

Michael T

Having been asked for my views on this draft, these (somewhat hurried) are as follows:

1: Length: Short and succinct planning documents are more helpful, and are more likely to be read by the public.

One ideally should be able to fit the salient contents onto 4 pages of A4: being an A3 sheet, folded.

2: It should be clearly stated that:

* Planning Permission for change of use from C3 to C4 is only needed in the Article 4 area:

* In the rest of the Borough, changing from C3 to C4 does not need Planning Permission:

* Planning permission for change of use from C3 to Sui Genesis (7+) is needed in the whole of the Borough:

(Is this the case? - it is not made clear in the draft?):

3: An HMO Licence is needed for all HMO proposals in the whole of the Borough:

4: It should be made clear that **none** of the information in the Licence form is "material" in planning terms:

It would be absurd for example to take into account whether the person applying for permission is a "fit" person:

5: Approval under the Building Regulations is required for building works, and again, is not "material":

6: The point being that one should not attempt to make "planning" all-encompassing:

It is entirely sensible that one may be granted planning permission, but be unable to obtain a Licence etc.(3.3)

7: Having different standards for WC's etc in the "Planning" and the "Licensing" is unhelpful, and confusing (5.27).

8: The planning criteria listed (accessibility, parking, internal space, outside amenity space, external waste space, external design, conservation and heritage, urban greening, etc) are already covered in the Local Plan:

Which raises the question....is this (if you will allow the phrase long-winded?) repetition really needed?

Could one massively shorten each element for the ordinary reader?

9: The only additional "planning" element that is not covered in the Plan seems to be the "sandwich test":(6.3):

Looking at the example, 3 adjoining HMO's seem to be acceptable, but is this concentration a good thing?

Might one consider a policy that a new HMO should be separated from an existing HMO by at least 2 properties?

One hopes that the various consultation responses will be found helpful.