

Objection to Planning Application Reference: **DC/26/0616**

Address: 82 Bedford Road, Horsham, West Sussex RH13 5BH

Proposal: Erection of a single storey rear extension.

Customer's Address: 3 Waterfield Close, Horsham, RH13 5RR

Dear Ms Meg Bayliss,

I wish to comment on the consultation response submitted by Horsham District Council (HDC) Environmental Health (ENVH) and Licensing Department, dated 04/06/26, regarding the proposed fire escape arrangements for the above planning application which concluded that the fire escape route shown on the submitted plans is unsafe and that modifications are required.

1. Overview

Environmental Health has suggested that a separate escape corridor should be provided. However, it is not clear from the consultation response how the revised layout resulting from this alteration would continue to satisfy HDC's published Houses in Multiple Occupation (HMO) Standards. Based on the submitted plans the introduction of such a corridor appears likely to reduce the kitchen/diner below, or very close to, the minimum standard required for a 6-person HMO.

2. Size, Functionality and Amenity of Kitchen/Diner

The response states:

"The safest and preferred means of escape through the house would be via a corridor separate to the kitchen (which would have fire doors), which was on a previous plan, and would still allow the kitchen to be large enough to meet the standard for licensing."

It is unclear from the consultation response whether the function of the room shown on the plans has been fully considered.

Although identified as a kitchen on the drawings, the room is clearly intended to serve as the sole communal space for HMO occupiers and therefore functions as a kitchen/diner. HDC's HMO Standards state that the minimum size for a kitchen/diner serving as the only communal space for 4–6 occupiers is 11.5m². Based on measurements taken from the submitted plans, the remaining floor area following the creation of the proposed escape corridor would be approximately 11.0m², which appears to fall below, or at best be very close to, the published minimum standard.

Whilst the standards allow reduced room sizes in certain circumstances the issue here is not simply floor area but functionality. The room would be required to operate as the kitchen, dining area and sole communal space for up to 6 occupiers. It is not clear from the

consultation response how it has been concluded that the reduced layout would remain adequate for this purpose.

It is also not clear whether the implications of the proposed kitchen/diner being an entirely internal room, with no external windows providing natural light or natural ventilation, have been considered.

Given that this room would be the sole communal space for up to 6 occupiers I would have expected consideration of the amenity implications of this arrangement, particularly as the introduction of a fire escape corridor would further reduce the usability of the space.

I would therefore ask Environmental Health and Licensing to clarify:

- Whether the revised layout incorporating the proposed escape corridor has been assessed against HDC's minimum standards for a kitchen/diner serving as the sole communal space for 6 occupiers;
- Whether the remaining floor area has been measured and assessed against the published minimum standard of 11.5m²;
- On what basis it has been concluded that the reduced layout would remain adequate and compliant with HDC's HMO standards; and
- Whether the absence of natural light and natural ventilation to the sole communal space has been considered as part of the assessment.

3. Roller catches vs. Security

In addition, the response states:

"Both rear ground floor bedrooms must have roller catches on their doors to permit a fast escape in the event of fire."

It is unclear how the recommended roller-catch arrangement would operate alongside the need for occupiers to secure their rooms for privacy and security. Clarification would therefore be welcomed regarding the proposed door specification and how both objectives would be achieved, particularly where the escape route relies upon doors providing direct access from bedrooms to the rear garden.

It is also not clear whether the implications of the proposed fire escape modifications have been assessed against HDC's wider HMO standards or whether the resulting accommodation has been considered as a whole.

For these reasons, I consider that the consultation response raises unresolved issues regarding both the adequacy of the proposed communal accommodation and the practicality of the suggested fire escape arrangements. Until these matters have been fully assessed and clarified it is difficult to conclude that the proposed development would provide an acceptable standard of accommodation for future occupiers or that the amendments suggested by Environmental Health would be compatible with HDC's published HMO standards. I therefore respectfully request that these matters be fully addressed before any decision is made on the application.

The cumulative effect of the suggested modifications also raises a material planning consideration. Whilst the application is presented as a straightforward bedroom extension, the viability of the scheme is dependent on the creation of a functioning 6-person HMO layout. If the changes required to achieve compliance with fire safety and HMO standards materially compromise the usability of the communal accommodation, this calls into question whether the proposed single storey rear extension (already partly built) would result in an acceptable form of residential accommodation in practice. These matters should therefore be considered cumulatively rather than in isolation.

Kind Regards,

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