

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Daniel Carpenter [REDACTED]
Sent: 31 March 2025 12:14
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning consultation on: BR/249/24/PL

Dear Planning

Please see Private Sector Housing comments below. 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 which includes all floors and landings should provide 30 minutes fire resistance, including any service cupboards and understairs areas, and 30-minute fire resisting and self-closing fire doors (FD30S) with an overhead self-closing device, intumescent strip, and/or smoke seals, three hinges, and internal thumb turn latches must be fitted to each bedroom and kitchen. Doors to any service cupboards and understairs areas must also be 30 minute fire-resisting and kept shut with a lock and appropriate signage.
- A mixed Grade A LD2 and Grade D fire alarm system must be installed and maintained. Grade A detection comprises electrically operated smoke and heat detectors which are linked to a control panel. The control panel must conform to current BS 5839: Part 4 or equivalent and incorporate manual call points next to final exits and on each landing. Grade D detection comprises of a mains or battery operated non-interlinked (not linked to the fire panel) smoke detector within in any bedroom.

Grade A detection is required in the following areas:

- Throughout the escape route (smoke)
- All bedrooms (smoke)
- Kitchen diner (heat)

Grade D detection is required in the following areas:

- All bedrooms (smoke, non-interlinked)
- A Fire blanket must be provided in the kitchen
- Thumb turn latches must be fitted to the internal side of all final exit doors.

Emergency lighting

Emergency lighting will be required to the internal escape route due to the size of the building and length of the escape route. Emergency escape lighting must be designed to comply with BS 5266, and it will automatically illuminate upon the failure of the power supply to the conventional artificial lighting, when it must,

- Illuminate the escape route to assist the occupants to move easily to exits and a place of safety;
- Highlight any hazards such as stairs and changes in floor level or direction; and
- Enable easy identification of any fire alarm call points

Room Sizes

- Room sizes must meet national and local standards for houses in multiple occupation, including sufficient useable space, and any rooms which may have sloped ceilings under 1.5m(H) would be discounted in the room size total, normally found within bedrooms where roof extensions have been carried out. The minimum floor to ceiling height is 2.14m, except where part of the ceiling slopes and then it should be a minimum of 2.14m over an area of the floor not less than 50% of the area of the room, measured on a plane of 1.5m above the floor.

Licensing

- Any HMO that has five or more occupants will require a Mandatory HMO licence from the Council and the property must meet minimum standards. This property falls within an additional licencing area so the HMO criteria would apply from three or more occupants.

Ventilation

- Kitchens and bathrooms/shower rooms/ensuites should have adequate mechanical extraction, regardless of any windows.

Kitchen facilities

- The proposed plan identifies one shared double sink and a single drainer in the kitchen, for the kitchen to meet the required standard two sinks with their own drainers will need to be provided, or provision of a dishwasher.
- Accessible worksurfaces within the kitchen should be adequate for the number of occupiers living at the residence with a minimum size of 500mm(L) x 600mm(D) per user. Adequate storage space must also be provided which should be no less than 1 x 500mm(W) x 600mm(D) x 870mm(H) fixed floor unit, OR 1 x 1000mm(W) x 300mm(D) x 720mm(H) per user.

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

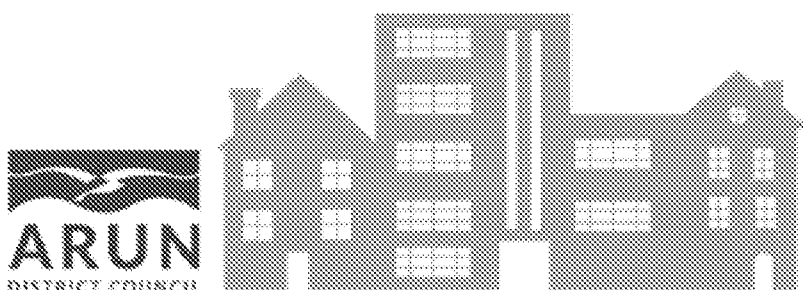
The assessment at this time does not prevent the Council from taking future enforcement action in relation to any hazards identified now or at a future date, including once any construction or conversion has taken place or with changes in National and Local legislation, guidance or standards.

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

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



Our priorities...

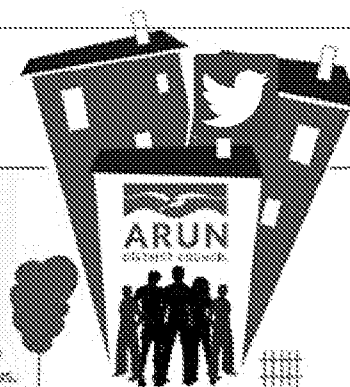
 Improving the wellbeing of Arun	 Delivering the right homes in the right places	 Supporting our environment to support us	 Fulfilling Arun's economic potential	 ARUN DISTRICT COUNCIL
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**It is a criminal
offence to operate
a licensable HMO
without a licence**

Landlords must apply for a mandatory HMO licence if their property is occupied by five or more people in two or more households regardless of the number of storeys.

If you own/manage a house in multiple occupation subject to the new legislation and require more information please visit www.arun.gov.uk/hmo

If you suspect an HMO is operating without a licence, or are concerned about the standards of an HMO, please contact us.



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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.