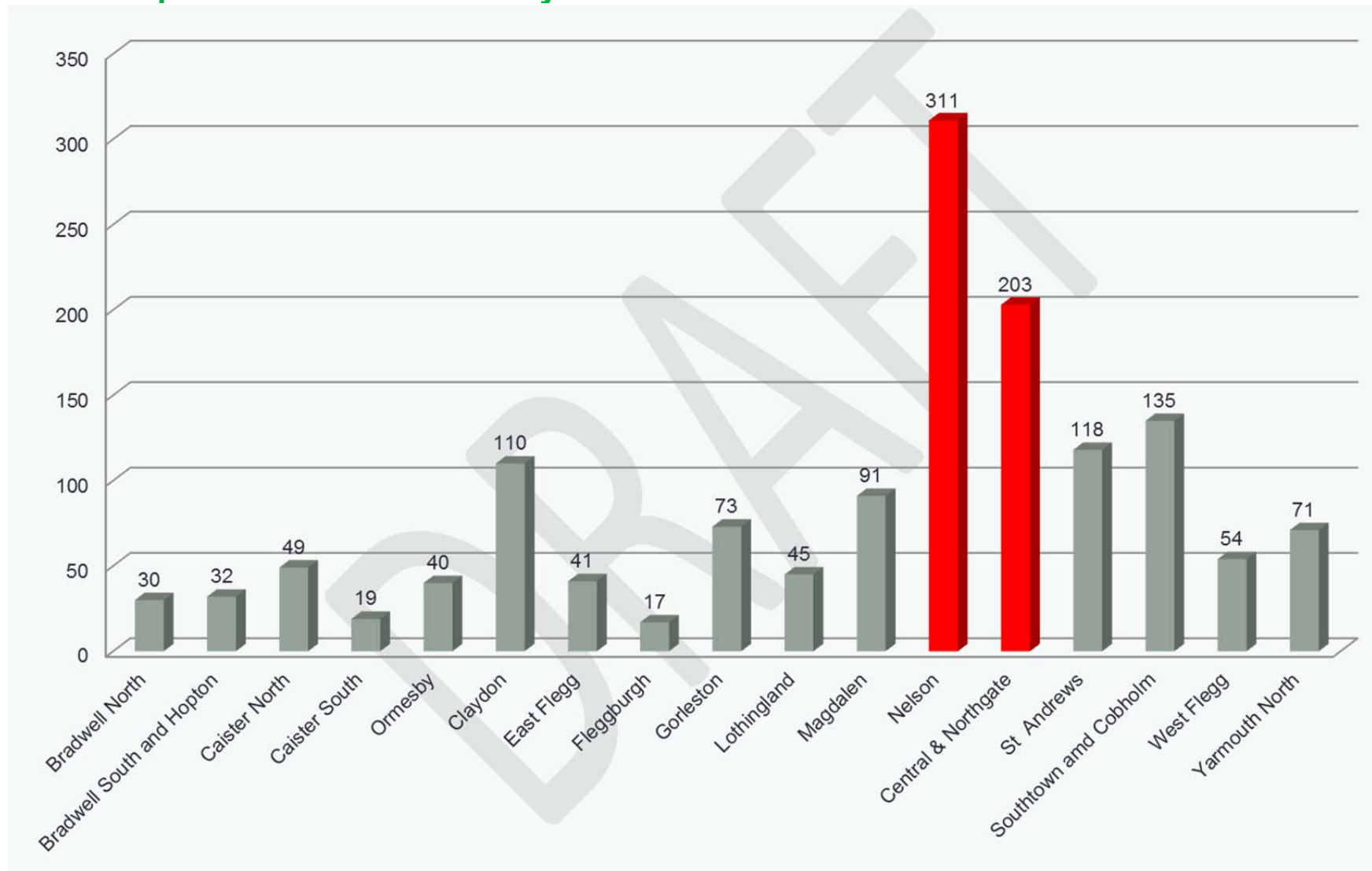
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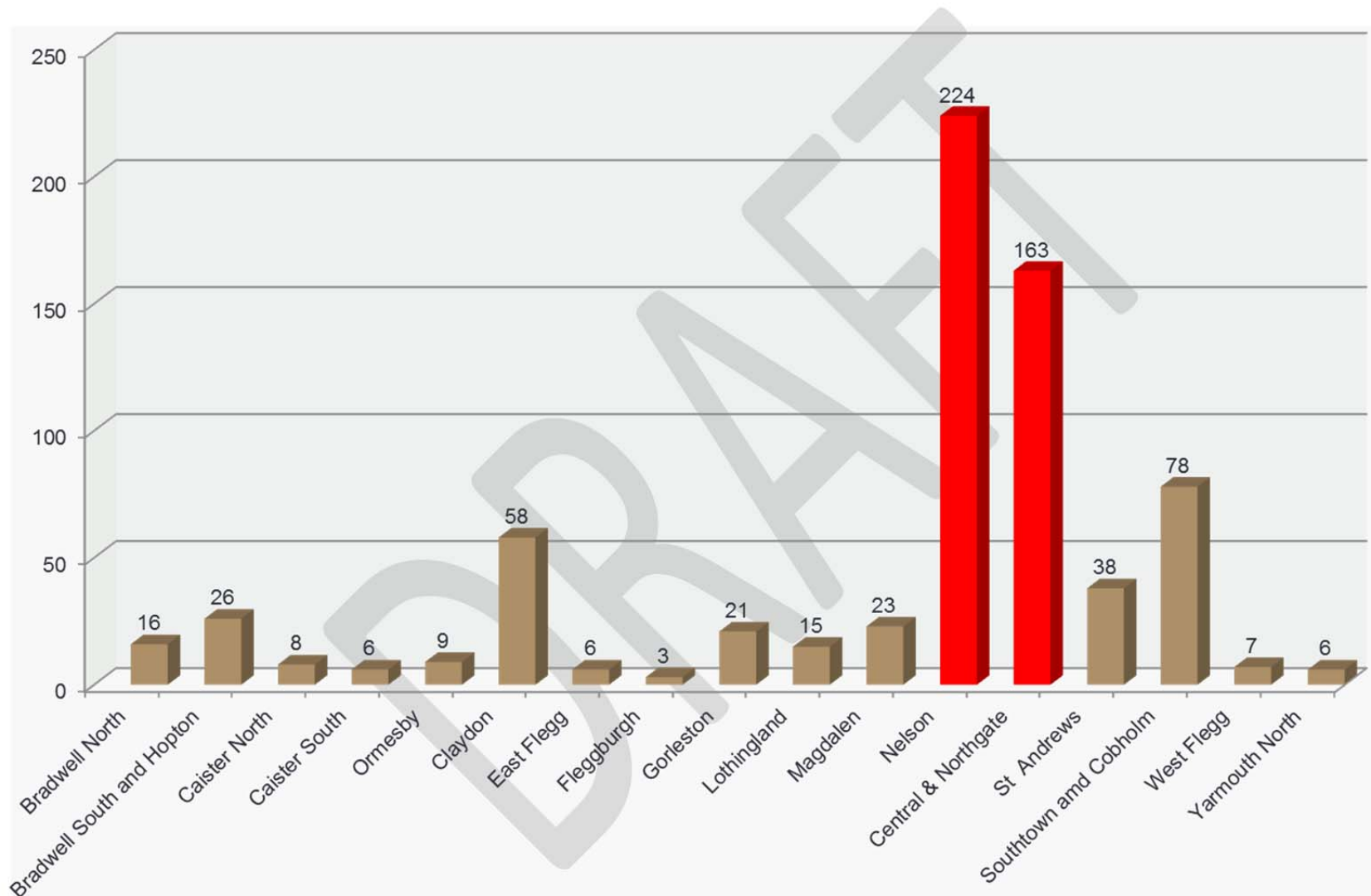
Police CAD Map



ASB complaints 3/2014 - 9/2016 by Ward



Housing complaints 3/2014 – 9/2016 by Ward



Appendix B: Selective Licesning fees and charges

Standard Fees

Property Type	5 year licence fee and payment options	
	Monthly fee – Landlord Support Scheme	Up front – Landlord Support Scheme
Single occupancy household For each dwelling which is occupied by a single household (eg house, self-contained flat or non self-contained flat)	£90 + £9.50/month (which totals £660)	£515
Buildings containing flats where the landlord owns the freehold⁽¹⁾ A single licence will be issued covering all of the flats within the control of the landlord	£90 + £9.50/month for first flat (which totals £660) and then £80 + £9.50/month for each additional flat within the same building (which totals £650 for additional flats)	£515 and then £505 for each additional flat within the same building
Buildings containing flats where the landlord owns more than one flat in a building without owning the freehold As the landlord does not own the freehold, then each flat will require an individual licence	£90 + £9.50/month for first flat (which totals £660) and then £80 + £9.50/month for each additional flat within the same building (which totals £650 for additional flats)	£515 and then £505 for each additional flat within the same building

Great Yarmouth Borough Council

Reduced rates ⁽²⁾	Monthly fee (Landlord Support Scheme)	Up front (Landlord Support Scheme)
Accredited membership of selected organisation Reduced fees will apply to accredited members of one of the following organisations: National Landlords Association Residential Landlords Association National Approved Lettings Scheme	£70 + £9.50/month (which totals £650)	£495
Early application reduced fee Applies to all licence applications received and fully completed with all requested documentation by the 14 th of March 2019 (i.e. within 3 months of the designation of scheme).	£70 + £9.50/ month (which totals £650)	£495

Penalties⁽³⁾

Penalty	Amount
Late Application Applications received 6 months after commencement of scheme (e.g. June 2019).	£1000 Applies to each licence application

Finder's Fee Applies where a licensable property is identified by the Council after June 2019 and no application has been submitted. Landlords who have failed to licence any such property may also be subject to prosecution by the Council.	£1000 Applies to each licence application
Incomplete application Incomplete application: e.g. incomplete information, application form not signed, failure to provide certificates and requested documentation within an agreed timescale.	£25 Applies to each licence application

Notes

- (1) This only applies where the applicant is in control of the whole building (e.g. a landlord who owns the whole block). In cases where the applicant has one or more flats within a building, but do not have full control of the block, then the applicant will require individual licence applications for each flat in the block.
- (2) Where applicable, all reduced rates can apply to the same licence application. In the case of multiple flats within the same building where the landlord is not the freeholder, the rate will only apply to the initial application
- (3) Applicants will not be entitled to reduced fees where a penalty fee has been applied.

Appendix C: Evidence Base

Table 4: Properties, residents and areas

Area	Number of residents	Number of properties	% Great Yarmouth surface area
Nelson ward	8,681	4,164	1.71%
Great Yarmouth 006A	1,642	646	0.81%
Great Yarmouth 006B	1,542	826	0.13%
Great Yarmouth 006C	1,798	964	0.08%
Great Yarmouth 006D	1,795	781	0.09%
Great Yarmouth 006E	1,904	947	0.36%
Central & Northgate ward	7,786	3,445	4.2%
Great Yarmouth 004A	1,432	613	0.09%
Great Yarmouth 005A	1,562	634	0.29%
Great Yarmouth 005B	1,577	764	3.31%
Great Yarmouth 005C	1,507	629	0.29%
Great Yarmouth 005D	1,708	805	0.22%
Great Yarmouth	97,227	44,355	100%

Source: 2011 census; ONS (Oct 2017) Mid-2016 population density for lower layer super output areas in England and Wales

Table 5: Private rented properties

Area	Number of PRS properties	PRS % all stock	% of total PRS
Nelson ward	1,849	44%	20.66%
Great Yarmouth 006A	94	14%	1.05%
Great Yarmouth 006B	486	61%	5.43%
Great Yarmouth 006C	617	62%	6.89%
Great Yarmouth 006D	125	15%	1.40%
Great Yarmouth 006E	527	56%	5.89%
Central & Northgate ward	1,782	44%	19.91%
Great Yarmouth 004A	265	43%	2.96%
Great Yarmouth 005A	283	33%	3.16%
Great Yarmouth 005B	220	30%	2.46%
Great Yarmouth 005C	525	49%	5.87%
Great Yarmouth 005D	489	63%	5.46%
Great Yarmouth	8,951	20%	100%

Source: BRE (2017) Dwelling level stock model

Figure 6: Private rented housing as % of all stock 2017

