

**From:** Chantelle Bashford <Chantelle.Bashford@arun.gov.uk>

**Sent:** 20 May 2021 17:23

**To:** Planning.Responses <Planning.Responses@arun.gov.uk>

**Subject:** RE: Planning Consultation on: LU/145/21/PL

Dear Planning,

Please see comments below from Private Sector Housing concerning the change of use from a dwelling house to a 9-bed HMO.

Unfortunately, the proposed plans do not meet Arun's HMO Standards for the following reasons:

- Assuming the bedrooms are intended for single-occupancy use, the shared kitchen is too small for 9 occupants as it must be a minimum size of 13m<sup>2</sup>. N.B. This measurement is based on the kitchen being used for cooking only with separate communal dining facilities elsewhere, as proposed in the plan. However, if the kitchen is to increase in size, this will result in the shared lounge and shared dining room being undersized. One way to overcome this would be to extend the kitchen to create a kitchen/diner. The minimum size required for this, based on 9 occupants, would be 17.5m<sup>2</sup>. N.B. If appropriate communal dining facilities are not provided, either via a kitchen/diner or a separate lounge/diner, the minimum bedroom sizes for single-occupancy will increase to 10.2m<sup>2</sup>, which will result in several bedrooms being undersized.
- The proposed layout of the kitchen does not appear to provide the correct amenities. For example, based on 9 occupants, the following would be required (this is not an exhaustive list):
  - 2x sink and drainer units (a dishwasher could be considered as an alternative to a second sink)
  - 2x ovens with 4 ring hob and grill (a combination microwave oven could be considered as an alternative to a second oven)
  - Minimum 500mm (L) x 600mm (D) worktop per user – smaller lengths less than 500mm cannot be counted towards the overall requirement)

Please refer to Arun's HMO Standards document for the full list of kitchen requirements.

- The ensuite bathrooms to bedrooms 2, 4, 6, 7 and 9 do not appear to be of an adequate size or layout. The bathrooms must be of an appropriate size to provide adequate changing and drying space for the users. The proposed plans show these ensuite bathrooms to be of the same width as the shower tray and with very limited space as the wash hand basins, WC units and shower trays appear to be in close proximity to one another. If a person were to use the ensuite bathroom in bedroom 6, for example, it is likely they would step out of

the shower cubicle and immediately collide with the wash hand basin, as well as colliding with the walls either side of them when attempting to dry themselves or get changed. In addition to not meeting the HMO Standards, this is likely to be identified as a hazard under the Housing Health and Safety Rating System (HHSRS).

### **Other comments:**

#### **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 the provision of 30-minute fire resisting and self-closing fire doors (FD30S) to each bedroom, the shared kitchen and first floor landing, including the cupboard on the landing if there is a source of ignition.
- Grade D1, LD2 fire system to be installed to the property.

Interlinked mains wired smoke alarms with integral tamper-proof battery back-up to be located:

- throughout the escape route
- within each bedroom
- within the shared lounge (if this remains separate)
- to the corridor on the ground floor at the rear of the property
- within the first floor landing cupboard if a source of ignition is present

Interlinked mains wired heat alarms with integral tamper-proof battery back-up to be located:

- within the shared kitchen
- within the shared dining room (if this remains open to the shared kitchen)
- Fire blankets should be provided to all kitchen areas
- If egress from bedroom 4 is via the shared lounge, bedroom 4 will be considered an inner room. The external door within bedroom 4 must be openable without the need for a key, e.g. a thumb turn lock, and lead to a place of ultimate safety.

#### **Room Sizes**

- Room sizes should meet the minimum standards for houses in multiple occupation. These are 6.51m<sup>2</sup> for single-occupancy and 10.2m<sup>2</sup> for double-occupancy where there are appropriate communal dining facilities. If appropriate dining facilities are not provided, the minimum bedroom sizes increase to 10.2m<sup>2</sup> for single-occupancy and 15m<sup>2</sup> for double-occupancy.
- The floor to ceiling height must be at least 2.1 metres over at least 50% of the floor area when measured at a height of 1.5metres from the floor and provide sufficient useable space

#### **Licensing**

- Any property that has 5 or more people sharing facilities will require a licence from the Council.

## Ventilation

- Kitchens will require adequate mechanical ventilation
- Mechanical extraction is required to all bathrooms/shower rooms/en suites

## General

- The ensuite bathroom to bedroom 5 appears to only comprise a shower cubicle. If this is correct, a wash hand basin must also be provided; please refer to Arun's HMO Standards for the minimum size requirement for wash hand basins. It is also assumed that the separate WC compartment located on the ground floor will be for the sole use of bedroom 5.
- It is not clear if the entrance door to bedroom 4 is via the shared lounge. If this is not an access door between the two rooms and bedroom 4 is to come and go via the external door only, it is not reasonable to expect the occupant to exit the building and re-enter elsewhere in order to use the communal facilities.
- 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 The Management of Houses in Multiple Occupation (England) Regulations 2006
- 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)

Kind regards,  
Chantelle

**Chantelle Bashford**  
Houses in Multiple Occupation Officer  
Private Sector Housing & Public Health Team

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**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.



Please note that during the continuing Coronavirus pandemic and with National and regional restrictions in place including working remotely 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 the team has suspended site visits and inspections at the current time except in urgent emergency situations (as assessed by the case officer) and these will only be undertaken where appropriate precautions are in place and social-distancing can be achieved.** 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 and Officers have the discretion to abort a visit if they consider that appropriate precautions are not in place or social distancing cannot be achieved.

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**From:** Planning.Responses <[Planning.Responses@arun.gov.uk](mailto:Planning.Responses@arun.gov.uk)>

**Sent:** 05 May 2021 10:43

**To:** EHPlanningConsultations <[EHPlanningConsultations@arun.gov.uk](mailto:EHPlanningConsultations@arun.gov.uk)>

**Subject:** Planning Consultation on: LU/145/21/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:** LU/145/21/PL

**Registered:** 5th May 2021

**Site Address:** 12 Cornwall Road Littlehampton BN17 6EE

**Grid Reference:** 502760 102560

**Description of Works:** Change of use from (C3) Dwelling house to 9 bed House in Multiple Occupation (Sui Generis)

The Council have received the above application.

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

This application has been identified as CIL Liable. Therefore please be aware that, in accordance with Appendix 2 of the Arun CIL Charging Schedule, your consultation response should only include requests for Section 106 for on site mitigation, Pagham Harbour Management Contributions (if applicable) or Affordable Housing. "Off" Site mitigation measures directly related to this development should be dealt with by condition if possible to ensure the scaling back of Section 106 if possible. CIL contributions will be used for "off" site infrastructure mitigation schemes. Therefore if this proposal triggers the need for "off" site mitigation, please ensure that you engage in the CIL Infrastructure List Consultation process upon receipt of a consultation letter.

Should you have any comments to make, these should be sent by replying to this email by 4th June 2021 . You can also monitor the progress of this application through the Council web site:

[www.arun.gov.uk/planning](http://www.arun.gov.uk/planning).

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 the leaflet how to respond to planning applications <https://www.arun.gov.uk/planning-application-comments> which deals with material planning considerations.

**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://www.planningportal.co.uk/info/200207/appeals> 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

Jasmine Kaur Singh

Planning Officer- Arun District Council

Telephone: 01903 737773

Email: [Jasmine.kaursingh@arun.gov.uk](mailto:Jasmine.kaursingh@arun.gov.uk)

PLCONSULT (ODS) 2020