

187 Divinity Road OX1 5BJ: Revised Application for retrospective change of use from C3 to C4

Context

The following is a Revised Planning Submission dated (02/02/2024) follows up the previous Submission 23/02001/FUL.

This application addresses the rejection reasons concerning: 1) HMO Density and 2) Waste Storage (addressing the technical requirements).

History

We bought 187 Divinity Road OX41LP on 7/01/2013. The previous owner provided a traditional full-board and lodgings.

In 2015 we completed necessary minor internal alterations (two fire doors and fire alarm) to the property to enable us to meet all the HMO standards. We have been certificated by Oxford County Council to provide HMO accommodation since 2015. In the last nine years we have successfully passed all the HMO inspection regimes. The inspectors have all said it one of the best HMO letting homes (rather than letting houses) in Oxford.

We fully commit to meeting, and exceeding, all the HMO requirements.

In terms of HMO space requirements all rooms exceed the guidelines by some measure. We have converted one of small bedroom into additional en-suite shower room, all the bedrooms are much bigger than standard double room size. The tenants enjoy uninterrupted use of an extensive garden. We provide secure shelter for bicycles and continue to be strongly in favour of sustainability and manage the recycling and general use bins well. We have a policy to let too post-doctorship and professional tenants. We have never received a complaint from our neighbours about the behaviour of our tenants. It is an exceptionally well managed HMO.

In terms of HMO density within 100 meters either side and including all the HMO's in that space we are below 20% - including 187 Divinity HMO licence.

We are delighted with the new traffic management system on Divinity Road – it is life changing to the whole of the street. We strongly encourage micro-journeys to be by foot, cycle or local transport (the closest bus stop is within 160 meters of the property). We will not be seeking any additional parking permits.

Key National Planning Policy Framework and the Oxford Local Plan 2036. The following list has been identified as the key sections of national and local planning guidelines.

S1 Sustainable development. DH1 - High quality design and place making. DH7 – External features and stores. H6 - Houses in Multiple Occupation (HMO). H14 - Privacy, daylight and sunlight. H15 - Internal space standards RE2 - Efficient use of Land. RE7 - Managing the impact of development. M1 - Prioritising walking, cycling & public transport. M3 - Motor vehicle parking. M5 - Bicycle Parking.

Planning History:

65/15998/A_H - Alterations to form bathroom. PDV 9th February 1965.

73/00245/A_H - Ground floor extensions to form bedroom. PDV 16th February 1973. RESPREA 22/01585/PAC

Site:

187 Divinity Road was built as a semi-detached property. At some stage property 185 Divinity, was connected to 183 Divinity. This gives the appearance of a terrace, but the design features of the property reveal that the buildings 185 and 187 were, at one stage separate from 183. Therefore, in our opinion and subject to full scrutiny 187 Divinity is a semi-detached building. 187 Divinity is a two-storey property located in the east of Oxford. The property sits on the north side of the street and is constructed under a tiled roof and finished in render. The property benefits from a two-storey bay window to the front elevation.

Mrs Yan Zhang and Mr Stephen Holley are the current owners of 187 Divinity. 187 Divinity was purchased on the 07/01/2013. The previous owner provided full-board and lodging accommodation with separately metered rooms; we cannot identify whether she had applied for HMO status. The previous owner had separate electricity meter in each bedroom where her lodgers paid for their own metered usage (advised by the vendor's agent), they were removed when the electrical system was rewired. We bought the property and lived in the property as a family for 2 years before we moved to our current home.

In 2015 we applied for and were awarded HMO status and from that point forward we began to let 187 Divinity on a multiple-occupancy basis. To comply with HMO requirements, we made all the necessary changes to the property including converting a bedroom into an en-suite, completing fire safety standards. Since 2015 we have had uninterrupted licences and met all the review requirements. The current HMO licence (23/009917/HMOMAN) was issued on the 17/01/2023. Reports from the HMO re-inspection have included the statement that it is one of the best presented HMO's in Oxford – of which we are rightfully

proud.

We have made every effort to maintain the property to a high standard and provide our tenants with the best possible living environment. We were pleased with the positive comments made by the HMO officer, who regarded our property as one of the best homes rather than a typical letting house. Our policy for letting is exclusive to young professional post doctoral graduates. They are invariably employed by the University, Hospitals, or Technology businesses in the Oxford. These tenants typically have fixed-term employment contracts with their employers lasting for between 1 or 2 years. On average they stay with us for the whole period of their employment contract. Many of our tenants work in the medical/biomedical sectors, contributing to the thriving Biotech sector in Oxford. Our tenants have enjoyed their stay, and when they move on, they have recommended the property to their colleagues.

We are now seeking retrospective permission to use the property as C4 - HMO, which denotes a house in multiple occupation. We believe that since the property has always been used for multiple occupancy (except for the two-year period when we lived there as a family), and we solely let to professional tenants, we have not altered the housing market in Oxford. In essence, we see this as not a change of use but rather a retrospective license to continue the current use.

Revised Retrospective Application

Revised Retrospective application for change of use of the property from a C3 Dwelling house to a C4 HMO. Officers note that the pre-application advice has been sought on the basis of a retrospective application, given that from the information provided, as well as council records, the property has been in use as a C4 HMO since 2015. The previous Application 23/02001/FUL was rejected for two reasons. Being 1) HMO density and 2) Waste storage planning. This revised application addresses both of these issues.

DH1 - High quality design and place making.

Design Policy DH1 of the Oxford Local Plan 2036 states that planning permission will only be granted for development of high-quality design that creates or enhances local distinctiveness. Proposals must be designed to meet the key design objectives and principles for delivering high quality development, set out in Appendix 6.1. The change of use would not result in any design alterations or building works. The appearance of the building will not be materially different from the existing arrangement.

DH7 – External features and stores

The front garden is accessed over red and black original tilled path. To the right in front of the house are two sections - a concrete hardstanding and a retained soil planting area section. The total space is enclosed to the front by a short brick wall (4.2m in length) and to the right a 2m high well maintained hedge. The total area is slightly less than 10sqm.

187 Divinity has a shared access to the right of the building. This shared access, which is level to the kerb, leads to the garden. The shared access is 1.2m wide. Access is provided through a secured metal frame, solid wood external door which is lockable. Access then passes through a second locked gate into the back garden. Once through the second locked gate access then leads through a small courtyard to the garden. The garden is always accessible to the tenants. The rear garden is some 18.83m long by 5.44m wide. The garden provides 102.4m² accessible outside space. In the garden are two buildings - a permanent outside building (9m² on the Plan No. 3) and a second ordinary shed with roof.

External Garden

187 Divinity has an external rear garden of some 94 m². The garden is mainly put to lawn, but it does have a border which is a over bed containing: Peonies; roses; bluebells and rambling roses. This can be accessed by all the tenants through a back gate and a door from the lounge/living room. The change of use does not impact upon the outdoor amenity space and provides sufficient shared garden space amenity for the day to day needs of occupiers.



Bicycle parking provision

Bicycle parking provision - in accordance with Appendix 7.47.3. should be, well designed and well- located, convenient, secure, covered (where possible enclosed) and provide level, unobstructed external access to the street.

Bicycles can be taken through the secure shared access gate from street level. They can be taken down the level garden and stored in the two garden buildings. The two buildings are enclosed and provide secure shelter for at least five cycles. Therefore, the property provides tenants with bicycle parking provision as set out in Appendix 7.47.3.

Cycle Port provides:

- Attractive design
- Well located
- Convenient
- Secure
- Covered
- Enclosed
- Level
- Has unobstructed external access to the street.



Waste Bin Storage: Meeting the Planning Technical Advice November 2014

Requirements:

General & Purpose Built HMO

- a) Residents should not carry waste more than 30m to the storage point
- b) Waste Vehicles should get to within 25 m of the storage point
- c) Individual dwelling-storage and location should be: 1) Easily movable to collection point 2) design in-keeping 3) Not moved through a dwelling 4) sufficient space.
- d) Purpose Built HMO – 1) Stored at street level 2) 2m high 3) not used for other purpose 4) adequate ventilation
- e) Developments of change of USE 1) type of waste will increase

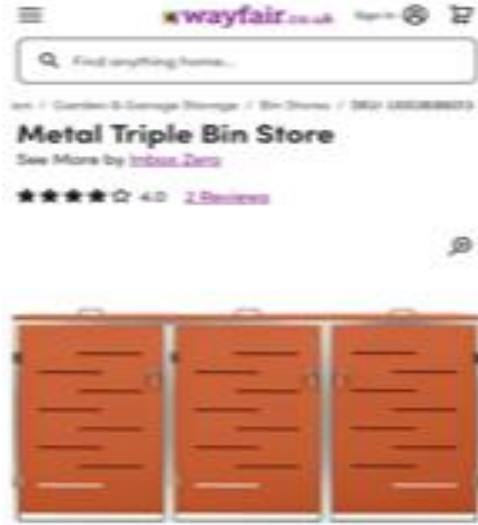
The garden at the front of the house are three sections - a **concrete hardstanding, slabbed hardstanding** plus a retained soil planting area section. The total space is enclosed to the front by a short brick wall (4.2m in length) and to the right a 2m high well maintained hedge. The total area is slightly less than 10sqm There is hardstanding on the front garden.

The waste bin **storage is in the front of the building** – therefore waste bins do not have to be moved through the property. **The bins are 2 meters from the front door - and therefore well below the 30m maximum.** The bin storage area is **NOT used for anything else.** The front garden is at **street level**, is accessed over hardstanding and red and black original tiled path – **which makes wheeling the bins to the collection point easy.** It is at street level.

Number of buns reflecting HMO usage: There are **THREE bins** which reflect the higher occupancy of the building and **meet the requirement of the type of waste increase.** We have met the demand for extra waste by adding a second – blue- recycling bin. We now have a general waste bin 240 litre H110, W62, D 57 with a foot print of 0.3534 m² and TWO recycle waste bins also being 240 litre H110, W62, D 57 with a foot print of 0.3534 m² each. The total hardstanding requirement being 1 sqm. The bins are kept on the property footprint by a small retaining wall. The bin storage point is 3 meters from the waste collection point which is on the road. The bin collection point and the road is a curb away - **well within the 25m access for waste collection vehicles.** Tenants are expected to wheel the bins over the concrete hard standing (**which is easy**) to the collection point (**side of the street**). **This maybe a total distance of 4 m.**

Bin storage design: As part of this development we will enclose the bin storage in a purpose made four bay metal lockable storage unit. This will have the advantage of providing ventilation, security and, being metal, made from non-flammable material. We have selected the amber colour (see image) to be in keeping with the street vibe.

Triple Bin Capacity, metal, vented, and lockable. The units each have an integrated lift up lids so the individual bin can be accessed. The amber colour is in keeping with the vibrancy of Divinity road.



Current Bin Storage

Currently there are three bins - general and two recycling. The three bins are stored on the property front hardstanding and off the road.



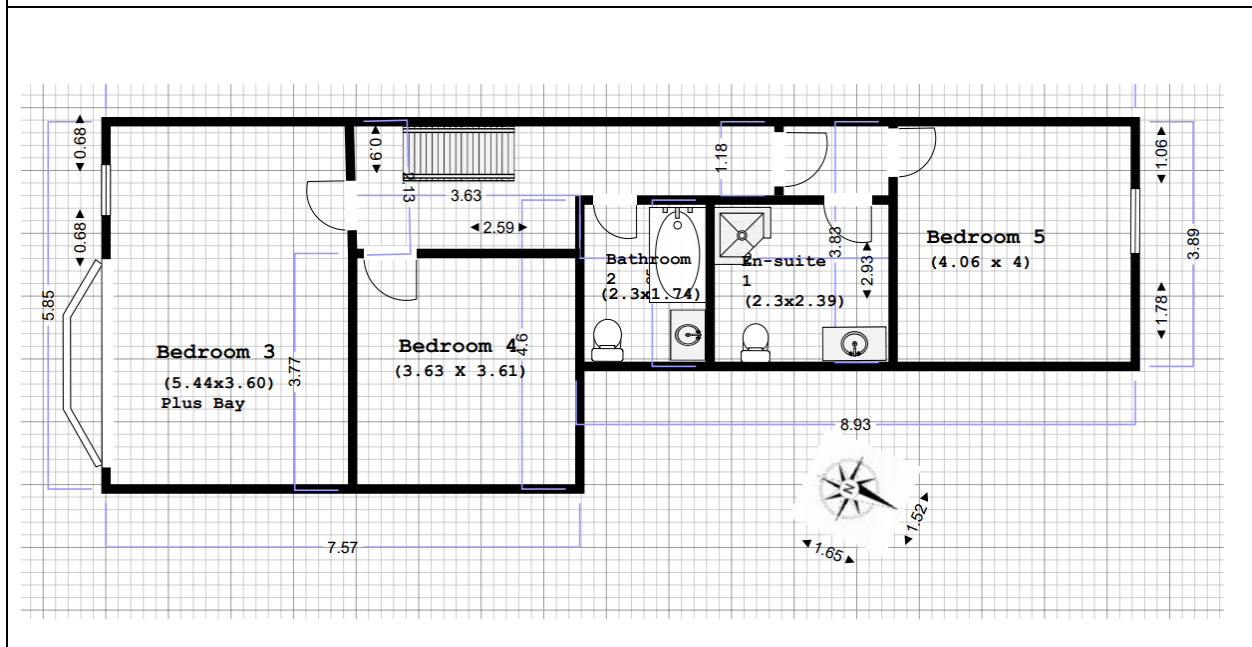
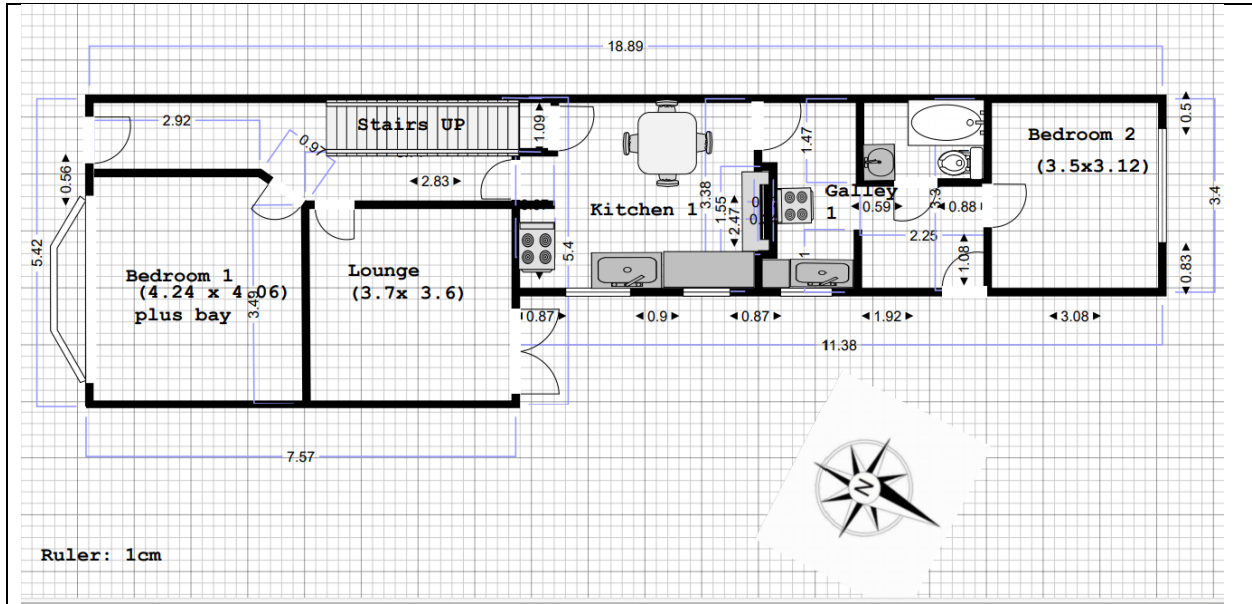
H6 - Houses in Multiple Occupation (HMO) Residential Amenity Policy H6 of the Oxford Local Plan 2036

Residential Amenity Policy H6 of the Oxford Local Plan 2036 states that permission for a change of use to an HMO will only be granted where the applicant has demonstrated compliance with the City Council's good practice guide on HMO amenities and facilities.

Oxford City Council's: Landlord's Guide to Amenities and Facilities for Houses in Multiple Occupation 2019 (LGAFHMO 2019)

S1 Private room space (LGAFHMO 2019)

The following image is from the property plan.



Bedroom sizes:

All bedrooms exceed the 6.51m² rule. The size of our bedrooms are double to triple to this standard.

Bedroom 1 Front Ground Floor is: $4.2 \times 4.06 = 17.05 \text{ m}^2$ exceeding the 6.51 m^2



Bedroom 2 Back Ground Floor is: $3.5 \times 3.12 \text{ m} = 10.92 \text{ m}^2$ exceeding the 6.51 m^2

It was constructed under planning permission: 73/00245/A_H - Ground floor extensions to form bedroom. PDV 16th February 1973. RESPREA 22/01585/PAC

Bedroom 2 Back Ground Floor has an ensuite and galley kitchen. Separated from the front of the house by a re door.

The En-suite was constructed under planning permission: The bathroom first floor bathroom was built in 1965. Under planning permission 65/15998/A_H - Alterations to form bathroom.



Bedroom 3 Front First Floor is: $5.44 \times 3.66 = 19.91 \text{ m}^2$ plus bay window. Exceeding the 6.51 m^2



Bedrooms 4 & 5

Bedroom 4 Middle First Floor $3.63 \times 3.61 = 13.10 \text{ m}^2$ exceeding the 6.51 m^2



Bedroom 5 Back First Floor plus en-suite is $4.06 \times 3.35 = 13.60 \text{ m}^2$ exceeding the 6.51 m^2



S1 Personal washing facilities/toilets: Bathroom shared by 1-4 people. (LGAFHMO 2019)

Bathroom 2: First Floor The bathroom is equipped with a bath and shower, vanity sink unit and single double flush toilet. Has a locking door for privacy. The double-glazed window opens vertically and has privacy glass. The room is vented through an Expelair vent activated from the light pull.



S1 Personal washing facilities/toilets: En-suite to Bedroom 2: Personal use. (LGAFHMO 2019) The bathroom was built in 1965. Under planning permission 65/15998/A_H -

Alteration to form bathroom.

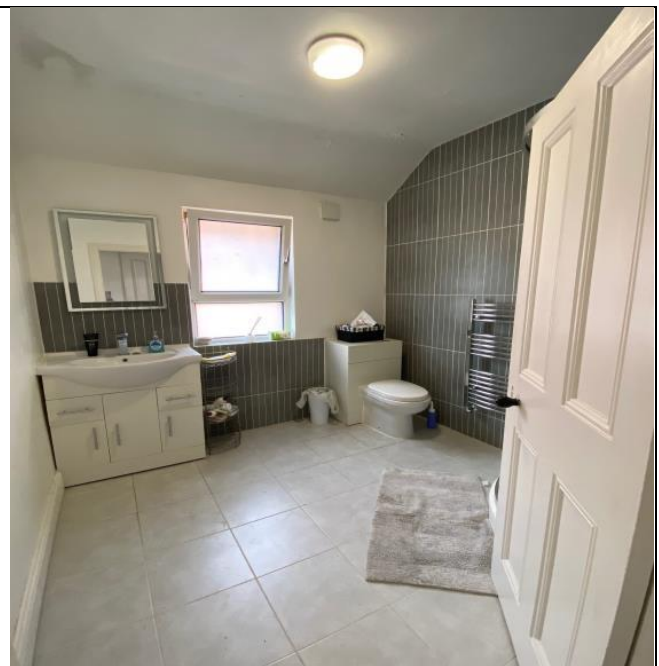
S1 Personal washing facilities/toilets: En-suite to Bedroom 5: Personal use. (LGAFHMO 2019)

This was a small bedroom (5.71 m²) that was converted to provide a separate toilet and shower for occupant of bedroom B4 (13.60 m²). The shower is electric and therefore heats separately from the main hot water system. The en-suite cannot be accessed by the other occupants being behind a separating door. The window is covered with obscure lm.

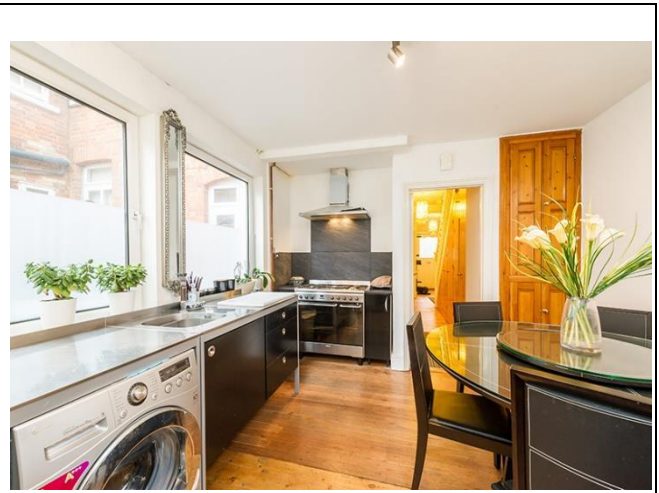
S1 Kitchen (LGAFHMO 2019)

S1 Personal washing facilities/toilets:

En-suite 1 (personal use of Bedroom 4): (LGAFHMO 2019) This was a small bedroom (5.71 m²) that was converted to provide a separate toilet and shower for occupants of bedroom B4 (13.60 m²). The shower is electric and therefore heats separately from the main hot water system. The ensuite cannot be accessed by the other occupants. The window is covered with obscure lm.



The kitchen is shared between 5 people. The kitchen has two large windows which are double glazed and which can be opened for additional ventilation. The kitchen has a five gas burning (SMEG) hob plus double electric oven. The cooker is supplied with a recycling air hood (external access was prohibited). It also has a washing machine, 165 litre fridge freezer and wood burning stove. The kitchen is 4.5x 3.33m²= 14.98 m² and in excess of the 10 m² required (6 people). It



has ample electrical sockets, storage facilities and working surfaces. The kitchen has a re alarm and monoxide testing unit. The kitchen has been supplied with a re blanket.

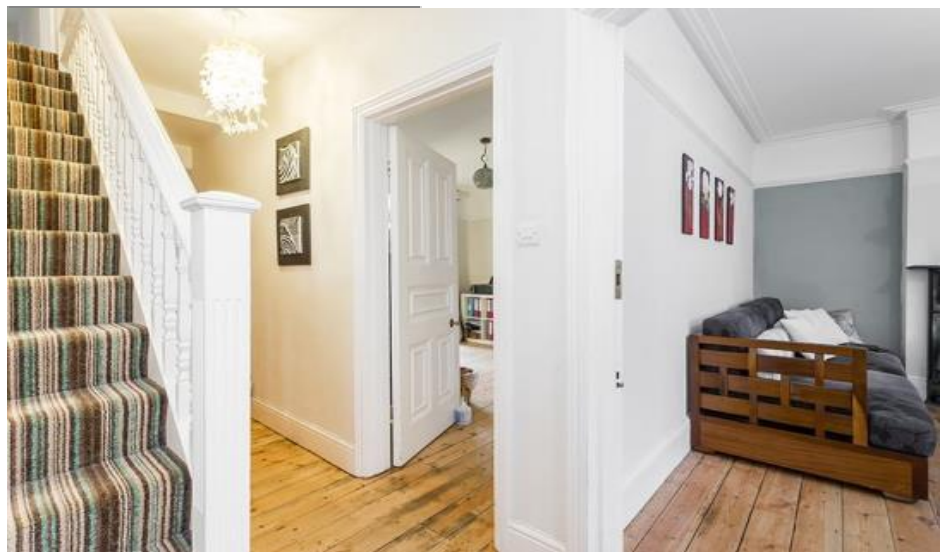


S1 Lounge (LGAFHMO 2019)

The lounge is 3.66x3.61 = 13.21m². The lounge is provided with triple and double seat sofas and provides access to the rear garden.



Hallway



S1: Fire Safety (LGAFHMO 2019)

187 Divinity is a low risk shared tenancy household. There are no inner rooms. Each room is separated either with a re door or solid wood door. Exit is through a hallway. There are two points of exit - front and back door. There are also multiple windows on the ground floor which can provide additional exit

points.

Appropriate fire doors have been added to the Kitchen providing in excess of 30 minutes fire protection. The hinges and door furniture are also 30-minute fire rated and intumescent door strips and hinge protectors have been used. The fire door is clearly marked and has a fire rated automatic sprung closure door system. The whole house is appropriately wired in re alarm. Bedroom, Bathroom and Front Door are fitted with internal turnkey locks.

S3: Space Heating (LGAFHMO 2019)

187 Divinity is heated with a Vaillant Combination boiler providing hot running water and central heating. The rooms are all (including the bathrooms) heated with radiators which can maintain the house temperature at 21 degrees when -1 degree outside. Radiators are ed with individual TVR's. The property complies with Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006 SI 373.

S4: Recycling (LGAFHMO 2019)

187 Divinity has two 240 litre BLUE recycling bin and one 240 Litre Green general refuse bin. These are stored on the hardstanding outside the front of the building within an enclosed front garden. It is the Tenants responsibility to make sure that the bins are moved to the pavement side on collection. The bins and recycling is unlikely to have any materially harmful amenity impacts

Currently there are three bins – one general and two recycling. The three bins are stored on the property front hardstanding and o the road.



Neighbouring Amenity Policy H14 of the Oxford Local Plan 2036 privacy, daylight and sunlight. 187 Divinity is not a new development. The change of use does not lead to any development that would impinge upon the daylight or privacy more than under the existing use of the site.

H6 HMO Density Policy of the Oxford Local Plan 2036

Policy advice: H6 Oxford Local Plans states that planning permission will only be granted for the change of use of a C3 dwelling house to a C4 House in Multiple Occupation (HMO) where the proportion of buildings used in full or part as an HMO within 100 metres of street length either side of the application site **does not exceed 20%**.

Analysis of HMO Density within 100 meters either side of 187 Divinity. The following analysis is based upon publicly available information including:

- Google Maps
- HMO Register
- Oxford Planning Applications

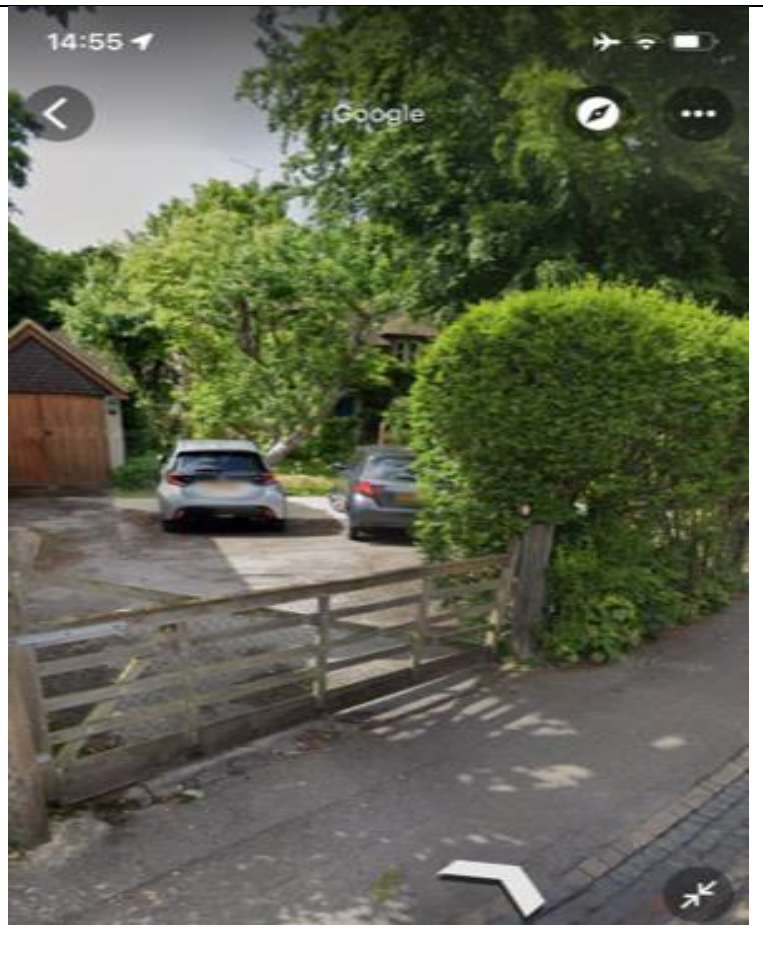
A) Denominator (number of houses/dwellings)

187 Divinity is located towards the top of Divinity Road and on the northern side of the street. The houses within 100 meters also includes several properties on Hill Top Road. The area covers the following postcodes: OX4 1LZ; OX4 1LP (Including 187 Divinity); OX4 1LS and OX41LR The number of overall dwellings within 100m to the east and west of the property has been provided through a Freedom of Information Request (FOI Request 23:02001/FUL). The data provided is detailed in Appendix 1. The total used by Oxford Planning is 60. However, the following anomalies have been identified.

1) 144 Morrell Avenue (this property can only be accessed from Divinity Road).

Subsequent enquiries have been made about 144 Morell Avenue. Oxford Planning confirmed that it was excluded because google maps identifies the entrance as being from Morell Drive. For the avoidance of doubt – 144 Morell Avenue cannot be accessed from Morell avenue. It can only be accessed from Divinity Road and therefore it should be included in the list. This increases the number of buildings by 1 building.

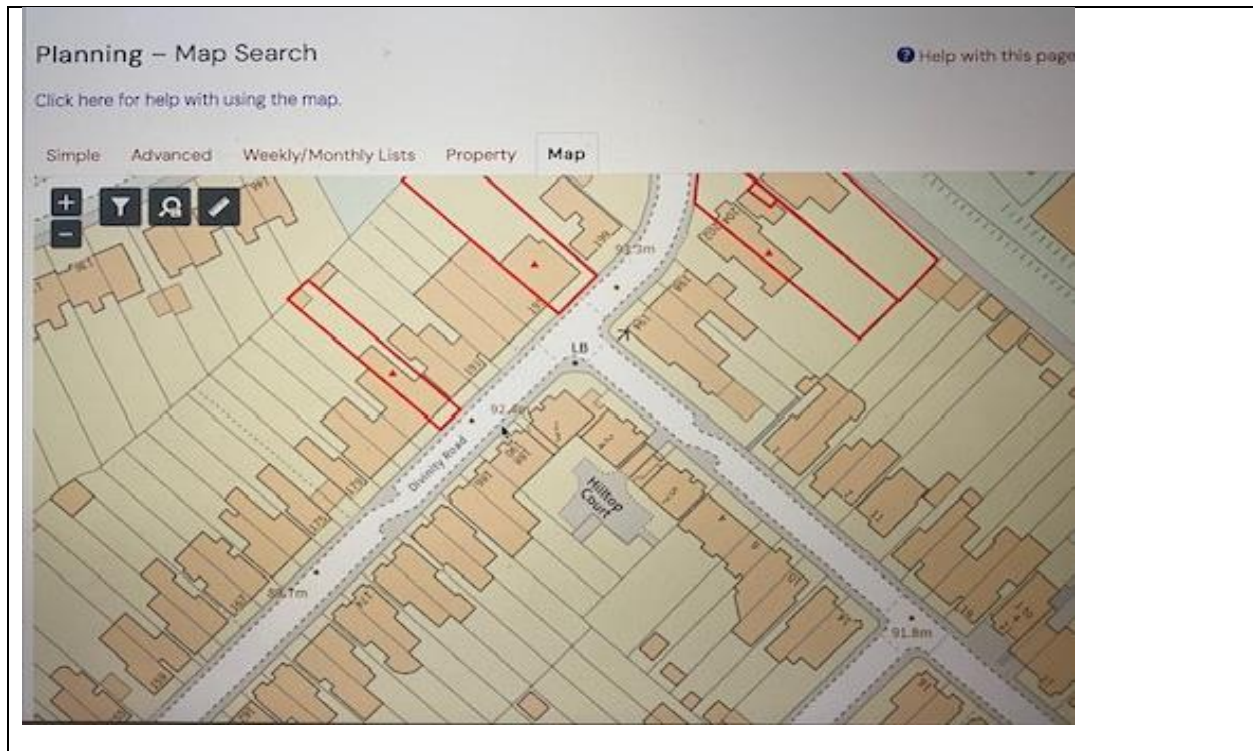
Entrance to 144 Morell Avenue FROM
Divinity Road.



2) Flats 1-7 Hill Top Court Flats Road

Oxford planning has advised under a FOI request that flats 1-7 have been combined into one building following the guidelines under H6. The following image from the Oxford Planning clearly shows that Flat 1 & 3 occupy one building, 2&4 occupy a second discrete block and 5&7 occupy a separate block. The entrances are from separate roads (Divinity Road and Hill Top Road) you cannot walk through the building from Flat 1 too Flat 7 – they are separate blocks accessed from separate roads. Each block of two has been designed to replicate a Victorian detached house. Therefore, instead of 1 building it should count as 3. This increases the number used by the council by 2 buildings.

Planning Map Search – Flats 1-7 Hilltop Court, Hill Top Road.



Google Image Flat 2 & 4 plus 5 & 7 Hilltop Court Flats.

The design of Flat 1-7 Hilltop Court Flats is to replicate the Victorian style housing. There are three discrete buildings each housing 2 flats. This is an image of Flats 2&4 plus 5&7. There is a covered walkway between the buildings – but you cannot walk from Flat 1 to Flat 7 without going outside. This is not a single block of flats in that respect.



In conclusion there are 63 separate houses/dwellings within 100 meters either side, and including 187 Divinity.

B) Numerator (number of HMO's and suspected houses used for multiple occupancy).

Calculating the numerator is made more complicated because of the inclusion of suspected HMO houses - which the planning service does not publish. Under the FOI request FOI2024/00150 information the response by the Council was that **this information is not retained or stored.**

Further the HMO list is not without its own issues – there are two categories. Category A is an HMO property that HAS C4 – HMO planning use whilst Category B is an HMO that DOES NOT have C4 HMO planning use.

The following extract is form the publically available HMO register on the DATE OF SUBMISSION (02/02/2024)

HMO's within 100 meters of 187 Divinity @ 02/02/2024.

HMO Register dated 02 February 2024			
Location		64 HMOs	
<input type="text" value="Divinity road"/>			
Case Number	Location	Total Number Occupants	Total Number Units
22/04565/HMOMAN	150 Divinity Road, OX4 1LR	5	
22/00169/HMOMAN	155 Divinity Road, OX4 1LP	6	
21/03850/HMOMAN	16 Divinity Road, OX4 1LJ	6	
21/03107/HMOMAN	161 Divinity Road, OX4 1LP	5	
23/01410/HMOMAN	162 Divinity Road, OX4 1LR	7	
23/01373/HMOMAN	164 Divinity Road, OX4 1LR	5	
23/00173/HMOMAN	17 Divinity Road, OX4 1LH	7	
19/02818/HMOLIC	173 Divinity Road, OX4 1LP	6	
23/02794/HMOMAN	174 Divinity Road, OX4 1LR	5	
22/03968/HMOMAN	181 Divinity Road, OX4 1LP	5	
23/00917/HMOMAN	187 Divinity Road, OX4 1LP	5	
23/00128/HMOMAN	195 Divinity Road, OX4 1LP	5	
23/00125/HMOMAN	196 Divinity Road, OX4 1LS	5	
23/02453/HMOADD	198 Divinity Road, OX4 1LS	4	
23/03302/HMOMAN	2 Divinity Road, OX4 1LJ	6	
23/00555/HMOMAN	21 Divinity Road, OX4 1LH	6	
23/02428/HMOMAN	22 Divinity Road, OX4 1LJ	8	

Table combining number of properties and HMO listed as at 02/02/2024

Count	Address	HMO	year started	Expired Date	Issued date
1	1 Hill Top Road				
2	3 Hill Top Road				
3	4 Hill Top Road				
4	5 Hill Top Road				
5	6 Hill Top Road				
6	7 Hill Top Road				
7	8 Hill Top Road				
8	10 Hill Top Road				
9	11 Hill Top Road				
10	153 Divinity Road				
11	154 Divinity Road				
12	155 Divinity Road	HMO	1977	31/03/2023	
13	157 Divinity Road				
14	158 Divinity Road				
15	159 Divinity Road				
16	160 Divinity Road				
17	161 Divinity Road	HMO		10/11/2026	11/11/2021
18	162 Divinity Road	HMO		17/07/2025	18/07/2023
19	163 Divinity Road				
20	164 Divinity Road	HMO		13/11/2024	08/07/2023
21	165 Divinity Road				
22	166 Divinity Road				
23	167 Divinity Road				
24	168 Divinity Road				
25	169 Divinity Road				
26	170 Divinity Road				
27	171 Divinity Road				
28	172 Divinity Road				
29	173 Divinity Road	HMO		21/10/2024	22/10/2019
30	174 Divinity Road	HMO		30/10/2025	31/10/2023
31	175 Divinity Road				
32	176 Divinity Road				
33	177 Divinity Road				
34	178 Divinity Road				
35	179 Divinity Road				
36	180 Divinity Road				
37	181 Divinity Road	HMO		16/01/2025	17/01/2023
38	182 Divinity Road				
39	183 Divinity Road				
40	184 Divinity Road				
41	185 Divinity Road				
42	186 Divinity Road				
43	187 Divinity Road	HMO		01/05/2024	
44	188 Divinity Road (2 Flats)				
45	189 Divinity Road				
46	191 Divinity Road				
47	1-7 Hilltop Court Flats				
48	193A Divinity Road				
49	193B Divinity Road				
50	194 Divinity Road (2Flats)				
51	195 Divinity Road	HMO		06/03/2024	
52	196 Divinity Road	HMO		03/03/2024	
53	197 Divinity Road				
54	198 Divinity Road	HMO		03/09/2028	03/09/2023
55	199 Divinity Road				

56	202 Divinity Road			
57	203 Divinity Road			
58	204 Divinity Road			
59	205 Divinity Road			
60	206 Divinity Road			
Planning		60	11	11
				7
	144 Morell Avenue			
	Flat 2-4 Hilltop Court			
	Flat 5-7 Hilltop Court			
Applicant		63	11	11
	02/02/2024		11	
	10/02/2024		11	
	31/03/2024		8	
	Planning		18.33%	
	Applicant		17.46%	

Planning have identified 60 properties within 100 meters of 187 Divinity Road. There are 11 HMO's (02/02/24) including 187 Divinity Road. Therefore, the HMO Density is 18.33% including 187 Divinity Road. Therefore, BELOW 20%. When taking into consideration 144 Morell Avenue AND splitting the Hilltop Court Flats 1-7 into the three blocks the total number of properties rises to 63. Therefore, HMO density FALLS to 17.46%. Below 20%.

Of the 11 HMO's ONLY 1 has C4 use. The others are C3. Only 1/60 1.7% comply with the regulations.

We fully commit to the drive to improve the quality of letting property in Oxford and to the quality of HMO property. We are proud of our commitment to offer and deliver excellent accommodation. We have been a licenced HMO since 2015. We welcome and meet all inspection criteria. We would now like to join the 1 HMO's within the proximity of 187 Divinity to become the 2nd that has planning change of use from C3 to C4. We believe that Oxford Council is making a drive to ensure un-licenced HMO's are brought into the full care and protection of the council – which is why they adopted the policy to make sure change of use was included in the list of attainments. This policy should be applied equally to all properties that the council suspects are being used as un-licenced HMO's without the appropriate Class 4 usage.

H16 Outdoor Amenity Space Policy of the Oxford Local Plan 2036

Car Parking Policy M3 of the Oxford Local Plan 2036

187 Divinity is located within a 160m walk to frequent public transport services and within 800m walk to a local supermarket at the bottom of Divinity Road. There is ample storage of cycles 187 Divinity has two on-street permit parking space, from our experience, car parking space would not be required for most of me due to the tenant's employment circumstance.

In conclusion

Prior to our family living in 187 Divinity the property was let for board and lodgings. We lived as a family in the home from 2013 to 2015. Since 2015 we have made alterations to the property to enable us to meet the HMO standards. We have been certificated since 2015. Inspectors have said it one of the best HMO le ng homes (rather than le ng house) in Oxford. In terms of HMO space requirements all rooms exceed the guidelines by double if not triple. The tenants can enjoy uninterrupted use of an extensive garden. We provide secure shelter for bicycles and continue to be strongly in favour of sustainability and manage the recycling and general use bins well. We have a policy to let to only postgraduate and professional tenants. We have never received a complaint from our closest neighbours. It is an exceptionally well managed HMO. **In terms of HMO density within 100 meters either side and including all of the HMO's we are below 20%** - including 187 Divinity. We are delighted with the new traffic management system on Divinity Road – it is life changing. We will not be seeking any additional parking permits. We strongly encourage micro- journeys to be by foot, cycle or local transport (which is within 160 meters of the property).

END