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Arun District Council, Civic Centre, Maltravers Rd, Littlehampton, West Sussex, BN17 5LF
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From: Chantelle Bashford <Chantelle.Bashford@arun.gov.uk>

Sent: 29 June 2021 13:04

To: Anita Gardner <Anita.Gardner@arun.gov.uk>

Cc: Carol Reynolds <Carol.Reynolds@arun.gov.uk>

Subject: LU/116/21/PL

Dear Anita,

Please see Private Sector Housing comments below concerning the proposed block of flats only. 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”
- 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. All of the proposed flats consist of inner rooms (in this instance, all the bedrooms) where egress is via the open plan living room kitchen, with the exit being nearest to the kitchen. Due to the proposed layout of the flats, an alternative exit/secondary means of escape will be required which is likely to cause difficulties with the flats located on the second and third floors.

Ground and first floor flats

An escape window can be installed to each bedroom which will provide an alternative means of escape in the event of a fire. 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

In addition to an escape window, the relevant fire authority may also consider it necessary to install FD30S fire doors to each bedroom and additional interlinked detection to provide the sleeping occupant(s) with early warning of a fire.

Second and third floor flats

As these storeys are likely to be in excess of 4.5m from the ground, an escape window cannot be installed to the flats, therefore an alternative means of escape is required. If the proposed internal layouts are to stay as they are, I am of the opinion this could only be achieved by installing an external fire escape with each bedroom having direct access to it, as the outer room (open plan living room kitchen) is a high-risk room. Additional FD30S doors and interlinked detection may also be required to the bedrooms as mentioned above.

Alternatively, the internal layouts of the flats could be re-configured to remove the inner rooms. This would be the preferred option as inner rooms should be avoided where possible. This could be achieved by providing an entrance hallway with the rooms leading

off it, but consideration would need to be given to the impact this would have on the reduction of the room sizes.

- Flats 12 & 13 to the first floor may require 60 minutes compartmentation between bedroom 1 and the service and storage rooms located directly beneath them on the ground floor, should these ground floor rooms be considered to present a higher fire risk. For example, if the services or storage room were to house any electrics, fuses, meters and so on.
- The internal escape route should provide 30 minutes fire resistance, including the provision of 30-minute fire resisting and self-closing fire doors (FD30S) to the staircase, to each bedroom, the cleaner's store (if a source of ignition is present) and to the rear of the building.
- All final exit doors, including flat entrances, should be openable from the inside without the need for a key; for example thumb turn locks, push bars.
- A mixed Grade A, LD2 and Grade D1, LD3 fire system should be maintained and installed

Grade A, LD2 system:

- Interlinked detection throughout the escape route
- Interlinked detection to the cleaner's store (if a source of ignition is present)
- Interlinked detection to the services and storage rooms on the ground floor (if a source of ignition is present)
- Interlinked heat detection to each flat

Grade D1, LD3 system:

- Mains-wired smoke alarm with integral tamper-proof battery back-up to each flat
- Mains-wired smoke alarm with integral tamper-proof battery back-up to each inner room

N.B. The mains-wired alarms should be interlinked with each other to provide early warning to the sleeping occupant(s)

- Fire blankets should be provided to all kitchen areas
- Emergency lighting will be required to the internal escape route

Ventilation

- 50% of the flats appear to only have a balcony door as the only means of ventilation to the open plan living room kitchen. A separate window casement should be installed and provide a minimum openable area equivalent to 1/20th of the total floor area. The current balcony door design could be reconfigured to include an openable window casement, alternatively there does appear to be scope to install a window casement to the external wall where the television is proposed to be located
- Kitchens should have adequate mechanical ventilation
- Mechanical extraction should be provided to all bathrooms/shower rooms/en suites, especially in this instance where there are no externally opening windows available

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

Terraces/Balconies

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

General

- Must meet the requirements of the Housing Act 2004 and be free of Category 1 and significant Category 2 Hazards

Kind regards,

Private Sector Housing & Public Health Team



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