







Arun Private Sector Housing response

Arun District Council, Civic Centre, Maltravers Rd  
Littlehampton, West Sussex, BN17 5LF  
[www.arun.gov.uk](http://www.arun.gov.uk)

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**Our priorities...**

 <p>Improving the wellbeing of Arun</p>	 <p>Delivering the right homes in the right places</p>	 <p>Supporting our environment to support us</p>	 <p>Fulfilling Arun's economic potential</p>	 
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**From:** Daniel Carpenter <Daniel.Carpenter@arun.gov.uk>  
**Sent:** 22 September 2025 12:01  
**To:** Planning.Responses <Planning.Responses@arun.gov.uk>  
**Subject:** Planning consultation on: FP/132/25/PL

Dear Planning,

Please see Private Sector Housing comments below. These comments are in relation to Housing Health and Safety Rating System (England) Regulations 2005 and have regard to the Housing Act 2004, 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”.

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- The internal escape routes 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.
- A Grade D LD3 fire alarm system must be installed and maintained. Grade D detection comprises a system of one or more mains-powered smoke (or heat) alarms each with integral battery standby supply. These are designed to operate in the event of mains failure and therefore could be connected to the local lighting circuit rather than an independent circuit at the dwelling’s main distribution board. Grade D LD3 detection is a system incorporating detectors in circulation spaces that form part of the escape routes from the dwelling only. However consideration should also be taken for installation of a Grade D heat detector located in each kitchen.

Grade D detection is required in the following areas:

- Any hallways/landings/loft rooms (smoke, interlinked)
- Any kitchens (heat, interlinked)
- A Fire blanket should be provided in the kitchens
- Thumb turn latches must be fitted to the internal side of all final exit doors.

## **Escape windows**

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

## Windows

- Opening limiters should be installed to all windows above the ground floor to prevent windows being opened more than 100mm. Opening limiters should not be key operated
- The roof casements serving the loft storage room should be of an appropriate height and angle to provide a reasonable view outside of the immediate surroundings

## Ventilation

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

## 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

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.

Kind regards,

Private Sector Housing & Public Health

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**Arun Additional HMO Licensing Scheme 2024**  
<http://www.arun.gov.uk/HMO>



## 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



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](http://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.