

From: **James Elliott** <james.elliott@adur-worthing.gov.uk>
Date: Thu, 27 Mar 2025 at 15:58
Subject: NOTICE/0002/25
To: Louise Prew <louise.prew@adur-worthing.gov.uk>

Hi Louise,

Please could the following comment be added as an informative to this application.

The layout of the proposed development creates a hazard, as defined by the Housing Act 2004 (The Act) and the Housing Health and Safety Rating System (HHSRS). If the development occurred as proposed, this would likely result in the Council having to take one or more enforcement actions, including prohibition of the whole dwelling or service of an Improvement Notice requiring works.

Either action could prove costly to an owner/developer. Enforcement action under the Housing Act 2004 is not time-barred and is tenure neutral.

The principle of the Act and the HHSRS is that if a property is suitable for the most vulnerable group, then it should be safe for anyone to occupy.

Layout

The proposed layout creates two bedrooms accessed from the high-risk kitchen-living area. This inner room arrangement places sleeping occupants at greater risk of harm or death in the event of a fire.

Compliance with Building Regulations i.e. reliance on an emergency egress window, will not be sufficient to mitigate the risk, as vulnerable householders are unlikely to be able bodied persons.

For fire safety this is older people who may have reduced mobility, although the Operating Guidance also considers the risk to young children, who are also the vulnerable group for falling between levels.

To avoid the need for enforcement action and/or retrospective work, the internal layout will need to be reconfigured so that bedrooms are not accessed from risk rooms. Alternatively, it may be possible to mitigate the risk of the open plan layout by installing a fire suppression system.

Kind regards,

James Elliott

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