






Arun Private Sector Housing and Public Health response

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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<https://www1.arun.gov.uk/planning-application-finder>



Our priorities...

 <p>Improving the wellbeing of Arun</p>	 <p>Delivering the right homes in the right places</p>	 <p>Supporting our environment to support us</p>	 <p>Fulfilling Arun's economic potential</p>	 
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From: Chantelle Bashford <Chantelle.Bashford@arun.gov.uk>
Sent: 27 October 2025 15:14
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/157/25/PL

Dear Planning

Please see Private Sector Housing comments below. These comments are in relation to general housing conditions and have regard to the Housing Act 2004, Housing Health and Safety Rating System (England) Regulations 2005 and LACoRS national fire safety guidance.

It is noted that room measurements have not been provided on the proposed floor plans therefore I am unable to provide any comment as to whether the room sizes are appropriate.

Fire safety

- Appropriate fire precaution facilities and equipment must be provided of such type, number and location as are considered necessary. Guidance on fire safety is contained in the LACORS guidance document – “Housing – Fire Safety, Guidance on fire safety precautions for certain types of existing housing”
- Flats 6 & 8 contain inner rooms. A room where the only escape route is through another room is termed an “inner room” and poses a risk to its occupiers if a fire starts unnoticed in the outer room. In both cases, the outer rooms comprise kitchens which are high risk rooms. This can be overcome by providing the following additional fire safety measures:

Flat 6

- Escape window installed to either the bedroom or living/dining room to provide an alternative means of escape;
- FD30S door fitted between the kitchen and hall; and
- Smoke detection installed to the outer room – as the outer room is a kitchen, liaise with a fire alarm engineer for best placement to avoid false alarms from cooking. If this cannot be overcome, an alternative could be to install the smoke detector within the hall and remove the smoke seals from the kitchen fire door, but you must liaise with a competent fire risk assessor in the first instance for their comments

Flat 8

- Escape window installed to the bedroom to provide an alternative means of escape;
- FD30S door fitted between the living/kitchen and bedroom; and
- Smoke detection installed to the outer room – as the outer room contains a kitchen, liaise with a fire alarm engineer for best placement to avoid false alarms from cooking. If this cannot be overcome, an alternative could be to install the smoke detector within the bedroom and remove the smoke seals from the bedroom fire door, but you must liaise with a competent fire risk assessor in the first instance for their comments

Whilst measures can be implemented to overcome the inner room scenarios, consideration should be given to reconfiguring the layout of the flats in question to prevent inner rooms.

Please be aware that an escape window should only be installed if the following criteria can be met:

- They serve rooms whose floor level is no more than 4.5m from the ground;
- Every room served by the escape window has access to it without entering another habitable room;
- If it is necessary to pass through the escape route to reach the window, consideration should be had to the travel distance involved;
- Occupiers are able-bodied individuals who can reasonably be expected to exit via the window unaided;
- There is no basement well or other encumbrance beneath the window such as railings or a conservatory;
- The escape window is openable from the inside without the need for a key and the ground below is level and free of obstructions; and

- The window should lead to a place of ultimate safety. However, if this leads into a courtyard or back garden where there is no exit, it should be at least as deep as the building is high
- The internal escape route should provide 30 minutes fire resistance, including any service cupboards and understairs areas, and 30-minute fire resisting and self-closing fire doors (FD30S) must be fitted to each flat entrance (with the exception of flats 1 & 6 as they have separate entrances) and the staff office. Doors to any service cupboards and understairs areas must also be 30 minute fire-resisting and kept shut with a latch and appropriate signage
- The ground floor storage cupboard located adjacent to the staff office must have the underside of the staircase underdrawn to protect the means of escape
- A mixed Grade A, LD2 and Grade D1, LD3 fire alarm system should be maintained and installed, as follows:

Grade A, LD2 system:

- Interlinked smoke detection throughout the escape routes including the staff office and any storage cupboards that have an ignition source (e.g. plug socket, meters, light fitting etc)
- Interlinked heat detection within each flat in the room/lobby that opens onto the escape route

Grade D1, LD3 system:

- Non-interlinked mains-wired smoke alarms with integral tamper-proof battery back-up to each self-contained flat (including the outer rooms within flats 6 & 8)
- Fire blankets should be provided to all kitchen areas
- Emergency lighting to be installed to the internal escape route due to the building being three storeys

Facilities

- The proposed bathrooms within flats 5 & 10 do not appear to be of an appropriate size and/or layout to provide adequate space for the user. From the proposed plans, the bathrooms appear very narrow and compact, increasing the likelihood of the users colliding with the walls and/or amenities around them. It is possible this could be identified as a “Collision” hazard under the Housing Health and Safety Rating System (HHSRS), therefore consideration should be given to reconfiguring both bathrooms

Ventilation

- Kitchens and bathrooms/shower rooms/ensuites should have adequate mechanical extraction in addition to any windows

Additional HMO Licensing Scheme – Section 257 HMO

- The Council introduced an Additional HMO Licensing Scheme in February 2025 which requires all 3-4 person HMOs, converted mixed-use buildings and **section 257 HMOs** to

have an HMO licence in the Hotham and Marine wards in Bognor Regis and River ward in Littlehampton. As this building falls within one of the affected wards, it may require an HMO licence. The building is a section 257 HMO if it fulfils **all** of the following criteria –

- it is a converted building or part of a converted building; **and**
- comprises self-contained flats; **and**
- the conversion work does not comply with 1991 (or subsequent) Building Regulations; **and**
- less than two-thirds of the flats are owner-occupied (that is a leaseholder lives in their flat with a lease granted for a term of more than 21 years);

If all of the above criteria is fulfilled a section 257 HMO licence is required.

General

- Must meet the requirements of the Housing Act 2004 and be free of Category 1 and significant Category 2 Hazards
- Must meet the requirements of any other associated Housing and/or Houses in Multiple Occupation legislation or regulations if applicable to the property/site

Kind regards







Private Sector Housing & Public Health

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Arun Additional HMO Licensing Scheme 2024

<http://www.arun.gov.uk/HMO>

HMOlicensing@arun.gov.uk

Note: I occasionally send emails outside of working hours. If this arrives outside of your normal working hours, please do not feel compelled to respond immediately.

From: Planning.Responses <Planning.Responses@arun.gov.uk>

Sent: 18 September 2025 11:19

To: EHPlanningConsultations <EHPlanningConsultations@arun.gov.uk>

Subject: Planning Consultation on: BR/157/25/PL

To: **Environmental Health - Planning consultation**

NOTIFICATION FROM ARUN DISTRICT COUNCIL

Town & Country Planning Act 1990 (as amended)

Town and Country Planning (Development Management Procedure) (England) Order 2015

Planning Permission

Application No: BR/157/25/PL

Registered: 17th September 2025

Site Address: 3 & 4 Queens Square Bognor Regis PO21 1SA

Grid Reference: 493658 99377

Description of Works: Change of use of properties from 2 No separate bed and breakfast accommodation units each having owners accommodation and communal lounge and dining areas at ground floor and 7 No B&B bedrooms at first and second floor to C2 (Residential Institution) use comprising staff room and 10 No C2 Supported Housing units. This application is in CIL Zone 4 (Zero Rated) as other development.

The Council have received the above application.

[Click here to view the application and documents](#) The website is updated once a day in the evening, so you may need to wait until the day after this notification to view the documents.

Should you have any comments to make, these should be sent by replying to this email by 16th October 2025 . You can also monitor the progress of this application through the Council web site:

<https://www.arun.gov.uk/planning-application-search>

The application will be determined having regard to the development plan policies (if any are relevant) and other material considerations. The development plan can be accessed via the website <https://www.arun.gov.uk/development-plan> as can information on what comments we can consider <https://www.arun.gov.uk/planning-application-comments>

Please be aware that any comments you may make will be available on our website so please do not insert personal details or signatures on your reply.

Should the application go to appeal the Planning Inspectorate will publish any comments made to the Council on their website: <https://acp.planninginspectorate.gov.uk/> but they will protect personal details.

In the absence of a reply within the period stated, I shall assume that you have no observations to make.

Yours sincerely

Harry Chalk

Planning Officer- Arun District Council

Telephone: 01903 737577

Email: harry.chalk@arun.gov.uk

PLCONSULT (ODB) 2020