



Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF

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**From:** Martin Hill <Martin.Hill@arun.gov.uk>  
**Sent:** 19 April 2022 11:40  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Subject:** RE: Planning Consultation on: BR/48/22/PL

Dear Planning

Comments from Private Sector Housing:

### **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”
- 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. The escape route from the bedroom in Flat 2 is via the kitchen and living area, which is a high risk room. This can be overcome by separating the kitchen and living space from other parts of the flat with an access hall serving the flat entrance and partitioning off the kitchen and living area; in the same way as is proposed for flat 1, with an access door off the hallway to each available room.

- The escape route must provide for a minimum 30min fire resisting escape route, which would include providing a 30 minute fire resisting and self-closing fire door to the entrance of each flat and any other risk areas in the building along the escape route. The fire doors must meet the FD30S standard and include 3 fire rated hinges, intumescent strips and cold smoke seals, an overhead self-closing device and a Yale-type thumb-turn device to enable escape without the need for a key, code or card.
- There must be a minimum 30 minutes fire separation between each flat, both vertically and horizontally.
- It is noted that there is a Study identifiable on the proposed plan on the second floor landing. A study or any combustible items or sources of ignition must not be located in this area, which serves as an emergency escape route. This may be a typo and perhaps intended to show a skylight?
- Emergency lighting conforming to BS5266 to be installed throughout the internal escape route and externally where there is no borrowed lighting available to illuminate the route to a place of ultimate safety.
- The fire alarm and detection system must be upgraded, if not already present and must be a mixed grade system of Grade A, LD2 (BS5839-1) serving common areas and the protection of PLUS a Grade D LD3 (BS5839-6) system to be installed within each flat, serving each flat on it's own (i.e. not interlinked with the Grade A system):

Grade A, LD2 fire alarm and detection system,

- interlinked mains wired smoke alarms with central battery back-up located throughout the escape route on each storey and in any communal risk areas, such as understairs areas or service cupboards.
- Interlinked heat alarms with central battery back-up located in the entrance lobby/hall within each flat.

## **PLUS**

Grade D, LD3 fire alarm and detection system consisting of:

- interlinked mains wired smoke alarms with integral battery back-up located throughout the escape route within each flat.
- It is recommended to install interlinked heat alarms with integral battery back-up in each kitchen
- Fire blankets to be provided in any shared kitchens

## **Room Sizes**

- Room sizes should meet the minimum standards for houses in multiple occupation if the flats are intended to be rented.
- The floor to ceiling height must be at least 2.1 metres from floor to ceiling over at least 50% of the floor area when measured at a height of 1.5metres from the floor and provide sufficient useable space.
- Note with regards to room sizes:

6.51sqm – suitable for 1 person  
10.2sqm - suitable for 2 persons

- Note with regards to children and how they fit into room size calculations:  
Babies up to the age of 1 are discounted  
Children aged 1 -10 years are classed as half a person  
Children aged over 10 years are classed as a person

## **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.
- If the residents are to be responsible for their own cooking then the kitchen must be equipped with the following equipment, which must be fit for the purpose and supplied in a sufficient quantity for the number of those sharing the facilities
  - o sinks with draining boards;
  - o an adequate supply of cold and constant hot water to each sink supplied;
  - o installations or equipment for the cooking of food;
  - o electrical sockets;
  - o worktops for the preparation of food
  - o cupboards for the storage of food or kitchen and cooking utensils;
  - o refrigerators with an adequate freezer compartment (or, where the freezer compartment is not adequate, adequate separate freezers);
  - o appropriate refuse disposal facilities; and
  - o appropriate extractor fans, fire blankets and fire doors.

## **Ventilation**

- Any bathrooms and kitchens without windows for natural ventilation should have adequate mechanical ventilation. Mechanical extraction should be installed in the kitchen area of Flat 2 due to the location of the only available window being in the living area, rather than near to the cooking facility.
- All habitable rooms must have an opening window, equivalent to 1/20<sup>th</sup> of the floor area, to the outside air to provide adequate ventilation. French or patio doors that have no separate openable casements, or where there is no alternative openable casement within the room, are not considered acceptable in bedrooms.

If skylights/roof casements are the only source of light and/or ventilation within a habitable room, they must meet all of the following requirements;

- o The skylight/roof casement must be able to be fully opened for ventilation during spells of prolonged and heavy rain or snow without allowing it to enter the room;
- o The skylight/roof casement must have integral passive ventilation for ventilation even when the window is shut; and
- o The skylight/roof casement must provide a reasonable view for the occupant(s). The Housing Health and Safety Rating System (HHSRS) states as a relevant matter that there should be a “reasonable view out of all rooms, other than those where privacy is required, such as bathrooms and WCs”, as this can have a negative effect on the mental health of the occupants, especially over the longer-term

## **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 the Arun District Council Houses in Multiple Occupation Standards (2020);
- Must meet the requirements of any other associated Housing and/or Houses in Multiple Occupation legislation or regulations if applicable to the property/site;
- Must meet the requirements of The Licensing and Management of Houses in Multiple Occupation and other Houses (Miscellaneous Provisions) (England) Regulations 2006 (as amended);

No grant of Planning or Building Regulations is inferred or implied and it should be noted that the Housing Standards, including room sizes and facilities must be complied with. In cases where it is found that Housing Standards have not been met, this may result in enforcement action being taken by the Private Sector Housing department.

Kind regards

**Martin Hill**  
Houses in Multiple Occupation Officer  
Private Sector Housing & Public Health Team

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|--------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--|
| <p><b>It is a criminal offence to operate a licensable HMO without a licence</b></p> | <p>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.</p> <p>If you own/manage a house in multiple occupation subject to the new legislation and require more information please visit <a href="http://www.arun.gov.uk/hmo">www.arun.gov.uk/hmo</a></p> <p>If you suspect an HMO is operating without a licence, or are concerned about the standards of an HMO, please contact us.</p> |  |
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Please note that during the continuing Coronavirus pandemic Officers may be working remotely and there may be limited access to incoming mail, so if possible, please send all correspondence via e-mail. **Please also note that to protect staff and customers from unnecessary potential exposure to Covid-19** any inspections arranged may be subject to change or cancellation at short notice in line with any National, Regional or Council-specific guidelines and requirements, or any newly imposed restrictions. Officers have the discretion to abort a visit if they consider that appropriate precautions are not in place or social distancing cannot be achieved.

**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>  
**Sent:** 11 April 2022 11:18  
**To:** EHPlanningConsultations [REDACTED]  
**Subject:** Planning Consultation on: BR/48/22/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/48/22/PL  
**Registered:** 7th April 2022  
**Site Address:** 13-17 Richmond Avenue Bognor Regis PO21 2YE  
**Grid Reference:** 492499 98986  
**Description of Works:** Conversion of existing loft space into 2 No flats. This application is in CIL Zone 4 (Zero rated) as flats.

The Council have received the above application.

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

Should you have any comments to make, these should be sent by replying to this email by 13th May 2022 . 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://app.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

Mrs A Gardner

Planning Officer- Arun District Council

Telephone: 01903 737529

Email: [Anita.Gardner@arun.gov.uk](mailto:Anita.Gardner@arun.gov.uk)

PLCONSULT (ODS) 2020