

Supporting Planning and Design Statement "The Proposal" Section 1.5 "The nature of the largely internal works will allow occupation on individual rather than group basis. This is essential to attract and retain seasonal staff".

The above statement would indicate that each of the rooms (excluding room 6) would be used by individual occupiers. The proposed layout plan would indicate that the occupiers (excluding room 6) will be sharing the kitchen and bathroom amenities. Working on the assumption of 8 single occupiers in the remaining 8 rooms sharing the amenities, the standard test for Houses in Multiple Occupation (HMO) would most likely be met.

Based on my understanding of the plans submitted I would raise the following matters for consideration by the Planning department and the Developer at this stage.

1. As there will be more than five occupiers sharing facilities, as of October the 1st 2018, the Licensing of Houses in Multiple Occupation (Prescribed Description) (England) Order 2018 would likely require the proposed accommodation to be licensed under Part 2 of the Housing Act 2004.
2. Some of the room sizes look very small in dimensions on the plan submitted. The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018 requires the Local Authority to make additional Mandatory Conditions on any licence issued after the 1st October 2018. This Legislation introduces mandatory room sizes for HMO's. In terms of the proposal plans for staff accommodation; a single occupancy sleeping room with a dimension less than 6.51m² (usable space) cannot be occupied by anyone over 10yrs old. *Other sleeping accommodation room sizes are also affected.* It would be inadvisable to create room sizes at this stage that are less than the permitted size beyond an 18 month transitional period for licensable HMO's.
3. The developer should be aware of the mandatory amenity standards for licensable HMO's at the time of development to prevent any unnecessary duplication of works and costs. Room sizes and amenity standards dictate the maximum occupancy in licensable HMO's.
4. As the premises is in a geographically high Radon area with a predominantly below ground level accommodation proposed, a Radon assessment should be undertaken to determine if any remedial measures are required to be installed at the time of construction. The Housing Health and Safety Rating System under Part 1 of the Housing Act 2004 recognises that measurement is the only way to determine potential threats to tenants/ occupiers health so to determine if the Government action level of 200Bq m⁻³ is met. Building Control will possibly comment on this element also.

In summary:

The Environmental Health team for CIOs would like to offer the developer/ Tregarthen's Hotel Limited the reassurance that notwithstanding the above concerns should the developer wish to communicate with the Environmental Health department, we offer support and guidance without fee on legal compliance under various elements of housing law.

Should the premises require a licence post development, upon application we would seek to issue a full five year licence under our current policy.

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