

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,

Further to my objections dated 27/05/26 and 08/06/26, I provide the following additional comments regarding planning application DC/26/0616 as a result of the applicant submitting revised drawings on 09/06/26. This letter should be read in conjunction with my previous letters.

While Houses in Multiple Occupancy (HMO) licensing and Building Regulations are separate regimes, the intended end use of the development is a material planning consideration. The proposed extension is functionally dependent upon intensification of the property to a 4–6 bedroom HMO and the application must therefore be assessed as a whole on that basis.

In this context, the development still raises significant concerns in relation to residential amenity, internal living conditions, and the adequacy of information provided to assess compliance with relevant policy.

1. Overview

In summary:

- No acoustic assessment has been provided to demonstrate that neighbouring residential amenity would be protected (Policies 24 and 33).
- Internal revised communal accommodation is still of limited functional quality for the intended occupancy level (Policy 32 and HHSRS considerations).
- The fire escape arrangement still presents potential functional conflicts and insufficiently evidenced escape provision.
- The communal kitchen/diner still lacks natural light and ventilation, raising concerns regarding habitability.
- Ceiling heights have not been clearly demonstrated to meet HMO standards.

2. Residential Amenity and Noise Impacts (HDPF Policies 24, 32 and 33)

Policy 33 of the Horsham District Planning Framework (HDPF) requires development to avoid unacceptable harm to the amenity of neighbouring occupiers. Policy 32 requires development to provide a functional internal environment. Policy 24 requires adequate mitigation of noise impacts on sensitive receptors.

The submitted plans indicate that 2 of the ensuite bathrooms, kitchen facilities, drainage infrastructure and mechanical extract ventilation are located on or immediately adjacent to

the party wall with the adjoining dwelling (No. 80 Bedford Road) next to bedrooms and living spaces.

No acoustic assessment or mitigation strategy has been submitted. As such, there is no evidence to demonstrate that:

- airborne sound transmission through the party wall,
- flanking transmission through floors and junctions,
- structure-borne noise from plumbing and drainage,
- vibration/noise from mechanical ventilation systems,

can be adequately controlled within the context of Edwardian terrace construction which is widely recognised as being more susceptible to sound transmission than modern construction.

Given the proposed intensification to an HMO, the absence of acoustic evidence is a material omission. It has not been demonstrated that the development would avoid unacceptable harm to neighbouring residential amenity which is contrary to Policies 24, 32 and 33.

3. Internal Living Conditions – Communal Amenity and Functionality (Policy 32 and HHSRS considerations)

The proposal provides a single communal kitchen/diner which, following revisions to accommodate a fire escape corridor, is reduced in size to 11.43m² which is now below HDC's HMO Standards.

This raises concerns regarding functional adequacy for 4–6 unrelated occupants. In particular:

- The space is constrained for simultaneous cooking, dining and circulation.
- Seating for 5 occupants is provided in a linear arrangement facing a wall, offering limited quality as a communal dining environment for 4-6 people and reduced usability.
- No dedicated laundry provision is shown within the communal area. It has been removed from the drawings.
- The layout appears constrained and unsafe during simultaneous cooking and dining, with limited circulation and access to worktop space and dining space.
- The space still has no window, resulting in the absence of natural daylight and natural ventilation. (See Section 5 below)

Taken together, these factors still indicate a limited quality of communal living accommodation for the intended level of occupation particularly at peak times.

Whilst Building Regulations and HMO licensing are separate regimes, HDC's application of the Housing Health and Safety Rating System (HHSRS) and Private Sector Housing Enforcement Policy is a material consideration in assessing whether accommodation is suitable for its intended occupancy level. The layout raises concern that the proposal may not provide a satisfactory level of amenity or functional shared living space.

The concern remains that limited communal provision may lead to reliance on private bedrooms for day-to-day living, which is not an appropriate outcome for shared HMO accommodation and should be discouraged through proper design.

4. Fire Safety, Circulation and Functional Conflict

The amended layout introduces a fire escape corridor approximately 800mm wide, which is directly interrupted by a kitchen door opening into the escape route.

This raises concern that:

- effective escape width may be reduced in practice,
- door movement may obstruct evacuation routes,
- circulation conflict may arise between everyday kitchen use and circulation through the corridor.

In addition, the proposal relies on a secondary escape route via rear bedrooms (Bedrooms 2 and 3). However, no detailed justification has been provided to demonstrate that this arrangement would function effectively in an emergency scenario where escape through the primary corridor is compromised. HDC will need to satisfy themselves that this arrangement provides an appropriate level fire safety.

Overall, there is insufficient evidence that safe and practical means of escape can be maintained without conflict between daily use and emergency evacuation routes.

5. Ventilation and Daylight – Windowless Kitchen/Diner

Horsham District Council's HMO Standards state:

"Mechanical ventilation to the outside air at a minimum extraction rate of 60 litres per second or 30 litres per second if the fan is sited adjacent to the hob (in addition to any windows)."

This wording assumes the presence of a window providing natural ventilation and daylight with mechanical extraction as supplementary provision.

No provision is made within the HMO standards for a windowless kitchen or kitchen/diner, suggesting that natural ventilation and daylight are expected components of compliant design which is a basic and reasonable expectation.

In the latest set of drawings, the kitchen/diner still has no window and relies entirely on mechanical ventilation. It still forms the only communal living and dining space within the proposed HMO. No justification has been provided in the latest set of drawings for the acceptability of this arrangement in terms of residential amenity.

This raises concerns regarding:

- adequacy of ventilation in a high-intensity cooking environment,
- odour and condensation control,
- absence of natural daylight and resulting impact on living conditions,

- the overall suitability of the space as the principal communal area for 4–6 occupants.

Taken together, this calls into question whether the proposal provides an acceptable standard of residential amenity for future occupiers.

The proposal therefore raises concerns under HDPF Policies 24, 32 and 33, particularly in relation to residential amenity, environmental impacts and functional internal design.

These concerns are supported by reference to HMO Standards and the HHSRS, which both identify adequate ventilation, daylight, and safe, usable communal space as key factors in determining acceptable residential conditions.

Accordingly, it is not demonstrated that the development provides an acceptable standard of amenity for future occupiers.

6. Ceiling Heights – Compliance Uncertainty

Concerns have not been addressed regarding compliance with Horsham District Council's HMO standards for minimum ceiling heights.

Based on the submitted amended drawings:

- Bedrooms 2 and 3 have not been clearly demonstrated to achieve compliant headroom due to stepped floor levels and incomplete sectional information.
- Bedroom 4 is still shown at 2.263m, which is below the HDC's HMO indicative minimum standard.

It is also noted that neighbouring properties of similar form within the terrace have marginal headroom in the same rooms. While neighbouring properties are not subject to HMO standards, this reinforces the need for precise verification.

Accordingly, clear sectional drawings and verified dimensions are requested to confirm compliance with HMO space standards.

Thank you for reading.

Kind Regards,



cc

Planning Committee Councillors: Councillor Peter Vanderborgh, Councillor Paul Clarke, Councillor Jon Campbell, Councillor Mike Croker, Councillor Nigel Emery, Councillor Anthony Frankland, Councillor Dennis Livingstone, Councillor Jay Mercer, Councillor Roger Noel, Councillor Sam Raby, Councillor Claire Vickers, Councillor Len Ellis-Brown, Councillor John Trollope, Councillor Colette Blackburn, Councillor Lynn Lambert,

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Cabinet Member for Planning and Infrastructure: Councillor Ruth Fletcher

Principal Environmental Health Officer - Penny Marsh.