

No	Recommendation	Response
1.	<p>Notifying neighbours of existing short-term holiday lets –</p> <p>a) BHRA must take active steps to notify all neighbours in writing that they are living near to a short-term holiday let. Information should be given to all properties that are likely to be affected by any disturbance, including those backing onto the holiday let or in the same street. BHRA should keep a record of who has been notified. This should be repeated annually.</p> <p>b) This notification should clearly identify the property and give neighbours information about what guest behaviour is acceptable, the contact details of the private noise patrol and other contacts in case of any disturbances. BHRA must ensure that they have a noise patrol in operation 24 hours a day during weekends and bank holidays.</p> <p>c) Noise patrols firms used must be British Standard compliant, use body or head cams to record all encounters and be SIA cleared and fully trained in conflict resolution. Written reports of incidents should be made within 24 hours.</p> <p>d) Noise patrol companies employed should use clearly identifiable vehicles and personnel should wear uniforms and carry identification with them at all times.</p>	<p>To be referred to Brighton & Hove Holiday Rental Association (BHRA) for its consideration. The actions are good practice and require self-regulation and management by BHRA. The arrangements for BHRA should not negate the facility for residents to report concerns to the Council. BHRA will require a high standard of quality management designed to ensure that it meets the needs of communities. If the council's Environmental Health team receives complaints directly, it would notify BHRA and let the resident know that it has done so. The Regulators' Code came into effect in April 2014 under the Legislative and Regulatory Reform Act 2006. It provides a clear, flexible and principles-based framework for how regulators should engage with those they regulate. Nearly all non-economic regulators, including local authorities and fire and rescue authorities, must have regard to it when developing policies and procedures that guide their regulatory activities.</p> <p>The Security Industry Authority is responsible for regulating the private security industry in the UK.</p>

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	<p>e) Those who raise noise complaints should be provided with a copy of the incident report made to the operator by the professional noise patrol, so it is clearly understood that their concerns have been addressed.</p> <p>f) In hours of daylight, the noise patrol should always attempt to knock on the doors of neighbours that have raised noise issues to let them know that action has been taken and a report will be shared.</p> <p>g) In hours of darkness or very early in the morning, the patrol should post a card through the letterbox of the neighbours who raised the original noise complaint to let them know the patrol has attended and that an incident report will be forward to them within 48 hours.</p> <p>h) If BHRA receive complaints, these should be resolved in line with their agreed procedures. The council's Environmental Health team should also be notified about the nature of the complaint and the response made. If the council receives complaints directly, it should notify BHRA and let the resident know that it has done so.</p> <p>i) The panel recommends that where a clear breach involving noise and Anti-Social Behaviour has been identified prompting the forfeiture of a group's deposit, the operators should actively consider donating the deposit direct to the neighbours as compensation or to a local neighbourhood community group.</p>	

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	<p>j) The panel recommends that all noise patrol reports from operators should be routinely be posted onto the BHRA website to help build confidence and in the spirit of transparency.</p> <p>k) In addition to the leaflets , BHRA should attach a sign to the front of each of their properties with details of the operator and contact details of who to contact in case of disturbances; this should be a 24/7 service.</p> <p>l) The panel would encourage BHRA to complete its website as quickly as possible so that it can become active and useful.</p> <p>m) BHRA should promote their website as widely as possible, for the benefit of residents, guests and operators. The panel would like the website to list the street addresses of all BHRA properties to enable residents and statutory agencies to be able to easily check whether a property is operated by BHRA. This would help identify who to contact if there are any issues.</p>	
2.	<p>Notifying neighbours of new short-term holiday lets-</p> <p>a) The panel heard that residents were aggrieved about the lack of notification if a new short-term holiday let was opened up in their neighbourhood. Whilst there is currently no statutory duty to consult with residents before establishing a short-term holiday let, BHRA should encourage potential holiday let operators to consult with and work with</p>	<p>To be referred to Brighton & Hove Holiday Rental Association for its consideration. Liaison with the local community is supported as sensible practice to avoid causing problems in communities</p>

	neighbours, before converting accommodation into holiday rental accommodation in order to open up lines of communication.	
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	<p>b) Operators should be encouraged to actively listen to neighbours' concerns and suggestions about how to minimise disruption.</p> <p>c) In areas where there is a Local Area Team or other community forum, BHRA should engage with the group to notify them about the forthcoming holiday let and address any concerns about anti-social behaviour that might be raised.</p>	
3.	<p>Working with the Council and VisitBrighton</p> <p>a) BHRA members should talk to VisitBrighton about how BHRA can work with the tourism body for the city. In turn, VisitBrighton should seek to work with BHRA to promote their positive practice and make any further suggestions that might arise in the future.</p> <p>b) There should be links between the BHRA website, the VisitBrighton website and Brighton and Hove City Council's website.</p>	<p>To be referred to Brighton & Hove Holiday Rental Association and VisitBrighton for consideration. Government is developing a proposed 'growth duty' for regulators, which would require regulators to take into account the impact of their activities on the economic prospects of firms they regulate. Ref: Autumn Statement 2012: Government announced that it would introduce a package of measures to improve the way regulation is delivered at the frontline including the proposed Growth Duty for non-economic regulators and the Accountability for Regulator Impact measure.</p>

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4.	<p data-bbox="271 397 658 432">Monitoring and overseeing</p> <p data-bbox="271 469 1160 759">a) As a way of monitoring the situation, in the instance of any complaints being received by statutory agencies, eg noise, refuse, fire safety, the statutory agencies call BHRA into the regular Joint Intelligence Meetings straight away and consider investigating the properties to take any action necessary. In this way, we can encourage the operators to be self-monitoring but retain an oversight and step in as soon as a problem arises.</p> <p data-bbox="271 799 1151 1129">b) The panel recommends that the council reserves the right to review the arrangements and bring the monitoring in-house if it is not deemed satisfactory. The first monitoring should take place after six months and the second should not take longer than 12 months after the report is agreed. It will be for council officers including Environmental Health and Planning Enforcement, and East Sussex Fire and Rescue Service and the Police to determine together with BHRA whether this is necessary.</p>	<p data-bbox="1173 397 2058 687">Not accepted. The Joint Intelligence Meeting has terms of reference agreed between Sussex Police, East Sussex Fire and Rescue Service and the City Council. The prescribed core membership comprises Environmental Health Managers, East Sussex Fire and Rescue, Planning Enforcement, Safe in the City Delivery Unit, Chief Inspector - Neighbourhood Policing, Police Operations (Licensing), Analyst and Minute Taker.</p> <p data-bbox="1173 727 1957 874">The terms of reference also gives examples of invited representation, which are all enforcement agencies: Highways enforcement, Housing, Adult Services and Children's' Services. Its stated aims and purposes are:</p> <ol data-bbox="1173 914 2011 1310" style="list-style-type: none"> <li data-bbox="1173 914 1980 1023">1. Discuss casework of note, other than high risk ASB, which is impacting on more than one service, or likely to benefit from a multi-agency approach. <li data-bbox="1173 1027 2011 1094">2. Review current intelligence in association with current casework. <li data-bbox="1173 1099 1980 1208">3. Agree a multi-agency response to complaints which don't necessarily sit within a team's primary statutory responsibilities. <li data-bbox="1173 1212 2011 1310">4. Identify opportunities to support other teams with their workloads and reduce the number of multiple visits/duplicated work, also creating time for our

		<p>communities and making best use of our time.</p> <p>5. Identify current problem priorities in the city and agree necessary actions and responsibilities, whether they involve enforcement or support.</p>
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		<p>6. Whenever possible seek to agree activities which are likely to achieve a permanent solution.</p> <p>7. Any information or intelligence discussed or shared is restricted to those agencies already permitted to share or according to any protective marking.</p> <p>Community intelligence (information from BHRA) would be welcome although for deliberate, operational reasons, joint information exchange meeting membership is exclusively enforcement agencies (see 7 above). Joint intelligence meetings are held fortnightly. Inclusion of private businesses would inhibit open information exchange and potentially impact on or undermine enforcement operations. It is recommended that BHRA report matters of concern to the relevant agency: police, environmental health, city clean, etc, who, in turn, determine intelligence to be discussed or shared. However, with reducing resources the enforcement officer joint intelligence meeting must keep this matter under consideration, particularly if complaints appear to rise again.</p>