

## Sub-division Consultation Responses

	Respondant	Precis of Comments	Support or Against	Council Response
1	Banbury Town Council	The planning committee welcomed the document as they had been concerned about sub-division of buildings for some time and were pleased that the document would become a material consideration in the determination of planning applications. They welcomed the setting out of absolute minimum dimensions and the impact that sub division has on the street scene. However the committee felt that the heights of rooms when completed should be inspected by planning officers to ensure that someone of average height could walk around easily. They also sought assurance that enforcement action would be taken where these standards were not met. Whilst they welcomed the section on the impact on the street they were concerned that sub-division nearly always leads to an increase in on-street parking. They were also concerned about the loss of front boundary walls of under 1m as they are important in the street scene.	Support	Plans submitted for conversion should indicate ceiling heights and so applications with inadequate height would not be approved. Any construction not in accordance with approved plans could be subject to enforcement action. Matters not covered by planning control, such as the retention of boundary walls under 1m high, can only be controlled by the imposition of Article 4 Direction. English Heritage advises that Councils should serve Article 4 Directions to remove specific permitted development rights within conservation areas
2	Kidlington Parish Council	The Parish Council is concerned that the minimum floor sizes in the draft document for 1 and 2 bed flats is less than the HCA standard.	Neutral	The HCA standards are generous and most Councils' private sector housing standards are not as high. To ensure that the justification for the standards in this document are robust, they are based upon real life room layouts

3	Bicester Town Council	<p>The Town Council welcomes the draft document and would like to make the following comments which are felt will further strengthen and clarify the position with regards to the sub division of family homes.</p> <p>1 - While conversion in itself may not be problematical the ripple effect on local access and parking needs to be identified and taken into consideration. For example converting a house into four flats could easily quadruple the number of cars parking in the vicinity.</p> <p>2 - With regards to HMO's we are concerned that the guidance does not specify hard wired fire alarms in each room or that proper fire exits are identified.</p> <p>3 - We also note that there is no guidance about the provision of and size of bathroom space in HMO's.</p> <p>4 - Finally while the guidance will set minimum conversion standards for rooms it does not address the very real concern that many family homes will be lost as a</p>	Support	<p>1 - The impact of additional parking would be a material consideration in the determination of any planning application for the conversion of an existing building.</p> <p>2 - The provision of fire alarms and exits are controlled by the Building Regulations. Fire exits are discussed in the document under sub-heading 'Means of Escape' and the Building Regulations in general in paragraphs 97 and 98.</p> <p>3 - The document has been amended to reflect this concern.</p> <p>4 - The Council currently does not have a policy which protects one size of home over another. Any policy would need to be based on a survey of the housing stock of the District. It was considered that this level of research was outside of the scope of this document.</p>
4	Councillor Alastair Milne Home	<p>This subject has been of great concern for the last 2 years, specially in Grimsbury. I am delighted to understand that it is proposed to do something about the problem.</p>	Support	<p>Comments noted.</p>
5	Councillor Ken Atack	<p>I am of the opinion that the document provides well constructed advice in a rounded policy format which offers practical, sensible and desirable requirements for the District. It may be too late for Grimsbury, but better to have a policy in place than not. I believe there will be pressure in urban areas going forward for more multi occupied accommodation.</p>	Support	<p>Comments noted.</p>
6	Councillor Chris Smithson	<p>I welcome the document as it is something I mentioned over a year ago. Hopefully it will reduce the number of further sub-divisions. My concern is the enforcement of materials used, as the builder can nominate his own building inspector. For example, when you detail sound proofing material, how do you know it has been installed, as CDC planning inspectors do not visit the conversion. Likewise how do you know the electric cabling is up to the current regulations, because the wiring is concealed, along with many other materials.</p>	Support	<p>In determining planning applications the case officer will have regard to the impact that compliance with Building Regulations will have on the appearance of the property.</p>

7	Julian Dingle (Private Landlord)	I support the general proposal to apply minimum standards, however I do not feel able to comment with any authority on the standards you are proposing. A degree of flexibility needs to be adopted when considering kitchen facilities in studios and bedsits, especially if there are shared facilities elsewhere in the house. In my experience it is unnecessary to insist on a comprehensive kitchen arrangement within the room. In fact a combined sink/cooker/microwave/fridge unit is all that is required. I am also surprised by the amount of people that prefer a small room, usually because it is less rent. I agree that the impact on any conversion on the street scene needs to be minimal, having said that it is no good having a policy if you are not going to enforce it. (a previous issue regarding satellite dishes is mentioned).	Support	It is considered that the kitchen arrangements provided in the appendix of the document are of sufficient flexibility to accommodate variations in floor plans.
8	Harvey Pitt (Development Manager - Greensquare)	I have reviewed the document and fully support the proposals. The document makes reference to HCA standards which we have found to provide a high level of accommodation and this is supported by feedback from our residents of recently developed properties.	Support	Comments noted.
9	Pauline Washington (Residential Lettings and Property Management)	As a letting agent I come across various problems with flats whether purpose built or conversion. In my opinion there are too many flats in Banbury. Any improvement in size, content and location would be welcome. I would like to see the following; letter boxes in all doors, detailed locations at the entrance of each block of flats for meters including electric, gas and water. Storage facility for bicycles and push chairs. Drying area for clothes, parking and outdoor space. In general we need more one and two bedroom houses with outdoor space for young and growing families.	Support	The draft includes guidance on all of the issues raised. Comments noted.
10	Clare Wright (C.B Wright and Associates Ltd)	There has clearly been a substantial amount of work and it should be a good and useful document to help in shaping more acceptable schemes.	Support	Comments noted.
11	Iain Geddes (Architect)	This is a subject of great concern to the people I speak to in Oxford City. I shall let you have further comments once I have read it through. I have also copied this email to the Southern Area RIBA Branch so that the issue can be considered by the appropriate planning committee.	Neutral	No further comments have been received.

12	Graham A J Soame (MRTPI)	I have briefly read through the document and find it to be overly prescriptive. It will in my experience lead to more work, more cost and more delay. I am not sure it will significantly improve the quality of submitted applications. Are there not enough established Government and EU Documents 'out there' that you can refer to and rely on already? I'm sure you are not going to listen to me on this, but in an era of belt tightening, I am surprised your Council can see their way to finding the funds to firstly prepare this and secondly to implement it.	Against	The document is aimed at improving the quality of planning applications and therefore it is anticipated it will reduce work and the need to negotiate improvements. The quality of the sub-division of existing buildings has been of great concern to the Council for some time, this document is aimed at improving those living environments. There is currently no government published document which covers private sector housing. The cost of preparation has been absorbed in normal resources and wider costs to the Council are not anticipated to increase.
13	Kevin Prior (Private Landlord)	1 - I do not think this should become a rigid set of rules, particularly for private development, market forces will naturally control room sizes. 2 - Insisting on the provision of a bath for a two bed flat seems unnecessary, most people prefer a shower which is more eco friendly. 3 - The document should not contradict Building Regulations, most of the internal considerations noted are covered by the Building Regulations and I don't see a need to reinforce it here.	Against	1 - The document does not set rigid rules, just minimum sizes to create decent homes. Market forces have been resulting in very small homes. 2 - The inclusion of a bath in a two bedroomed flat is considered necessary as it may be occupied by a young family and it is difficult to bath a small child in a shower. 3 - Some of the issues mentioned are covered by Building Regulations, but the document does not contradict them. In the case of ceiling heights for example there is no minimum requirement in the building regulations and that is why it has been included.