

PLANNING STATEMENT FOR THE CHANGE
OF USE FROM A DWELLINGHOUSE (USE
CLASS C3) TO A FOUR-BEDROOM, SIX-
PERSON HMO (USE CLASS C4)



4 Seaton Road, Hayes, Greater London, UB3 1NS

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1. Introduction

- 1.1. This Planning Statement supports an application for the change of use of 4 Seaton Road, Hayes, Greater London, UB3 1NS from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation accommodating up to six residents (Use Class C4).
- 1.2. Planning permission is required under the London Borough of Hillingdon's borough-wide Article 4 Direction, which removes permitted development rights for changes from Use Class C3 to Use Class C4.
- 1.3. The proposal would retain the property in residential use and make efficient use of the existing housing stock. The maximum occupancy would be clearly restricted to six residents, supported by suitable communal facilities and appropriate management arrangements. The property would retain its domestic character and provide suitable living conditions, amenity space, parking, cycle storage and refuse facilities for its residents.
- 1.4. The proposal accords with the relevant national, regional and local policies governing HMO development. It would contribute to housing choice by providing a flexible form of shared housing while retaining the site in residential use.

2. Site and Surrounding Context

- 2.1. The application site comprises a two-storey semi-detached dwelling situated on Seaton Road within an established residential area of Hayes. The surrounding streetscene is characterised predominantly by two-storey semi-detached dwellings of broadly similar scale and appearance.
- 2.2. The property benefits from a front garden and parking area, together with a private rear garden. It has previously been extended by a part two-storey and part single-storey rear extension approved under application reference 6181/APP/2004/1701. A Certificate of Lawfulness was subsequently granted under reference 6181/APP/2024/779 for a hip-to-gable roof enlargement, rear dormer extension and three front rooflights.
- 2.3. The property is not listed and does not lie within a conservation area, World Heritage Site or Article 2(3) land. The site is located within Flood Zone 1 and is therefore at a low probability of flooding from rivers and the sea.
- 2.4. The site has a Public Transport Accessibility Level (PTAL) rating of 2. Although this represents a relatively modest rating in London-wide terms, it does not fully reflect the site's practical accessibility. The nearest bus stops are approximately two to three minutes' walk from the property, while Hayes & Harlington Station can be reached within approximately 12 to 15 minutes on foot or five minutes by bus.
- 2.5. Hayes & Harlington Station provides Elizabeth line and National Rail services, offering frequent and direct connections to Central London, Heathrow Airport, Reading and Maidenhead. Together with nearby bus services and local facilities, these connections provide residents with realistic alternatives to private-car travel. Given the proposed occupancy of only up to six people, it is therefore reasonable to expect that not every resident would need to own or regularly use a car.

3. The Proposed Development

- 3.1. The application seeks planning permission to change the use of the property from a single dwellinghouse (Use Class C3) to a small House in Multiple Occupation accommodating a maximum of six residents (Use Class C4).
- 3.2. The proposed HMO would contain two double-occupancy bedrooms and two single-occupancy bedrooms. Bedroom 1 would be located on the ground floor, with the remaining three bedrooms at first-floor level. Their respective floor areas and occupancy levels would be:
 - Bedroom 1: 11.5 sqm;
 - Bedroom 2: 14.6 sqm;
 - Bedroom 3: 8.7 sqm; and
 - Bedroom 4: 10.2 sqm.
- 3.3. Residents would share a 13.9 sqm kitchen and a separate 10.3 sqm living and dining room at ground-floor level. Two shared shower rooms would be provided, one on each floor. The arrangement would provide appropriately sized sleeping accommodation alongside dedicated communal cooking, dining and living facilities.
- 3.4. No extensions or external alterations are proposed. The existing appearance, footprint and domestic character of the dwelling would remain unchanged. The rear garden would also be retained as communal private amenity space for residents. The detached outbuilding would remain ancillary to the property and would not be used as living or sleeping space.
- 3.5. Two off-street parking spaces would be retained at the front of the property. Three refuse and recycling bins would be stored within the frontage, adjacent to the dwelling, allowing convenient presentation for collection. The existing rear garage, measuring approximately 19.8 sqm, would provide secure and covered cycle storage.
- 3.6. The HMO would be operated in accordance with the submitted Management Plan. This provides for a named responsible manager, controlled occupancy, written tenancy agreements, regular inspections, cleaning and maintenance arrangements, refuse management, safety compliance, house rules and

procedures for investigating complaints. These measures would ensure that the property is responsibly managed and that the amenities of residents and neighbouring occupiers are protected.

4. Planning Policy

Introduction

- 4.1. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires planning applications to be determined in accordance with the development plan unless material considerations indicate otherwise. For this application, the development plan comprises the London Plan (2021) and the Hillingdon Local Plan Parts 1 and 2.
- 4.2. The National Planning Policy Framework (NPPF), relevant supplementary guidance and statutory HMO standards are also material considerations.

National Planning Policy Framework

- 4.3. The NPPF (December 2024) establishes a presumption in favour of sustainable development and supports the efficient use of existing land and buildings to meet identified housing needs.
- 4.4. Paragraph 109 promotes sustainable transport and requires transport considerations to be addressed from the earliest stages of development. Paragraphs 115 and 116 require development to provide safe and suitable access and state that permission should only be refused on highway grounds where there would be an unacceptable effect on highway safety or the residual cumulative effects on the road network would be severe.
- 4.5. Paragraph 124 supports the efficient use of land, taking account of housing need, accessibility, local character and the availability of infrastructure and services.
- 4.6. Paragraph 135 requires development to function well, respond to local character and create places that promote health and wellbeing, with a high standard of amenity for existing and future users.

The London Plan

- 4.7. The London Plan (2021) provides the strategic planning framework for Greater London. The following policies are relevant:
 - Policy H9 – Ensuring the Best Use of Stock: seeks to prevent the unnecessary loss of housing and encourages the effective use of existing housing stock.

- Policy H10 – Housing Size Mix: requires housing proposals to have regard to local housing needs and the delivery of a suitable range of housing types and sizes.
- Policy D3 – Optimising Site Capacity through the Design-led Approach: requires development to respond appropriately to its context and provide a high standard of residential quality.
- Policy D6 – Housing Quality and Standards: seeks high-quality housing that provides adequate space, privacy, daylight, outlook and functional layouts.
- Policy T4 – Assessing and Mitigating Transport Impacts: requires transport effects to be appropriately considered and mitigated.
- Policy T5 – Cycling: requires appropriate, secure and accessible cycle-parking provision.
- Policy T6 – Car Parking: applies maximum parking standards and encourages sustainable travel while recognising local accessibility and operational requirements.
- Policy SI7 – Reducing Waste and Supporting the Circular Economy: requires suitable facilities for the separate storage and collection of refuse and recycling.

Hillingdon Local Plan

4.8. The Hillingdon Local Plan comprises Part 1: Strategic Policies, adopted in November 2012, and Part 2: Development Management Policies, adopted in January 2020.

4.9. Policy BE1 of the Local Plan Part 1 seeks high-quality development that respects local character and protects the amenity of residents.

4.10. The principal Local Plan Part 2 policies are:

- Policy DMH 1 – Safeguarding Existing Housing: seeks to prevent the net loss of residential accommodation. For the purpose of the policy, residential accommodation includes uses falling within Classes C3 and C4.
- Policy DMH 2 – Housing Mix: seeks a mix of housing sizes that reflects the Council's latest evidence of housing need, including the identified need for family-sized housing.

- Policy DMH 5 – Houses in Multiple Occupation and Student Accommodation: requires HMO development to demonstrate accessibility to local amenities and public transport, satisfactory living conditions and no adverse effect on neighbouring amenity or local character.
- Policy DMH 5(B): applies to applications within areas covered by an HMO Article 4 Direction. It controls the concentration of HMOs and requires compliance with standards relating to parking, waste storage, amenity space, garage retention and neighbouring amenity.
- Policy DMHB 11 – Design of New Development: requires development to respond appropriately to the character of the site and its surroundings and to safeguard residential amenity.
- Policy DMHB 15 – Planning for Safer Places: seeks development that minimises opportunities for crime and antisocial behaviour.
- Policy DMHB 16 – Housing Standards: seeks satisfactory living conditions, including appropriate internal space, privacy, daylight, ventilation and outlook.
- Policy DMHB 18 – Private Outdoor Amenity Space: requires adequate, usable and conveniently located private outdoor space appropriate to the number of occupiers.
- Policies DMT 1 and DMT 2 – Transport and Highway Safety: require development to avoid unacceptable transport, highway-safety and pedestrian impacts.
- Policy DMT 5 – Pedestrians and Cyclists: promotes safe and convenient pedestrian and cycle access and suitable cycle storage.
- Policy DMT 6 – Vehicle Parking: requires development to comply with the Council's parking standards unless a departure can be demonstrated not to harm the surrounding highway network.

Supplementary Guidance and HMO Standards

4.11. The Council's Houses in Multiple Occupation and Other Non-self-contained Housing Supplementary Planning Guidance (August 2004) provides further guidance on the conversion and operation of HMOs. Although it predates the current Local Plan, its detailed standards may remain a material consideration where consistent with the adopted development plan.

4.12. The guidance seeks, among other matters:

- at least one ground-floor habitable room exceeding 10 sqm, excluding the kitchen, for communal living;
- adequate kitchen and shared facilities;
- approximately 15 sqm of usable external amenity space for each habitable room, excluding communal living rooms;
- up to one off-street parking space for every two occupiers or lettable rooms; and
- suitable secure cycle storage and refuse facilities.

4.13. The Council's Minimum Standards for Houses in Multiple Occupation provide separate Housing Act guidance covering property condition, basic amenities, fire and electrical safety, refuse provision and the suitability of the property for its intended number of residents.

4.14. Accessible Hillingdon should also be considered where physical works or alterations affecting accessibility are proposed. In this case, the application principally concerns a change of use, with no external alterations proposed.

National HMO Space Standards

4.15. The Licensing of Houses in Multiple Occupation (Mandatory Conditions of Licences) (England) Regulations 2018 establish the following national minimum sleeping-room sizes for licensed HMOs:

- 6.51 sqm for one person aged ten or over;
- 10.22 sqm for two people aged ten or over; and
- 4.64 sqm for one child under ten.

4.16. A room measuring less than 4.64 sqm cannot be used as sleeping accommodation. Local housing authorities may impose larger minimum sizes through their licensing standards where justified.

4.17. Bedrooms 1 and 2, measuring 11.5 sqm and 14.6 sqm respectively, exceed the national minimum of 10.22 sqm for occupation by two adults. Bedrooms 3 and 4, measuring 8.7 sqm and 10.2 sqm respectively, exceed the minimum of 6.51 sqm for single occupation.

4.18. Planning permission and HMO licensing are separate regulatory requirements. Compliance with minimum bedroom sizes does not, by itself, establish an

acceptable planning layout; the Council will also assess the quality of communal facilities, privacy, outlook, amenity space, parking, waste storage and the effects of the use on neighbouring occupiers.

4.19. The proposal is assessed against this policy framework in Section 5 of this Statement.

5. Planning Considerations

Principle of Development

- 5.1. The application seeks to change the use of the property from a dwellinghouse (Use Class C3) to a small HMO accommodating a maximum of six residents (Use Class C4). The proposed accommodation would comprise two double-occupancy bedrooms and two single-occupancy bedrooms.
- 5.2. Although the form of residential occupation would change, the property would remain wholly in residential use and there would be no loss of residential floorspace. No extensions, subdivision into self-contained units or irreversible external alterations are proposed, and the building would remain physically capable of returning to family occupation in the future.
- 5.3. This must also be balanced against the contribution that a well-designed six-person HMO would make towards meeting the needs of single-person households and providing a flexible and comparatively affordable form of housing. The development would therefore maintain the site's residential function while contributing to a broader mix of housing options, consistent with the objectives of Local Plan Policies DMH 2 and DMH 5 and London Plan Policies H9 and H10.
- 5.4. The proposal would accommodate no more than six residents and would remain within Use Class C4. This occupancy should be secured by condition to prevent any subsequent intensification without further planning consideration.

HMO Concentration

- 5.5. Hillingdon's borough-wide Article 4 Direction does not prohibit new HMOs. It enables the Council to assess their concentration, quality and local effects against the development plan.
- 5.6. The proposal is for a small C4 HMO rather than a large sui generis establishment. The maximum occupancy would be clearly defined and controlled, avoiding the potential for incremental or uncontrolled intensification.
- 5.7. The Council's records of licensed HMOs, HMO planning permissions, student council-tax exemptions and other known HMO uses should be applied when calculating the concentration within the areas prescribed by Policy DMH 5. Subject to confirmation that the relevant thresholds are not exceeded, the proposal would

maintain an appropriate balance of household types and comply with Policy DMH 5(B).

Living Conditions for Future Residents

5.8. The proposed HMO would contain four bedrooms accommodating a maximum of six residents:

- Bedroom 1 – 11.5 sqm: double occupancy;
- Bedroom 2 – 14.6 sqm: double occupancy;
- Bedroom 3 – 8.7 sqm: single occupancy; and
- Bedroom 4 – 10.2 sqm: single occupancy.

5.9. Bedrooms 1 and 2 exceed the national minimum of 10.22 sqm for occupation by two adults, while Bedrooms 3 and 4 exceed the minimum of 6.51 sqm for one adult. Bedroom 4 would remain restricted to single occupancy because it falls slightly below the 10.22 sqm double-occupancy standard. The approved occupancy arrangement should be secured by condition.

5.10. Residents would share a 13.9 sqm kitchen and a separate 10.3 sqm living and dining room. The proposal therefore exceeds the indicative standards in Hillingdon's HMO guidance for a kitchen of at least 6.5 sqm and a separate ground-floor communal living room exceeding 10 sqm. Two shared shower rooms would also be provided, one on each floor.

5.11. A separate communal living and dining room is not expressly required by the national HMO licensing room-size standards. However, planning permission is subject to a broader assessment of whether the overall layout would provide satisfactory and functional living conditions. Hillingdon Council has recently treated the absence of meaningful internal communal space as a significant planning concern under Policies DMH 5, DMHB 16 and London Plan Policy D6.

5.12. Under application 79879/APP/2026/176 at 21 North Avenue, the Council refused a six-person HMO partly because its only communal facility was a kitchen, with no shared living or dining space. The Council concluded that the arrangement would result in poor functionality and tend to confine residents to their bedrooms. It also found that greater reliance on the rear garden as the principal communal space would harm the privacy of a ground-floor bedroom adjoining it.

5.13. Similar concerns arose under application 157/APP/2026/147 at 5 Gerrard Gardens.

The Council found that the absence of a separate living or dining room, together with limited kitchen provision, would place excessive reliance on the shared garden for social activity. This would create an unacceptable relationship with the ground-floor bedrooms through overlooking, noise, disturbance and loss of privacy.

5.14. The present scheme directly addresses the shortcomings identified in those decisions. Unlike the refused layouts, it provides both a generously sized kitchen and a separate internal living and dining room. Residents would therefore have meaningful communal space in which to cook, eat, relax and socialise without being confined to their bedrooms or dependent upon the rear garden as their principal social space.

5.15. The layout would consequently reduce pressure for intensive use of the garden and avoid the privacy conflict identified in the North Avenue and Gerrard Gardens decisions. Together with the suitably sized bedrooms, two shower rooms and retained rear garden, the proposal would provide satisfactory living conditions in accordance with Policies DMH 5, DMHB 16 and DMHB 18 and London Plan Policy D6.

Character and Appearance

5.16. No extensions or external alterations are proposed. The dwelling would retain its existing scale, form, elevations, footprint and domestic appearance and would continue to be read as a semi-detached house within the Seaton Road streetscene.

5.17. The proposal would not introduce institutional features, additional entrances, external staircases or other alterations that would distinguish the property from neighbouring dwellings. The existing front parking area and rear garden would also be retained.

5.18. Accordingly, the proposed change of use would have no adverse visual effect upon the host dwelling or surrounding streetscene and would preserve the established residential character of the area. It would comply with London Plan Policies D3 and D4, Local Plan Part 1 Policy BE1 and Local Plan Part 2 Policy DMHB 11.

Neighbouring Residential Amenity

5.19. The proposed occupancy would remain within the six-person limit of Use Class C4.

While residents may follow independent routines, the effect of the use must be assessed having regard to the property's size, internal layout, communal facilities and management arrangements rather than occupancy numbers alone.

5.20. No external works are proposed that could cause overlooking, overshadowing, loss of outlook or visual intrusion. The physical relationship between the dwelling and neighbouring properties would remain unchanged.

5.21. The separate living and dining room is particularly relevant to neighbouring amenity.

It would provide a meaningful internal area for social activity and reduce reliance upon the rear garden, thereby limiting the potential for concentrated outdoor activity, noise and disturbance. This distinguishes the scheme from the layouts refused at 21 North Avenue and 5 Gerrard Gardens.

5.22. The submitted Management Plan provides additional safeguards through written tenancy agreements, house rules, quiet hours, regular inspections and procedures for responding to complaints relating to noise, waste or occupier behaviour. A named responsible manager and emergency contact would be available to residents and immediate neighbours.

5.23. The unchanged physical relationship with neighbouring dwellings, provision of adequate internal communal space and active management arrangements would protect the living conditions of adjoining occupiers. The proposal would therefore comply with NPPF paragraph 135(f), London Plan Policies D3 and D13 and Local Plan Policies DMH 5 and DMHB 11.

Access, Parking and Sustainable Travel

5.24. Two independently accessible off-street parking spaces would be retained within the front of the property. These spaces would accommodate a substantial proportion of the potential parking demand within the site and would avoid the displacement of resident vehicles onto Seaton Road.

5.25. Hillingdon has applied an indicative standard of one parking space per two HMO residents in recent decisions, equating to three spaces for six occupiers. However, Policy DMT 6 permits a lower level of provision where it can be demonstrated that it

would not adversely affect the surrounding highway network. The standard should therefore be applied having regard to the site's actual accessibility, availability of alternative travel modes and local parking conditions.

- 5.26. Although the site has a PTAL rating of 2, this strategic London-wide measure does not fully reflect the particularly convenient public-transport choices available to residents. The nearest bus stops are only approximately two to three minutes' walk from the property and provide convenient access to surrounding services and transport connections.
- 5.27. Hayes & Harlington Station is approximately 12 to 15 minutes away on foot or around five minutes by bus. The station is served by the Elizabeth line and National Rail, providing frequent and direct services to Central London, Heathrow Airport, Reading and Maidenhead. The Elizabeth line provides access to major employment, education, retail and leisure destinations without requiring a private car.
- 5.28. These connections make the property suitable for residents who commute by public transport, including those working at Heathrow, Hayes, Ealing, Paddington and elsewhere along the Elizabeth line. It is therefore reasonable to expect that not every resident would own or regularly use a car.
- 5.29. In addition to the two on-site spaces, unrestricted on-street parking is available along Seaton Road. Given the site's convenient bus and rail connections, the six-person occupancy would not automatically translate into demand for six vehicles. Any occasional demand exceeding the on-site provision could therefore be accommodated without necessarily causing obstruction or unlawful parking.
- 5.30. The circumstances are materially different from those considered under application 79879/APP/2026/176 at 21 North Avenue. In that case, the nearest bus stop was approximately 400–500 m away, the street was described as having a narrow carriageway functioning effectively as a single traffic lane, and the applicant had not demonstrated that the proposed parking spaces were physically workable. By contrast, the present site is within two to three minutes' walk of a bus stop, within convenient walking distance of a major Elizabeth line station and retains two clearly identified off-street spaces, with additional on-street parking available nearby.

- 5.31. The existing 19.8 sqm rear garage would provide secure and covered storage for bicycles, ensuring that cycling represents a convenient everyday travel option.
- 5.32. The combination of two retained off-street spaces, nearby on-street capacity, immediate access to bus services, proximity to Hayes & Harlington Station and secure cycle storage would provide residents with a balanced range of travel options. The modest departure from the indicative parking standard would not, in itself, result in severe highway effects or an unacceptable highway-safety impact. The proposal would therefore comply with NPPF paragraphs 115 and 116, London Plan Policies T2, T4, T5 and T6 and Local Plan Policies DMT 1, DMT 2, DMT 5 and DMT 6.

Refuse and Recycling

- 5.33. The proposed plans identify storage for three refuse and recycling bins within the frontage adjacent to the dwelling. The location would be readily accessible to residents and would allow the bins to be conveniently presented for collection without being stored permanently on the highway.
- 5.34. Residents would receive written instructions covering waste separation, storage and collection days. The property manager would monitor the arrangements and address any overflow, contamination or bins left outside the designated storage area for an unreasonable period.
- 5.35. The designated bin storage and active management arrangements would prevent unacceptable litter, odour or visual harm and would ensure compliance with London Plan Policy SI7 and Local Plan Policy DMH 5(B).

Management and Community Safety

- 5.36. The property would be managed by the owner or a professional managing agent, with a named responsible person overseeing its day-to-day operation, resident communication, inspections, maintenance, safety compliance and neighbour liaison. Residents would enter into written tenancy or licence agreements and receive house rules covering noise, visitors, smoking, refuse disposal and the use of communal areas. Regular inspections, cleaning arrangements, maintenance records and a formal complaints procedure would provide an auditable framework for responsible operation. These measures would minimise opportunities for

nuisance and antisocial behaviour in accordance with Local Plan Policies DMH 5 and DMHB 15.

6. Planning Balance and Conclusion

- 6.1. The application seeks planning permission to change the use of 4 Seaton Road from a dwellinghouse (Use Class C3) to a four-bedroom HMO accommodating up to six residents (Use Class C4). The property would remain wholly residential, with no extensions or external alterations, and would retain the appearance and character of a conventional semi-detached dwelling.
- 6.2. While the proposal would change the property's form of occupation, there would be no loss of residential floorspace. The absence of irreversible alterations means that the building would remain capable of returning to family occupation, while presently meeting the need for flexible shared housing. The proposal therefore accords with the objectives of NPPF paragraphs 124 and 135, London Plan Policies H9 and H10 and Local Plan Policies DMH 1, DMH 2 and DMH 5.
- 6.3. The two double-occupancy and two single-occupancy bedrooms would meet the applicable national minimum room sizes. Residents would also benefit from a 13.9 sqm kitchen, a separate 10.3 sqm living and dining room, two shower rooms and a retained rear garden. The separate communal room directly addresses the poor-functionality and privacy concerns identified by Hillingdon Council in recent HMO decisions. The scheme would therefore provide satisfactory living conditions in accordance with NPPF paragraph 135(f), London Plan Policies D3 and D6 and Local Plan Policies DMH 5, DMHB 16 and DMHB 18.
- 6.4. Two off-street parking spaces would be retained, with unrestricted on-street parking available nearby. The site is within two to three minutes' walk of bus services and approximately 12 to 15 minutes' walk, or five minutes by bus, from Hayes & Harlington Station. Elizabeth line and National Rail services provide frequent connections to Central London, Heathrow Airport, Reading and Maidenhead, offering realistic alternatives to private-car travel. Secure and covered cycle storage would also be available within the rear garage. These arrangements accord with the sustainable-transport objectives of NPPF paragraphs 115 and 116, London Plan Policies T2, T4, T5 and T6 and Local Plan Policies DMT 1, DMT 2, DMT 5 and DMT 6.
- 6.5. Designated refuse storage and the submitted Management Plan would support the responsible operation of the property by addressing waste, maintenance, resident conduct and neighbour liaison. These measures would protect the streetscene and neighbouring amenity in accordance with London Plan Policies SI7 and D13 and Local Plan Policies DMH 5, DMHB 11 and DMHB 15.
- 6.6. With regard to the concentration criteria, the proposal should be assessed using the Council's most up-to-date records of licensed, permitted and otherwise known HMOs, together with relevant student council-tax exemptions. Provided that the applicable thresholds are not exceeded, the development would preserve the existing balance of housing within the locality and accord with Policy DMH 5(B).

- 6.7. Overall, the proposal would provide a suitably designed and responsibly managed form of shared housing without unacceptable effects on local character, residential amenity, living conditions, parking, highway safety or waste management. The development would comply with national policy, the London Plan and the Hillingdon Local Plan when read as a whole. Planning permission should therefore be granted.