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From: Elaine Walby on behalf of Planning.Responses
Sent: 06 August 2026 13:59
To: Planning Scanning
Subject: FW: Planning consultation on: M/40/26/PL

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Arun District Council, Civic Centre, Maltravers Rd
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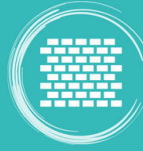
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From: Daniel Carpenter <Daniel.Carpenter@arun.gov.uk>
Sent: 04 August 2026 11:29
To: Planning.Responses <Planning.Responses@arun.gov.uk>
Subject: Planning consultation on: M/40/26/PL

Dear Planning,

Please see Private Sector Housing comments below. These comments are in relation to Houses in Multiple Occupation (HMOs) and have regard to the Housing Act 2004, The Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006, The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018, Arun District Council's HMO Standards, 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 routes which includes all floors and landings should provide 30 minutes fire resistance, including any flat entrance doors, service cupboards and understairs areas, any flat entrance doors, service cupboard doors and other doors leading off of the internal communal area must be 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. Doors to any service cupboards and understairs areas must also be 30 minute fire-resisting and kept shut with a lock and appropriate signage.
- A mixed Grade A LD2 and Grade D fire alarm system must be installed and maintained. Grade A detection comprises electrically operated smoke and heat detectors which are linked to a control panel. The control panel must conform to current BS 5839: Part 4 or equivalent and incorporate manual call points next to final exits and on each landing. Grade D detection comprises of a mains-wired with battery back-up (minimum 10-year life span) non-interlinked (not linked to the fire panel) smoke detector.

Grade A detection is required in the following areas:

- Throughout the escape route (smoke)
- All flat entrance lobbies/hallways (heat)
- Any communal boiler/service rooms (smoke)

Grade D detection is required in the following areas:

- All flat entrance lobbies/hallways (smoke, non-interlinked)
- A Fire blanket must be provided in each kitchen
- 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

Ventilation

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

Emergency lighting

Emergency lighting will be required to the internal escape route due to the size of the building and length of the escape route. Emergency escape lighting must be designed to comply with BS 5266, and it will automatically illuminate upon the failure of the power supply to the conventional artificial lighting, when it must,

- Illuminate the escape route to assist the occupants to move easily to exits and a place of safety;
- Highlight any hazards such as stairs and changes in floor level or direction; and
- Enable easy identification of any fire alarm call points

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.

No grant of Planning or Building Regulations is inferred or implied.

Kind regards,

Private Sector Housing & Public Health

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www.arun.gov.uk



Arun Additional HMO Licensing Scheme 2024

<http://www.arun.gov.uk/HMO>

HMOlicensing@arun.gov.uk



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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