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Arun District Council, Civic Centre, Maltravers Rd
Littlehampton, West Sussex, BN17 5LF
www.arun.gov.uk

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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	 Our core foundations	 
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From: Chantelle Bashford [REDACTED]
Sent: 09 March 2026 13:21
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: RE: Planning Consultation on: BR/9/26/PL

Dear Planning

Please see Private Sector Housing comments below. These comments are in relation to general housing conditions and have regard to the Housing Act 2004, 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 service cupboards and understairs areas, and 30-minute fire resisting and self-closing fire doors (FD30S) must be fitted to units 3 & 4.
- It is noted that each unit benefits from fire detection, however a communal fire alarm system may also be required if the conversion does not attain building approval. In this instance, the following communal fire alarm system would be required –

Grade D1, LD2 system:

- interlinked mains-powered **smoke** alarms with integral tamper-proof battery back-up installed to the escape route; and
- interlinked mains-powered **heat** alarm with integral tamper-proof battery back-up within each flat in the room/lobby that opens onto the escape route
- Fire blankets should be provided to all kitchen areas
- All bedrooms within all four units are inner rooms (with the exception of the bedroom at south elevation within unit 4). 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. This can be overcome by providing the following additional fire safety measures:
 - Escape windows installed to the five affected bedrooms to provide an alternative means of escape;
 - FD30S doors fitted to those bedrooms; and
 - Smoke detection installed to the outer rooms to provide early warning (this has been noted on the proposed plans within all units except for unit 3, presumably because this outer room is a kitchen/living room. Smoke detection can likely be installed within the small lobby area immediately outside both bedrooms to avoid false alarms from the kitchen, however it is strongly advised to liaise with a fire alarm engineer for best placement)

An escape window should only be installed if the following criteria can be met:

- 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;
- If it is necessary to pass through the escape route to reach the window, consideration should be had to the travel distance involved;
- Occupiers are able-bodied individuals 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 need for a key and the ground below is level and free of obstructions; and
- The window should lead to a place of ultimate safety. However, if this leads into a courtyard or back garden where there is no exit, it should be at least as deep as the building is high

The escape windows required within unit 3 may not be feasible due to the immediate surroundings. For example, the windows within the bedroom at the west elevation are sited directly above a bay window and the bedroom to the south elevation is directly above a narrow path with a mid-height party wall running between the two properties.

Consideration should be given to reconfiguring the layout of all units to prevent inner rooms, in particular unit 3.

- Conventional (and possibly emergency) lighting to be provided to the external escape route
- Emergency lighting may be required to the internal escape route due to a lack of natural and/or borrowed light

Facilities

- The proposed kitchenettes within units 2 & 3 appear inadequate and are likely to give rise to multiple hazards.

Unit 2 – Measurements have not been provided on the proposed plans however the size of the kitchenette appears on the smaller side with no provision for worktops. In addition, a small space is being created to house the cooker which is likely to result in the user being unable to safely use all the hob plates as pan handles will either have to sit across the hob or extend off the front of the cooker which creates associated hazards with collision and flames and hot surfaces. The location of the cooker and the entrance into the kitchen also poses a risk as someone could collide with the user of the cooker if they were bending to put something in or take something out of the oven. Lastly, the tight space also increases the risk of fire.

Unit 3 – Again, no measurements are provided on the proposed plans but the kitchenette appears to comprise of one piece of worktop with sink and drainer and hob insert, leaving very little provision for worktop space. The small space that appears to be left between the sink and hob is all that is available for small appliances (e.g. kettle, toaster, microwave) as well as food preparation.

Consideration should be given to reconfiguring the kitchenettes within both units.

Ventilation

- Kitchens and bathrooms/shower rooms/ensuites should have adequate mechanical extraction in addition to any windows

Terraces/Balconies

- The balcony within unit 3 must provide a guarding height of 1100mm minimum extending up from the balcony floor with openings that would not allow a sphere with a 100mm diameter to pass through. The guarding should not be constructed so as to facilitate climbing by children

Additional HMO Licensing Scheme – Section 257 HMO

- The Council introduced an Additional HMO Licensing Scheme in February 2025 which requires all 3-4 person HMOs, converted mixed-use buildings and **section 257 HMOs** to have an HMO licence in the Hotham and Marine wards in Bognor Regis and River ward in Littlehampton. As this building falls within one of the affected wards, it may require an HMO licence. The building is a section 257 HMO if it fulfils **all** of the following criteria –
 - it is a converted building or part of a converted building; **and**
 - comprises self-contained flats; **and**
 - the conversion work does not comply with 1991 (or subsequent) Building Regulations; **and**
 - less than two-thirds of the flats are owner-occupied (that is a leaseholder lives in their flat with a lease granted for a term of more than 21 years)

If all of the above criteria is fulfilled a section 257 HMO licence will be required.

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 any other associated Housing and/or Houses in Multiple Occupation legislation or regulations if applicable to the property/site

Kind regards
Private Sector Housing & Public Health

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www.arun.gov.uk



Arun Additional HMO Licensing Scheme 2025

www.arun.gov.uk/hmo
HMOLicensing@arun.gov.uk

Please note that officers may be wearing body-worn cameras during all types of site visits and inspections. They are used to capture both video and audio evidence when officers are attending for evidential purposes and to assist in enforcement matters.

In addition, personal safety of visiting officers is important to the Council, and we ask that you are respectful to them during inspections and visits whilst they undertake the functions of their job.

Verbal and physical abuse or threats will not be tolerated and footage obtained by body-worn devices may be used as evidence in any action taken against an individual or individuals.



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

Sent: 11 February 2026 11:34

Subject: Planning Consultation on: BR/9/26/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/9/26/PL
Registered: 28th January 2026
Site Address: Jubilee Guest House 5 Gloucester Road Bognor Regis PO21 1NU
Grid Reference: 494101 99090
Description of Works: Change of use from Guest House to 4 No self contained apartments. This application is in CIL Zone 4 (Zero Rated) as flats.

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 12th March 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

Amber Willard

Planning Officer- Arun District Council

Telephone: 01903 737942

Email: amber.willard@arun.gov.uk

PLCONSULT (ODB) 2020