From: O'Mahony, Jacqueline Sent: 07 February 2018 15:55

To: Thomas, Edward

Subject:

Hi Ed, apologies, correct address now included. Regards

Jacqueline

Jacqueline O'Mahony B.Sc.(Hons), M.Sc., Ph.D., MCIEH. Environmental Health Officer Environmental Health & Trading Standards, The Herefordshire Council, 8 St. Owen Street, Hereford, HR1 2PJ

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MEMORANDUM

To : Edward Thomas , Senior Development Control Manager

From : Jacqueline O'Mahony, Environmental Health Officer - Housing, EHTS, x1914

Date: 7th February 2018 My Ref

17883: 40-46 Commercial Street HEREFORD : Proposed conversion of retail units into 17 dwelling flats.

They are to assist the applicant, and to save time and money should the application go ahead. They are provided to assist any future occupants of these flats, including housing landlords, and to prevent complaints to the Environmental Health Housing Team, who enforce the Housing Act 2004, and other Acts of Parliament in relation to domestic premises. We inspect against 29 Hazards, and all of these premises should be free of Category 1 Hazards, under Part 1 of the Act.

The application relates to the conversion of retail space into 17 flats over 3 storeys. Access to these flats will be via ground floor staircases. It is assumed that there will be retail outlets on the ground floor. Location of this development is next to and will overlook an established public house with outdoor beer garden.

While in principle, provision of additional housing is to be welcomed, in its current format, Environmental Health Housing would object to the proposals, for reasons given below. Overall comments relate to:

- Size and <u>useable</u> living space for 21st Century everyday living (especially bedrooms and kitchens),
- b. layout of flats,
- c. light (particularly in bedrooms),
- d. drainage (all),
- e. heating
- f. outdoor space for the storage and collection of waste (all),
- g. outdoor space for hanging/drying washing (all),
- h. fire safety/travel times to exit the property

1. SPACE/ SIZE (Hazard 11)

Some of these flats are below the average floor area for the UK. In addition, whilst actual square footage of a bedroom might indicate a reasonable size, the actual usable space can in fact be minimal if the room shape is not the usual square, as is apparent in many of the proposed bedrooms. Particular examples are: First floor flat 5, and Second floor flat 5. These would be far more appropriate as 1 bedroom flats, with decent storage space/ a laundry room.

2. LAYOUT: Noise (Hazard 14)

It is essential to consider the proposed layout of flats, for example consideration needs to be given to having bedrooms in 1 flat next to the living area in the next, bedrooms on one floor a located above/below living space in the one above below. Unless the insulation is of very high quality both horizontally and vertically, (and not forgetting noise travelling up from any proposed retail outlets on the ground floor), complaints about neighbours will result, just because of what is termed "everyday living", especially walking on hard floors which are the norm nowadays. Another example of layout would include the location of pipework for bathrooms and kitchens, could these rooms not all be grouped together in clusters on each floor between floors, to make installation of pipework more efficient?

The original layout for first floor flat 7 makes more sense than the revised one, if a window in included.

The plans for the third floor flats do not appear suitable.

3. LIGHT (Hazard 13)

Bedrooms without windows/internal rooms are not permitted. Velux windows in a roof are not considered adequate, as the occupant has no access to a view. Rooms with no windows would be prohibited from use.

(examples include: FF Flat 6, Flat 7; 2F Flat 6; 3F Flats 1 & 2)

4. PERSONAL HYGIENE SANITATION AND DRAINAGE (Hazard 17)

There are no indications of location of sanitation and drainage pipework on the plans. Would it be sensible to locate all new bathrooms/kitchens in groups, both on each floors and between floors to facilitate efficient drainage pipework/management.

EXCESS COLD (Hazard 2)

There are no details of heating systems in this application. These need to be suitable, sufficient and EFFICIENT (cost effective for the occupant) to run.

6. DOMESTIC HYGIENE, PESTS AND REFUSE (Hazard 15)

Good design will include adequate provision for the storing and disposal of household refuse. With much separation now of domestic waste into general and recycling, there needs to be sufficient space provided both in kitchens and outside, to facilitate this.

7. DAMP & MOULD GROWTH (Hazard 1)

Windows need to be accessible and openable, especially in bedrooms. Extraction systems in kitchens and bathrooms in this application must to be suitable and sufficient to prevent build up of black mould leading to complaints to EH Housing.

There do not appear to be provisions for the drying of clothes, either inside or outside.

8. FIRE SAFETY (Hazard 24)

It is assumed that both Building Control and the Hereford & Worcester Fire & Rescue Service will comment on fire safety issues. The flats will have to comply with fire safety under the Housing Act 2004. There needs to be sufficient Fire Separation between any adjoining properties, and between floors. This could also be combined with sufficient sound insulation both vertically between flats and horizontally between floors. The flats on the 3rd Floor are of particular concern in relation to travel distances.

Jacqueline O'Mahony 7 February 2018.