

PL- Consultation- Private Sector Housing & Public Health (Environmental Health) response

Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
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From: Christian Melgar <Christian.Melgar@arun.gov.uk>
Sent: 23 April 2026 14:49
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/52/26/PL

Good afternoon

Planning Consultation on BR/52/26/PL

The Private Sector Housing and Public health team make the following comments, observations and requirements in regard to the proposed Change of use from dwelling house (use class C3) to 7-bed, 8-person house in multiple occupation (Sui Generis) to include a rear extension and loft conversion.

There is no objection in principal to the proposal, as long as the following matters are adhered to and any required actions or works to comply with them are suitably addressed/completed. Any deficiencies or hazards found after completion of works may be subject to enforcement action by the Private Sector Housing Team.

These comments are in relation to Houses in Multiple Occupation (HMO) and general housing conditions and have regard to the Housing Act 2004, Housing Health and Safety Rating System (England) Regulations 2005 and national fire safety guidance.

Room Sizes

- All accommodation units must meet minimum room sizes:
 - Single bedroom where there are shared kitchen-diner facilities: minimum 6.52m²
 - Double bedroom where there are shared kitchen-diner facilities: minimum 10.2m²
 - Dining-kitchen room for 8 persons: minimum 16m²
 - All floor to ceiling heights should be at least 2.1m; however, where there are sloped ceiling areas any height below 1.5m from the floor must be discounted from the room size area, and of the remaining space at least 50% must be at a height of at least 2.1m height.

Kitchens

- kitchens must have adequate mechanical extraction to the outside air, regardless of any windows (in accordance with approved document F under the Building Regulations 2010).
- adequate appliances and equipment for the cooking of food - minimum of one appliance with 4 hob rings and an oven for up to five occupants and then 1 appliance with 4 hob rings and an oven per 4 occupants or part thereof. Adequate space surrounding the cooking facilities must be provided to ensure safety. A combination-type microwave oven, capable of roasting as well as microwaving, may be considered as an alternative to a second appliance for up to 9 persons.
- a sink with drainer with an adequate supply of cold and constant hot water for up to five occupants and then 1 sink with drainer with an adequate supply of cold and constant hot water per 4 occupants or part thereof. A full-sized dishwasher may be considered as an alternative to a second sink for up to 9 persons.
- a work top of sufficient size for the preparation of food – a minimum of 600mm x 1000mm per person.
- sufficient electrical sockets – a minimum of three doubles above worktop level for up to 5 persons and an additional double plug socket above worktop level for each additional 2 persons, and additional dedicated sockets for white goods as appropriate (sockets above worktop level should not be used for white goods located below worktop level).
- a single cupboard for the storage of kitchen utensils and crockery and food items per occupant. Floor-based units: 500mm (w) x 600mm (d) x 870mm (h). Wall-based units: 1000mm (w) x 300mm (d) x 720mm (h). Units below sinks are not considered acceptable for food or food utensil storage.

- a refrigerator and freezer (or combined unit) appropriate for the number of occupants.
- Suitable readily-cleansable splashbacks behind sinks and drainers and cooking facilities.

Bathrooms

- All bathrooms/shower rooms and toilets must be of an adequate size and layout and provide adequate drying and dressing space within the compartment itself. Bathrooms measuring less than 2m² are more likely to contain hazards which pose a risk to the users and may be subject to enforcement action
- All wash hand basins, whether in a bathroom/shower room or en-suite bathroom, must be of full size (minimum dimensions 560mm x 430mm) and not just a cloakroom-sized wash hand basin (smaller wash hand basins can be accepted within WC compartments for hand washing only)
- All wash hand basins must be equipped with taps providing an adequate supply of cold and constant hot water
- All bathrooms/shower rooms must be suitably and adequately heated (fixed space heating capable of reaching and maintaining 22°C when the external temperature is -1°C, within one hour of being turned on).
- All bathrooms/shower rooms must be ventilated to the outside air (minimum extraction rate of 15 litres per second), regardless of whether a window is also present.
- Shower cubicle minimum dimensions are 800mm x 800mm
- Bath and shower cubicles and wash hand basin must be provided with adequate splashbacks (300mm to baths and wash hand basins, full heights to all shower cubicles or showers located over baths) with an adequate waterproof seal between the splashbacks and the fitting
- Where no window is present, WC compartments must have adequate mechanical extraction to the outside air.

Fire Safety

Mixed system Grade A, LD2

- A 30-minutes fire separation protected escape route must be provided from all rooms.
- Mains-powered interlinked smoke detectors with integral battery-back-up must be provided in all hallways, landings, dining areas and utility rooms at each level.
- Mains-powered heat detectors with integral battery-back-up linked to the common parts smoke detectors must be provided in the communal kitchen, Bedroom 3 and Bedroom 6.
- Mains-powered non-interlinked smoke detectors with integral battery-back-up must be provided in Bedroom 3 and Bedroom 6.
- Mains-powered interlinked smoke detectors with integral battery-back-up linked to the common parts smoke detectors must be provided in Bedrooms 1, 2, 4, 5 and 7
- Interlinked smoke and heat detectors must be linked to a Fire Alarm Control Panel located in the ground floor hallway.
- Emergency Lighting must be provided in all hallways, landings, dining areas and utility rooms at each level.
- Emergency Fire Alarm Call Points linked to the Fire Alarm Control Panel must be provided in all hallways and landings on each level, and at each final exit door from the building.
- As Bedroom 7 is an inner room and has to pass through the utility room and kitchen-diner as its normal egress route, an emergency escape window must be provided in this room. See below for requirements for escape windows.
- A 'light duty' fire blanket should be provided in kitchens/kitchen areas. Fire blankets should comply with BS EN 1869: 2019 or equivalent. Fire blankets should be mounted on the wall approx. 1.5m high and within a reasonable distance of the cooking appliance but not directly above or behind it.
- A 30-minute fire door must be provided between the dining room and the ground floor hallway. The door must be fitted with an intumescent strip, cold smoke seal, an overhead self-closing device capable of closing the door from any angle, and be hung using three fire-rated hinges.
- A 30-minute fire door must be provided between the kitchen and the ground floor rear bedroom (Bedroom 7). The door must be fitted with an intumescent strip, cold smoke seal, an overhead self-closing device capable of closing the door from any angle, be hung using three fire-rated hinges and have a thumb-turn inner latch.
- A 30-minute fire door(s) must be provided to the ground floor plant room. The door(s) must be fitted with an intumescent strip, cold smoke seal, an overhead self-closing device capable of closing the door from any angle, and be hung using three fire-rated hinges.
- A 30-minute fire door must be provided to Bedroom 3 and Bedroom 6. Doors must be fitted with an intumescent strip, cold smoke seal, an overhead self-closing device capable of closing the door from any angle, be hung using three fire-rated hinges and have a thumb-turn inner latch.
- No cooking facilities must be provided in Bedrooms 1, 2, 4, 5 and 7 unless alterations are made to the fire alarm detection system (i.e. mains-powered interlinked heat detector and non-interlinked mains-powered smoke detector in any room where the change has been made).
- All bedrooms must have a minimum of two suitably located double electrical sockets and lounge/dining areas a minimum of three suitably located double electrical sockets to reduce the likelihood of power sockets being overloaded and eliminate "daisy-chaining" of extension cables which can increase the likelihood of a fire occurring.
- Any consumer units and electrical or gas meter or intake cupboards should provide a minimum of 30-minutes fire-resistance including the doors, and understairs boarded with 30-minute fire-resistant material, where applicable. Depending upon the situation, mains-powered interlinked smoke detection may also be required within individual cupboards which house electric or gas intakes/supplies/consumer units/fuseboards.

Emergency Escape Windows Requirements

Any window provided for emergency escape purposes should have an unobstructed openable area that is at least 0.33m² and have a minimum 450mm height and 450mm width. The bottom of the openable area should not be more than 1,100mm above the floor. Escape windows can only be considered if satisfied that it would be safe to use them in an emergency. They should meet the following criteria:

- 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 with a lockable door (unless of a type that can be overridden from outside the room without the use of a key, tool or numerical code);
- occupiers are able-bodied individuals with no specific high-risk characteristics and 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 use of a removable key; and the ground below is level and free of obstructions; and
- the window or door should lead to a place of ultimate safety, clear of the building. However, if there is no practical way of avoiding escape into a courtyard or back garden from where there is no exit, it should be at least as deep as the building is high.

Heating

- Permanent Fixed and Controllable whole-house space heating provided with controls that allow occupant(s) to regulate the temperature within each individual room must be provided in living rooms, dining rooms, bedrooms, bathrooms and hallways, and where assessed as appropriate, kitchens.
- The heating provided must be capable of maintaining +21°C in living rooms (including bedsits and studio flats), dining rooms and bathrooms and +18°C in bedrooms, hallways, (and kitchens where appropriate) when the external temperature is -1°C, within one hour of being turned on.
- The heating provided must be adequate for the size of room and dwelling, and the output of the heater must reflect the thermal characteristics of the accommodation which will include the method of construction, heat losses through walls and volume of the room. Electric heating installed must be hard-wired and must be installed in accordance with the electrical guidance notes detailed at the end of this document. Regard should be had when

using/installing electric storage heating whether a “boost” function control is required to ensure that the above required temperatures are maintainable throughout the day and night.

- The Council may request that your appointed heating engineer provide full details of the heating calculations to confirm that the heating installed has been correctly sized in order to attain the above specified design temperatures.

Bedroom 6 (Second Floor)

The bedroom is identified as being a double bedsit; however, it also has a part-sloped ceiling and therefore the stated room size of 16.7m² may not be the actual size of the room when any space where the floor to ceiling height is under 1.5m has been subtracted from the overall room size, and therefore below the minimum size required for a 2-person bedsit under the Council's HMO Standards. In addition, the suggested placement of the double bed means that one person has to either climb over the other occupant to get to the side nearest the wall, or the first occupant always has to use one side (the one nearest the wall). It may be more suitable if Bedroom 6 was a single occupancy room and Bedroom 3, which is a larger room anyway (but also has its own cooking facilities and en-suite shower room) and identified as a single bedsit, was used as a double bedsit as it would allow i). more room for two people, and ii). Allow for the occupants to get in both sides of the bed.

General

- The property complies with the most recent Arun District Council HMO Standards at all times.
- Must meet the requirements of the Housing Act 2004, and any related Housing and energy efficiency legislation (for example, MEES), and be free of Category 1 and significant Category 2 Hazards under the Housing Health and Safety Rating System (HHSRS).
- An appropriate number of waste and recycling receptacles for household refuse are provided for the number of occupants occupying the property.
- You should 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 (including pre-existing items that might not previously have been noted or action required). Any deficiencies or hazards found after completion of works may be subject to enforcement action by the Private Sector Housing and Public Health Team.
- No grant of Planning or Building Regulations is inferred or implied

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From: Planning.Responses <Planning.Responses@arun.gov.uk>
Sent: 10 April 2026 09:48
To: EHPlanningConsultations <EHPlanningConsultations@arun.gov.uk>
Subject: Planning Consultation on: BR/52/26/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/52/26/PL
Registered:	9th April 2026
Site Address:	28 Argyle Road Bognor Regis PO21 1DZ
Grid Reference:	493224 99065
Description of Works:	Change of use from dwelling house (use class C3) to 7-bed, 8-person house in multiple occupation (Sui Generis) to include a rear extension and loft conversion. 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 15th May 2026 . 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

Hebe Smith

Planning Officer- Arun District Council

Telephone: 01903 737626

Email: hebe.smith@arun.gov.uk

PLCONSULT (ODB) 2020