

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Christian Melgar [REDACTED]
Sent: 22 October 2024 12:15
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/180/24/PL

Dear Planning

Please find response to Planning application BR/180/24/PL from Arun District Council Private Sector Housing and Public Health.

These comments are in relation to Houses in Multiple Occupation (HMOs) and have regard to the Housing Act 2004, The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006, The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018, Arun District Council's HMO Standards, Housing Health and Safety Rating System (England) Regulations 2005 and LACoRS national fire safety guidance.

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”
- The internal escape route should provide 30 minutes fire resistance, including any services cupboards and understairs areas, and 30-minute fire resisting and self-closing fire doors (FD30S) must be fitted to each bedroom and the kitchen-diner. Doors to any service cupboards and understairs areas must also be 30 minute fire-resisting and kept shut with a lock and appropriate signage. All doors must be fitted with intumescent strips, cold smoke seals, overhead self-closing device, inner thumb-turn latch and hung using three fire-rated hinges. No gap around the door should be greater than 4mm.
- A Grade A, LD2 fire alarm system should be installed comprising:
 - Mains-powered interlinked smoke detectors with integral battery back-up located throughout the escape route.
 - Where cooking facilities are sited within the bedsits: mains-powered interlinked heat detectors with integral battery back-up located in each bedsit; and additional Grade D, mains-powered non-interlinked smoke alarm with integral battery back-up located in each bedsit.
 - Where cooking facilities are sited in shared kitchen, not within bedsits: mains-powered interlinked smoke detectors with integral battery back-up located in each bedsit; mains powered interlinked heat detectors with integral battery back-up located in each kitchen; and additional mains-powered interlinked smoke detectors with integral battery back-up located in any cellar.
 - Mains-powered interlinked smoke detectors with integral battery back-up located in cupboards on the escape route that house electrical or gas intakes, consumer units or other potential ignition sources.
 - Emergency escape lighting on each level and staircase is appropriate as there is no effective borrowed light.
 - Fire blanket to be provided in each bedsit with cooking facilities and in shared kitchens. This should be located near to but not directly above, beside or behind the cooking facilities and at a height where it can easily be reached.
 - Final exit sign and signage along the escape route.
 - Smoke and heat detectors must be linked to a suitable Fire Alarm Control Panel.

- Emergency Break Glass Call Points located on each level of the escape route and each final exit from the building.
- Thumb-turn inner lock/latch to all final exit doors, including French and patio doors.

Room Sizes

- The room sizes indicated on the plans (if accurate) are appropriate for use of the property by eleven (11) persons, as per the application, and the size of the communal kitchen-diner. All room sizes must comply with Arun District Council's HMO Standards.

Licensing

- Any HMO that has five or more occupants will require a mandatory licence from the Council and the property must meet the Council's HMO Standards.

Bathroom Facilities

- Some of the proposed ensuite bathrooms do not appear to be of an adequate size or layout, with minimal drying and changing space and with inward opening doors that appear to require the user to squeeze into tight spaces to be able to open the door. Bathrooms must be of an appropriate size to provide adequate changing and drying space for the user. From the proposed plans, the ensuite bathrooms appear very narrow and compact, increasing the likelihood that users will collide with the walls and/or fixtures around them. Although there is no minimum size for a bathroom, generally bathrooms measuring less than 2m² are more likely to contain hazards which pose a risk to the users (it is noted that the measurements on the proposed plans are >2m²). However, the layout of bathrooms is equally important, as poorly located amenities can also create a risk to users. For example, if your elbows are touching the walls either side when standing in the bathroom, it is possible the case officer will determine it is not adequate and improvement work will be required in accordance with The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006. This could also be identified as a hazard under the Housing Health and Safety Rating System (HHSRS), therefore consideration should be given to reconfiguring (some of) the ensuite bathrooms.
- All bathrooms, including en-suite bathrooms, shall have a wash hand basin with minimum dimensions of 560mm x 430mm and either a bath or shower with minimum dimensions of 1700mm x 760mm and 800mm x 800mm, respectively. Units which are undersized will require replacing with appropriately sized units, therefore cloakroom sized basins are not appropriate for bathrooms including en-suites. All wash hand basins and baths/showers must be provided with a constant supply of hot and cold water.
- Although not shown in any detail on the submitted plan, the WC on the ground floor, must have a wash hand basin provided and that has a constant supply of hot and cold water. If the compartment only has a WC in it, a cloakroom basin is adequate.
- All bathrooms, including en-suites, must have appropriate heating within the compartment.
- All basins, baths and showers must have appropriate splashbacks provided.
- The head height of the en-suite bathroom for Bedroom 2 above the toilet is between 1.5m and 2m in height and could potentially pose a collision hazard, whereby a user could hit their head on the ceiling.

Heating

- All bedrooms and communal areas, including hallways and landings, bathrooms (including en-suites), and where considered appropriate, kitchens must be provided with appropriate heating, as per Arun District Council's HMO Standards.

Kitchen Facilities

- All kitchens must meet the Council's HMO Standards in terms of provision of facilities, including, but not limited to:
 - One sink for up to five occupants and then one per four occupants. A dishwasher may be considered as an alternative for up to a maximum of 9 persons. In the proposed application there is only one sink provided in the kitchen and so an additional sink will be required. (It is acknowledged there is a sink in the utility room, but this is a separate room and would not count towards the provision for the kitchen).
 - One cooking appliance (4-ring hob and oven) provided for up to five occupants and then one per four occupants. A combination microwave oven may be considered as an alternative for up to a maximum of 9 persons.
 - All sinks and cooking areas must have appropriate splashbacks provided.
 - An appropriate number of refrigerators and freezers for the number of persons must be provided.
 - Worktops/food preparation tops must be provided at a rate of 500mm long x 600mm depth per occupant.
 - A minimum of three double electrical sockets above the worktop/food preparation top is required for up to 5 persons. For each additional two persons an extra double socket above the worktop height is required. This is in addition to dedicated sockets for white goods, etc.
 - Appropriate cupboard space for the number of occupants is required.
 - Appropriate refuse and recycling disposal is required in the kitchen (as well as refuse receptacles externally for the weekly/bi-weekly collection).
 - Mechanical extract ventilation to the outside air is required in all kitchens.
 - All sinks must be provided with a constant supply of hot and cold water.
 - There should be appropriate provision of dining facilities for the number of occupants.
- On the submitted plans, the two hobs indicated are very close together. If they are located too close, it may not be possible to fully utilise all rings at once as doing so could result in having to reach over other hot rings. The two hobs should be suitably spaced to allow for use of all rings at once but without having to reach directly over other rings.

Electrical sockets

- All bedrooms must be provided with a minimum of three double electrical sockets.

- All dining rooms and lounges must be provided with a minimum of three double electrical sockets.
- All hallways and landings must be provided with a minimum of a single electrical socket.
- In kitchens, a minimum of three double electrical sockets above the worktop/food preparation top is required for up to 5 persons. For each additional two persons an extra double socket above the worktop height is required. This is in addition to dedicated sockets for white goods, etc.

Ventilation

- Kitchens and bathrooms/shower rooms/ensuites must have adequate mechanical extraction, regardless of any windows present.
- The windows to bedrooms 1,2 and 8 appear small and should be equivalent to 1/20th of the floor area. Windows should provide a reasonable view as well as adequate ventilation, to this end, some Velux-type windows will not be appropriate.

Gas Safety

- All rooms that contain a fuel-burning appliance (except cookers) must contain a Carbon Monoxide (CO) detector.

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 Arun District Council's Houses in Multiple Occupation Standards.
- Must meet the requirements of The Management of Houses in Multiple Occupation (England) Regulations 2006
- Must meet the requirements of The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 (as amended).
- Must meet the requirements of any other associated Housing and/or Houses in Multiple Occupation legislation or regulations if applicable to the property/site.

You should also be aware that the assessment at this time does not prevent the Council from taking future enforcement action in relation to any hazards identified now or at a future date, including once any construction or conversion has taken place, or with changes in National and Local legislation, guidance or Standards. This also should not be taken that an HMO Licence will necessarily be issued based on the Planning application details or above information, and the above is not an exhaustive list of requirements.

No grant of Planning or Building Regulations approval is inferred or implied.

Kind regards

Private Sector Housing & Public Health



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

Sent: 10 October 2024 09:49

Subject: Planning Consultation on: BR/180/24/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/180/24/PL

Registered: 8th October 2024

Site Address: Winslade Court 10 Cavendish Road Bognor Regis PO21 2JW

Grid Reference: 493151 99069

Description of Works: Change of use from 8 bedroom House in Multiple Occupation (HMO) to 11 bedroom HMO. This application is in CIL zone 4 and is CIL liable.

The Council have received the above application.

[Click here to view the application details](#)

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for on site mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used

for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 14th November 2024 . 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://aciplanninginspectorate.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

Hannah Kersley

Planning Officer- Arun District Council

Telephone: 01903 737856

Email: hannah.kersley@arun.gov.uk

PLCONSULT (008) 2020