

[REDACTED]

From: Charlotte Grant [REDACTED]
Sent: 14 March 2019 17:28
To: Simon Davis [REDACTED]
Cc: Daniel Stroud [REDACTED]
Subject: Re: BR/270/18/PL - 18-20 London Road, Bognor Regis, PO21 1PY
Importance: High

Dear Simon

Thank you for your message. I am available tomorrow afternoon so hopefully we can speak then. In the meantime, Daniel has helpfully provided some additional commentary I response to your queries which should address the queries raised by the EHO. The responses are as follows:

Fire Safety:

The designs have been developed to satisfy the standards required for simultaneous evacuation. This has been undertaken with Salus AI, who are a respected approved inspector. Further detail will of course be part of the design development towards building regulations approval.

Room sizes:

All room sizes are in excess of the minimum requirements as set out for HMOs, based on the 'accommodation with facilities shared by occupiers' scenario (standards cited are attached)

- Non-ensuite rooms are generally a minimum of 11.6m^2 and ensuite bedrooms are 14.5m^2 (12.3m^2 plus ensuite).
- Kitchens: 3 person KLD = minimum 21.8m^2 (HMO = 13.5m^2); 4 person KLD = minimum 27.5m^2 (HMO = 17m^2); 5 person KLD = minimum 27.8m^2 (HMO = 18m^2); 6 person KLD = minimum 28.1m^2 (HMO = 20m^2)

Licencing:

As above, the accommodation is designed in excess of HMO minimum standards

Ventilation:

All bathrooms and kitchens are ventilated through a hotel style central low velocity zonal supply and extract system incorporating heating and heat recovery. The sustainability and energy report is attached but I'm not sure that we would want to be issuing it – it would require updating to include the store level accommodation.

Refuse:

In the event of a break down of the student accommodation lift, the bins can be taken to ground floor level (by arrangement/agreement) using the Wilko goods lift which is on the same floor as the bin store.

I have also given further consideration to the issue of first floor waste collection and the implications of this associated with an alternative HMO use in the long term, Council tax, and the obligation upon the Council to provide a refuse collection service for Council tax payers. In short, Councils are obliged to collect refuse from properties that attract Council tax. However, they are not necessarily obliged to do it themselves and many Councils use private contractors. S106 (1) (d) of the T&CPA 1990 allows the Council to require "a sum or sums to be paid to the authority... on a specified date or dates or periodically". Therefore we believe that there is no reason in principle why the Council could not require and receive under a S106 Agreement, whatever sums were necessary to enable them to collect rubbish from the first floor, if this was required by an HMO user in the future. The sums could be indexed to the actual cost incurred by the Council to meet its duty to collect the waste.

In light of the above, I would very much welcome your thoughts as to how we may secure a position which gives my client additional flexibility regarding the long term use of the building.

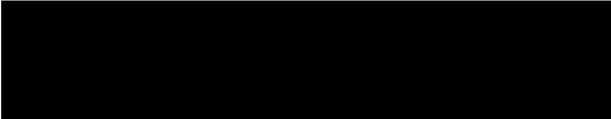
I look forward to hearing from you.

Kind regards
Charlotte

Charlotte J Grant BSc (Hons) MSc MRTPI
Director

Harwood Savin Ltd
Town Planning Consultants

Wyvols Court | Swallowfield | Reading | RG7 1WY



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On 14 Mar 2019, at 17:03, Simon Davis <Simon.Davis@arun.gov.uk> wrote:

Hi Charlotte,

I did get your call yesterday but I ran out of time to ring you before I had to leave. I work at home on Thursdays without phone access. I have a stack of messages to return tomorrow and you are at the top of the list. It will probably be in the afternoon.

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |

Location: Planning, First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF

Internal: 37874 | External: +44 (0) 1903 737874 | E-mail: simon.davis@arun.gov.uk

Please note that I typically work from home on Thursdays when I am unreachable on my work phone

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From: Charlotte Grant [REDACTED]
Sent: 14 March 2019 16:45
To: Simon Davis [REDACTED]
Subject: Re: BR/270/18/PL - 18-20 London Road, Bognor Regis, PO21 1PY

Dear Simon

I tried to call you yesterday afternoon but you were away from your desk. Please could you give me a call or [REDACTED] when you have a moment so we can in particular, discuss the refuse issue.

Many thanks and kind regards
Charlotte

Charlotte J Grant BSc (Hons) MSc MRTPI
Director

<image001.jpg>

Wyvols Court | Swallowfield | Reading | RG7 1WY
[REDACTED]

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On 13 Mar 2019, at 11:36, Simon Davis [REDACTED] wrote:

Dear Charlotte,

Please see below Env Health (HMO Officer) response. We will have to take this into account when we decide whether or not to impose a student only condition.

Kind Regards

Simon J Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |
Location: Planning, First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
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From: Louise Crane
Sent: 01 March 2019 10:32
To: Simon Davis <Simon.Davis@arun.gov.uk>
Subject: RE: BR/270/18/PL - 18-20 London Road, Bognor Regis, PO21 1PY

Hi Simon

My apologies for not coming back to you sooner, I have reviewed the application and would make the following comments:

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”

Room Sizes

- Room sizes should meet the minimum standards for houses in multiple occupation as the flats are intended to be rented, these standards can be found on the Council's website <https://www.arun.gov.uk/hmo>

Licensing

- Any property that has 5 or more people sharing facilities will require a license from the Council and the property must meet minimum standards.

Ventilation

- Any bathrooms/ensuites without windows for natural ventilation should have adequate mechanical ventilation.

Refuse

- There is provision for a refuse store which is located on the first floor and collection by the refuse company is internally utilising the lift. I have concerns regarding this arrangement as to whether a refuse company would operate this collection service, if the lift is out of action what are the arrangements, will the same lift be used by the residents, if the residents are requested to put the refuse outside for collection then this could be a considerable amount of waste put on the pavement/roadside for collection which will lead to complaints. Bin stores need to be appropriately managed particularly with this type of internal arrangement to ensure they are cleaned, maintained and do not allow build of waste to help prevent any potential public health issues. I note that the management plan is to have a live in student warden, however, this may not always be the case if the situation should change or new ownership took over the property.

Should you require any further information or clarification just let me know.

Kind regards

Louise

Louise Crane | Principal Environmental Health Officer, Private Sector Housing & Public Health, Arun District Council | Location: Third Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
Internal: 37669 | External: +44 (0) 1903 737669 | E-mail: louise.crane@arun.gov.uk

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From: Simon Davis

Sent: 11 February 2019 14:53

To: Louise Crane

Subject: BR/270/18/PL - 18-20 London Road, Bognor Regis, PO21 1PY

Hi Louise,

Re BR/270/18/PL – “Part conversion & extension of existing building to provide 6 No. additional storeys over existing rooftop to provide up to 104 No. student residential units with access from Bedford Street, associated servicing & ancillary accommodation, entrance & new internal stairs to existing building to provide access from Bedford Street.”

We have had EH comments on this application (as below email) but I wondered whether your team had any comments from a HMO point of view. The reason I ask is that although this is student accommodation, if we don't restrict it by condition to students, then it could end up being used by Butlins staff or as another kind of HMO. I would be particularly interested in your thoughts as to how the proposed internal bin store would work if it did become a HMO. I have spoken to Dan Cox and he would not want to have to collect waste from the premises if it did become a HMO (he would not have to if students as hall of residence are exempt from Council Tax).

Cheers

Simon J.Davis MRTPI | Principal Planning Officer, Planning Department, Directorate of Place, Arun District Council |
Location: Planning, First Floor, Arun Civic Centre, Maltravers Road, Littlehampton, BN17 5LF
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