From: Jackie.McGahan
Sent: 19 May 2025 17:24
To: Halima.Chowdhury [redacted]
Subject: FW: DC/25/0649- Planning Application Consultation - 78A Trafalgar Road
Importance: High
Dear Halima,

Housing Act 2004, Part 1: Housing Health & Safety Rating System

We acknowledge that this is an Application under Permitted Development, not full planning.

If the application proceeds, the following matters are of relevant concern under the Housing Act 2004, Part 1, Housing Health & Safety Rating System and we would like them raised with the applicant to avoid potential chargeable enforcement action should the property be converted and found to contravene Housing standards.

1. **Fire:**
   Means of Escape from Fire is not protected from the First Floor Bedroom as it is via a high-risk room, ie. the Kitchen and Living room.
   In addition, there appears to be no door to secure fire separation between Ground and First Floor.
   Provide evidence to demonstrate how the means of escape from the First Floor sleeping accommodation would comply with Building Regulations and Housing Act standards.

2. **Space/Head Height/Collision: Attic Bedroom - Restricted head height:**
   The plan shows the First-Floor area as 10.4m^2. However, it is not detailed which area this covers and what the head heights are in this area.
   The roof is pitched, and so usable head heights will be restricted. Further information is required to comment on compliance.

   Advisory Comment: The Council has currently been unable to adopt the National Standards while the District Plan is held, however, these standards (which are applicable under Planning legislation and not directly under Housing law) once adopted require that where the ceiling is sloping, a minimum floor to ceiling height of 2.3m for at least 75% of the gross internal area is required. Furthermore, they state that a single bedroom should have a floor area of at least 7.5m^2 and that it be at least 2.15m wide.

   Housing standards are informed by a number of national standards, some statutory, and some as guidance, and through risk assessment.
   When measuring a habitable room we will seek to discount any area that has a ceiling height of less than 1.5m above the internal floor level. Ideally rooms should have a ceiling height of around 2.3m above the internal floor level, in line with the Technical Housing Standards- Nationally Described Space Standard. For a room to be considered usable then at least 75% of the ceiling area should be at least 1.9m above the internal floor level.
   The minimum (usable) floor area of a 'Single' habitable room under the Housing Act is 6.51m^2.

3. **Total Space:**
   Advisory Comment: The property is undersized when considered against the National Technical Housing Standards.
   The Applicant's stated sum of Ground and First floor areas is 42.4m^2.

The National Technical Housing Standards list the minimal gross internal floor area of 1 bedroom, 2 storey accommodation as 58m^2.
In calculating this the minimum floor to ceiling height to be 2.3m for at least 75% of the Gross Internal Area, (which we have already queried for the Attic).

4. **Natural Light & Ventilation**
   A 'rooflight' is proposed to provide the only natural light and ventilation to the Attic room.
   Rooflights can contribute to potential overheating issues and in addition, unlike a vertical window, they do not afford a view to connect the occupant with the external environment, only the sky.
   The Housing Health and Safety Rating System notes that provision of a view, from a seated position is strongly beneficial for mental wellbeing.
   Given that occupant's privacy in the Ground Floor Living Room appears to be severely compromised, provision of a view from the First Floor accommodation via a dormer would be very beneficial.

5. **Falls on Stairs, and Falls Between Levels:**
   The proposed staircase enters the First Floor Bedroom presenting a risk of falls.
   The safety and pitch of these stairs is questioned.
   Access to the Attic Bedroom to be provided by a fixed staircase, complaint with current Building Regulations for gradient, tread size, rise and guarding etc.
6. **Excess Heating, and Excess Cold:**
   The property is Victorian and appears to have solid walls rather than modern insulated cavities.
   The roof also is slate and potentially uninsulated.
   In its current condition it would likely fail letting requirements of Energy Performance Certification and internal space lost in upgrading to modern standards.
   A scheme of insulation to bring the property up to Building Regulations compliance required and confirmation as to floor space and head heights on completion.

   Ground Floor: Glass: It is not possible to comment on potential issues for natural ventilation, cold, or overheating as there are no drawings illustrating Proposed Elevations.
   Further details required.

7. **Privacy: for the occupants, and Entry by Intruders:**
   There is no view to the rear garden.
   The Ground Floor Living area is open to the public street. The layout affords no privacy to occupants and potentially compromises their security, should they wish to open windows.
   A lack of privacy and security can lead to stress and contribute to psychological conditions.

8. **Asbestos:**
   Previously commented on by my colleague, Lee Money.

Thanks for your consideration.

Kind regards,
Jackie McGahan
Area Environmental Health Officer (Monday - Thursday)