HMO GUIDE · CONVERSIONS, FIRE SAFETY & PLANNING

HMO Conversions & Article 4 — A Practical Guide

What must be upgraded when converting a house to an HMO in England

A practical checklist for landlords and investors converting a family home (Use Class C3) to a small shared HMO (Class C4). Covers the fire safety upgrades councils expect, amenity standards, management and waste duties, and when Article 4 means you need planning permission even if you change nothing physically.

JN COMPLIANCE & SAFETY SOLUTIONS LTD · PRACTICAL GUIDE SERIES

1. Fire safety — the non-negotiables

Fire safety is where most HMO conversions succeed or fail. Councils and fire authorities benchmark housing fire risk assessments against BS 9792:2025, which superseded the old LACoRS guidance. Exact requirements are set by the risk assessment and your council's HMO amenity standards, but the following is the typical package for a small shared house.

Fire doors (FD30S)

- FD30S doors to every bedroom and to the kitchen
- Intumescent strips and cold-smoke seals fitted to the door or frame
- Self-closing devices on all doors onto the escape route
- Correct gaps, hinges and ironmongery — a certified door fitted badly is a failed door

Detection — typically Grade D LD2, interlinked

- Smoke alarm in the ground-floor hallway
- Smoke alarm on the first-floor landing
- Heat alarm in the kitchen
- All alarms mains-powered with battery back-up and interlinked (radio or hard-wired)
- Larger or higher-risk HMOs may need LD1 coverage or a Grade A system

Protected escape route

- Stairs and hallway form a protected route — all doors onto it FD30
- No combustible storage in the escape route
- Thumb-turn lock on the final exit door — no key needed to get out
- Emergency lighting where the route is long, internal or unlit

Kitchen fire safety

- Fire blanket by the cooking area
- Heat detector (never a smoke alarm) in the kitchen
- Mechanical extraction
- Sockets positioned safely away from hob and sink

Fire Risk Assessment

- A written FRA under the Regulatory Reform (Fire Safety) Order 2005 is mandatory for the common parts
- Insurers routinely ask for it — and it supports a planning or licensing application
- Review annually, or sooner after any material change

2. Amenity standards — space, kitchen and bathrooms

Amenity standards are set locally: each council publishes its own HMO standards or SPD, so always check the authority the property sits in. The national minimum room sizes in the Housing Act 2004 (as amended) are a floor, not a target — many councils require more.

Bedroom sizes (national minimum)

- 6.51 m² for one person over 10 years old
- 10.22 m² for two people over 10 years old
- 4.64 m² for a child under 10
- Floor area under 1.5 m in height does not count
- Local standards frequently exceed these figures

Kitchen — typical requirement for 3–5 sharers

- Four-ring hob and oven
- Sink with drainer and adequate worktop
- Fridge and freezer capacity for the number of occupants
- One lockable or allocated food cupboard per occupant
- Mechanical extraction

Bathrooms and WCs

- Commonly one bathroom containing a WC per up to four or five occupants, or one bathroom plus a separate WC
- Wash-hand basin provision and hot water at all times
- Ratios vary by council — confirm before you commit to a layout

3. Management, waste and safety certificates

Once tenants are in, the Management of Houses in Multiple Occupation (England) Regulations 2006 place continuing duties on the manager — from displaying contact details to maintaining the common parts.

Tenancy and property management plan

- Anti-social behaviour policy
- Waste and recycling arrangements
- Planned maintenance schedule
- 24-hour emergency contact details displayed in the property

Waste and recycling

- Adequate bin capacity for the number of occupants — councils commonly expect 240L general plus 240L recycling
- A designated, screened storage point (side passage or rear yard) — not the front pavement

Certificates you must hold

- EICR — five-yearly Electrical Installation Condition Report
- Annual Gas Safety Record (CP12) where there is gas
- PAT testing of landlord-supplied appliances
- Fire Risk Assessment and alarm/emergency-lighting test records
- Legionella risk assessment and EPC

4. Planning — Article 4 and the C3 to C4 question

Nationally, converting a dwellinghouse (Class C3) to a small HMO for 3–6 sharers (Class C4) is permitted development — no planning application needed. That permitted development right is removed wherever the council has made an Article 4 Direction, which many cities now have across large parts of their area.

Where an Article 4 Direction applies, you need full planning permission for the change of use even if the building is left exactly as it is. A land charges search on the property will normally state this in terms — for example: “Planning permission will therefore be required for change of use from Class C3 to Class C4.” Large HMOs of seven or more sharers are sui generis and always need planning permission.

Applications are judged on local HMO policy, so the evidence that helps most is:

- Concentration — how many existing HMOs sit within the policy radius
- Planning history of the property and immediate neighbours
- Amenity impact — noise, parking pressure, bin storage, overlooking
- Anti-social behaviour record in the street
- Standard of accommodation proposed, measured against the council's HMO SPD

> A property with no nearby HMOs, no adverse planning history and no amenity or ASB conflicts has a strong case — but it still has to be made properly, in the council's own policy language.

5. The short version — what must be done

- FD30S fire doors to bedrooms and kitchen, with strips, seals and closers
- Interlinked mains-powered alarm system (typically Grade D LD2)
- Protected escape route with thumb-turn final exit
- Fire blanket and kitchen fire precautions
- Written Fire Risk Assessment
- EICR, Gas Safety Record and PAT testing
- Tenancy and property management plan
- Waste and recycling plan
- HMO licence where the property is licensable
- Planning permission for C3 to C4 where an Article 4 Direction applies

How JN Compliance helps

We handle HMO conversions end to end: a pre-purchase or pre-application feasibility review, the fire safety specification and Fire Risk Assessment, the Environmental Impact & Amenity Report that supports a C3-to-C4 application, the licence application itself, and the management documents you need on day one. Contact us for a quote tailored to the property and the council it sits in.